CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Sustainable Communities Environmental Assessment

Sportsmen's Lodge Mixed-Use Project (Recirculated)

Case Number: ENV-2021-7013-SCEA

Project Location: 12825 Ventura Boulevard, Los Angeles, California 91604

Community Plan Area: Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass

Council District: CD 4—Nithya Raman

Project Description: The Sportsmen's Lodge Mixed-Use Project includes the development of three above-grade low- to mid-rise structures with a common subterranean parking structure on an approximately 5.8-acre site. The Project would replace the existing Sportsmen's Lodge Hotel and parking areas with 520 residential units, including 78 Very Low-Income affordable units; 18,019 square feet of restaurant uses; 27,926 square feet of retail uses; and 64,151 square feet of residential amenity and accessory space. The Project would incorporate approximately 66,816 square feet a variety of open space and recreational amenities, including approximately 52,520 square feet of exterior common open space and approximately 14,296 square feet of interior common open space. Additionally, the Project would include approximately 12,550 square feet of private open space. Approximately 21,039 square feet of open spaces would be accessible to the public. The Project would provide 1,385 total vehicular parking spaces and 264 bicycle parking spaces (224 long-term and 40 short-term), as well as 49 spaces relocated long-term spaces, for a total of 313 bicycle parking spaces. Upon completion, the Project would result in up to 650,996 square feet of floor area within the Project Site with a maximum floor area ratio (FAR) of 2.84:1.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
Sportsmen's Lodge Owner, LLC

October 2022

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1 INTRODUCTION

An application for the proposed Sportsmen's Lodge Mixed-Use Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of a Sustainable Communities Environmental Assessment (SCEA) is required. A SCEA was published on July 28, 2022, and was available for public review from July 28, 2022, to August 29, 2022. Subsequent to the publication of the SCEA, a Supplemental Noise Analysis was prepared to further evaluate potential noise impacts during construction of the Project. This analysis is included as Appendix J.2 of this document. Section 5, Item XIII, Noise, of this recirculated SCEA, incorporates the additional information from the Supplemental Noise Analysis, with edits to the noise mitigation measures also incorporated into Section 6.5, Mitigation Monitoring Program, of this document. Additional corrections and additions have also been incorporated throughout this recirculated SCEA. All edits are shown in redline/strikeout. None of the clarifying information or edits impact any of the significance conclusions made in the original SCEA. Public review requirements described in Section 1.1.2, below are applicable to this recirculated SCEA.

This SCEA evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this SCEA, the City has concluded that the Project qualifies as a Transit Priority Project (TPP), is consistent with an adopted Sustainable Communities Strategy (SCS) that has been accepted by the California Air Resources Board (CARB) as meeting the State's greenhouse gas (GHG) reduction targets, and that the Project would not result in significant impacts on the environment. This SCEA is intended as an informational document, which is ultimately required to be considered and adopted by the decision-making body of the City in conjunction with approval of the Project.

1.1 PURPOSE

The California Environmental Quality Act (CEQA) was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

Public Resources Code Section 21155.2(b)(1) requires that an Initial Study be prepared for each SCEA. An Initial Study is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If a qualifying project meets certain criteria described below and the Initial Study shows that any potential significant effects would be

avoided or mitigated to a point where clearly no significant effects would occur through project mitigation measures, a SCEA may be prepared. If it is determined in the Initial Study that there is substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, an Environmental Impact Report (EIR) is normally required.[1]

1.1.1 Senate Bill 375

The State of California adopted Senate Bill (SB) 375, also known as the "Sustainable Communities and Climate Protection Act of 2008", which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California's GHG emissions reduction mandates. SB 375 requires the State's 18 metropolitan planning organizations to incorporate an SCS into the regional transportation plans to achieve their respective region's GHG emission reduction targets set by the CARB. Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria. The SCEA is one of these streamlining tools.

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). On September 3, 2020, SCAG's Regional Council adopted Resolution 20-624-1, which approved the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS, also known as Connect SoCal) in its entirety. For the SCAG region, CARB has set GHG emissions reduction targets at 19 percent below 2005 per capita emissions levels by 2035. SCAG's resolution adopting the 2020–2045 RTP/SCS also determined that the SCS includes strategies to meet the requirements of SB 375 to achieve these GHG emission reduction goals and directed SCAG staff to submit the 2020–2045 RTP/SCS to CARB for review and certification in this regard. On October 30, 2020, pursuant to Executive Order No. G-20-239, CARB "accept[ed] the SCAG determination that its 2020 SCS would, when implemented, meet the emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels."

SB 375 allows the City, acting as Lead Agency, to prepare a SCEA as the environmental CEQA clearance for Transit Priority Projects (TPPs), as described below, that are consistent with the 2020–2045 RTP/SCS.

1.1.2 Purpose and Content of a SCEA

The purpose of a SCEA is to evaluate the environmental effects of a project in accordance with CEQA and PRC Sections 21155 and 21155.2. In addition, a SCEA must evaluate a project's consistency with SCAG's RTP/SCS and incorporates feasible mitigation measures, performance standards, and/or criteria from prior applicable EIRs into the proposed project.

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[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the lead agency when there is substantial evidence that the project may cause a significant effect on the environment: (A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

The SCEA form of CEQA documentation was established by SB 375 to provide streamlined environmental review for certain TPPs. TPPs are residential or mixed-use residential projects that provide a minimum net density of 20 dwelling units per acre and are located within one-half mile of a major transit stop or high-quality transit corridor (Public Resources Code Section 21155(b)). The intent of the CEQA streamlining provisions is to reduce documentation and redundancy and to provide an incentive for TPPs that are consistent with a larger effort to reduce GHG emissions by integrating transportation and land use planning.

A SCEA is comparable to a Mitigated Negative Declaration (MND) in that the lead agency must find that all potentially significant impacts of a project have been identified, adequately analyzed, and mitigated to a less than significant level. A SCEA must also identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be considered cumulatively considerable. Unlike an MND, a SCEA must incorporate all feasible mitigation measures from prior and applicable EIRs into the project prior to conducting the Initial Study analysis. Also, a SCEA is not required to reference, describe, or discuss growth-inducing impacts and project specific or cumulative impacts from cars and light duty truck trips on global warming or the regional transportation network.

A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA. The lead agency's decision to review and approve a project with a SCEA shall be reviewed under the substantial evidence standard.

1.2 ORGANIZATION OF THE SCEA

This SCEA is organized as follows:

1 INTRODUCTION

The Introduction describes the purpose and content of the SCEA and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

The Executive Summary provides Project information, identifies key areas of environmental concern, and includes a determination of whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

This section provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 SCEA CRITERIA AND CONSISTENCY ANALYSIS

The SCEA Criteria and Consistency Analysis demonstrates that the Project qualifies as a Transit Priority Project and is consistent with the Sustainable Communities Strategy.

5 EVALUATION OF ENVIRONMENTAL IMPACTS

The Evaluation of Environmental Impacts contains the completed Initial Study Checklist and the environmental factors that would be potentially affected by the Project. The Initial Study Checklist includes existing mitigation measures from the RTP/SCS and any other relevant plans and demonstrates why they have or have not been incorporated into the Project.

6 MITIGATION MONITORING PROGRAM

Outlines the implementation of the Project's mitigation measures and project design features and identifies enforcement and monitoring agencies responsibilities.

7 APPENDICES

Includes various documents, technical reports, and information used in preparation of the SCEA and can be found in the case file at the City of Los Angeles Department of City Planning.

1.3 CEQA PROCESS

Below is a general background and overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (http://resources.ca.gov/ceqa).

The City has prepared this SCEA to determine if the proposed Project qualifies as a TPP, is consistent with the SCS, and if it may have a significant effect on the environment. This SCEA determined that the proposed Project meets the criteria for a SCEA and would not have a significant effect on the environment. A Notice of Completion and Availability (NOC/NOA) is circulated to notify public agencies and the general public that a draft of the SCEA is available for review and comment for a period of at least 30 days. CEQA requires that the legislative body (i.e., City Council) or planning commission of the lead agency conduct a public hearing and consider all comments received prior to acting on the SCEA. The lead agency may then adopt the SCEA, provided it finds the following:

a. All potentially significant or significant effects required to be identified in the Initial Study have been identified and analyzed, and

b. With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:

    i. Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.

    ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**Sportsmen's Lodge Mixed-Use Project**
ENVIRONMENTAL CASE NO.	ENV-2021-7013-SCEA
RELATED CASES	CPC-2021-7012-DB-MCUP-WDI-SPP-SPR-VHCA

PROJECT LOCATION	**12825 Ventura Boulevard**
COMMUNITY PLAN AREA	Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass
GENERAL PLAN DESIGNATION	Neighborhood Office Commercial, Open Space, and Other Public Open Space
ZONING	C1.5-1VL-RIO and R4P-1VL-RIO
COUNCIL DISTRICT	Council District 2

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	More Song
ADDRESS	200 North Spring Street, Room 763 Los Angeles, CA 90012
PHONE NUMBER	(213) 978-1319
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APPLICANT	**Sportsmen's Lodge Owner, LLC**
ADDRESS	12825 Ventura Boulevard, Los Angeles, California 91604
PHONE NUMBER	(310) 403-3515

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology/Water Quality	☐ Transportation
☐ Biological Resources	☐ Land Use/Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities/Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology/Soils	☐ Population/Housing	☐ Mandatory Findings of Significance
		☒ None Identified

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified "residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because the SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.

More Song, City Planner	October 13, 2022
PRINTED NAME, TITLE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Sportsmen's Lodge Mixed-Use Project (Project) includes the development of three above-grade structures with a common subterranean parking structure on an approximately 5.8-acre site located at 12825 Ventura Boulevard (Project Site) in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area of the City of Los Angeles. The Project Site is currently improved with: (1) the Sportsmen's Lodge Hotel containing approximately 135,584 square feet and parking areas containing approximately 141 parking spaces; and (2) parking areas containing approximately 446 parking spaces for the adjacent Shops at Sportsmen's Lodge commercial development (The Shops Development), all of which would be removed to accommodate the Project. The Project would include new residential, restaurant, retail, and other neighborhood serving type commercial uses allowed in the C-1.5 zone, totaling 650,996 square feet. Specifically, the Project would provide 520 residential units, including 78 Very Low-Income affordable units; 18,019 square feet of restaurant uses; 27,926 square feet of retail uses; and 64,151 square feet of residential amenity and accessory space.[2] The proposed uses would be located within three low- to mid-rise above-grade structures referred to herein as Building 1, Building 2, and Building 3. Specifically, Building 1 would be a maximum of 94 feet in height, Building 2 would be a maximum of 61 feet in height, and Building 3 would be a maximum of 37 feet in height.[3] In accordance with the Los Angeles Municipal Code (LAMC) and Assembly Bill (AB) 2345,[4] the Project would provide 1,385 total vehicular parking spaces (consisting of 730 residential spaces and 655 commercial spaces for the Project and shared spaces with the adjacent The Shops Development), which would be located within three subterranean levels, and 264 bicycle parking spaces (224 long-term and 40 short-term). The Project would include an additional 49 long-term bicycle spaces that service The Shops Development that would be relocated to the Project Site, for a total of 313 bicycle parking spaces on the Project Site. Upon completion, the Project would result in up to 650,996 square feet of floor area within the Project Site with a maximum floor area ratio (FAR) of 2.84:1.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 12825 Ventura Boulevard, within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area of Los Angeles. As shown in Figure 1 and Figure 2 on pages 9 and 10, the Project Site is generally bounded by the Los Angeles River (River) to the north, Ventura Boulevard to the south, Coldwater Canyon Avenue to the west, and commercial uses to the east.

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2 The commercial floor area includes a total of 8,902 square feet of back-of-house uses, which was evenly allocated between the retail and restaurant uses.

3 Pursuant to the Ventura-Cahuenga Boulevard Corridor Specific Plan, these heights are measured to the top of the highest rooftop projection (e.g., elevator and stair overruns and other appurtenances). The parapet heights for Buildings 1, 2, and 3, measured pursuant to LAMC Section 12.03, are84 feet, 51 feet, 6 inches, and 37 feet, respectively.

4 AB 2345 amends the Density Bonus Law to expand and enhance development incentives for projects with affordable housing or senior housing components.

Figure 1
Project Location Map

Source: ArcGIS, 2021; Eyestone Environmental, 2021.

Figure 2

Aerial Photograph of the Project Site and Vicinity

Source: Apple Maps, 2021; Eyestone Environmental, 2021.

Regional access to the Project Site is provided by the Ventura Freeway (US-101), located approximately 0.75 mile north of the Project Site, State Route 170 (SR-170), located approximately 2.4 miles east of the Project Site, and the San Diego Freeway (I-405), located approximately 3.2 miles west of the Project Site. Local vehicular access to the Project Site is provided by Ventura Boulevard, Coldwater Canyon Avenue, Alcove Avenue, and Goodland Avenue.

3.2.2 Existing Conditions

The 5.8-acre Project Site is currently occupied by a five-story hotel (Sportsmen's Lodge Hotel) and associated facilities totaling approximately 135,584 square feet of floor area and approximately 587 surface parking spaces surrounding the Sportsmen's Lodge Hotel on the south, east, and north, which provide parking for the hotel and the adjacent The Shops Development. Vehicular access to the Project Site is provided via driveways along Ventura Boulevard and Coldwater Canyon Avenue. Pedestrian access to the Project Site is provided via sidewalks along Ventura Boulevard and Coldwater Canyon Avenue.

Landscaping within the Project Site includes ornamental landscaping and hardscape features. A variety of trees, shrubs, and other plantings are located throughout the Project Site, including around the perimeter of the existing hotel building, within the courtyard and parking areas, and along Ventura Boulevard. There are a total of 88 trees within the Project Site and seven street trees adjacent to the Project Site along Ventura Boulevard. These trees consist of various non-native/non-protected species and are not subject to the City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance.[5] There is one protected tree, a coast live oak (*Quercus agrifolia*) tree, located off-site, adjacent to the northeast corner of the Project Site. The Los Angeles River runs along the northern boundary of the Project Site. The Los Angeles River Path is located on the south side of the River, adjacent to the Project Site, and the Los Angeles River Zev Yaroslavsky Greenway Trail is located on the north side of the River.

As previously noted, the Project Site is located within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area.[6] The Project Site has a General Plan land use designation of Neighborhood Office Commercial, Other Public Open Space, and Open Space. The Project Site is zoned C1.5-1VL-RIO (Limited Commercial, Height District 1VL, River Improvement Overlay), with a small part of the northeast portion of the Project Site adjacent to the Los Angeles River zoned R4P-1VL-RIO (Multiple Dwelling or Parking, Height District 1VL, River Improvement Overlay). Pursuant to the LAMC, the C1.5 Zone permits limited commercial uses, including C1 (limited commercial) uses, retail, theaters, hotels, broadcasting studios, parking buildings, parks and playgrounds, and R4 (residential multiple dwelling) uses. The Height District 1VL designation for the C1.5 Zone permits an FAR of 1.5:1 and a height limit of 45 feet. The R4P Zone permits residential multiple dwelling or parking uses, including R4 uses (multiple

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5 The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873, updated February 4, 2021) applies to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species as well as Mexican Elderberry and Toyon shrub species that are native to Southern California, and excludes trees or shrubs grown or held for sale by a licensed nursery or trees planted or grown as part of a tree planting program.

6 The Los Angeles Department of City Planning is currently in the process of updating the Community Plans for the three Community Plan Areas of the Southeast San Fernando Valley, which includes the Sherman Oaks–Studio City-Toluca Lake-Cahuenga Pass Community Plan Area. A draft of the updated Community Plan has not yet been released, so for purposes of this SCEA, the analysis is limited to the designations and policies under the currently adopted Community Plan.

dwelling), churches, schools, childcare, and homeless shelter uses. The Height District 1VL designation for the R4P Zone permits an FAR of 3:1 and a height limit of 45 feet. The Project Site is located within a River Improvement Overly District. The Project Site is also located within the Ventura-Cahuenga Boulevard Corridor Specific Plan (Specific Plan) area, which includes development standards that supersede the LAMC.[7] Among other development standards, the Specific Plan permits buildings up to 30 feet in height and up to 45 feet in height for buildings designed with stepbacks. In addition, the Specific Plan permits a maximum 1.0:1 FAR, a maximum 60 percent lot coverage, and provides setback standards.[8]

The Project Site is served by a variety of public transit options provided by the Los Angeles County Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Specifically, transit options in the vicinity of the Project Site include the Universal City/Studio City station of the Metro B Line[9], located approximately 2.86 miles southeast of the Project Site; Metro Bus Line 240, located adjacent to the Project Site on the south, which is a consolidation of Bus Lines 240, 750, and a segment of 150)[10]; Metro Bus Line 167, also located approximately adjacent to the Project Site on the south; and the Downtown Area Shuttle (DASH) Van Nuys/Studio City Line, located approximately 0.4 mile north of the Project Site.

3.2.3 Surrounding Land Uses

As illustrated in Figure 2 on page 10, the Project Site is located in an urbanized area developed with a mix of low- to mid-rise commercial, residential, office, and open space uses. Land uses surrounding the Project Site include the Los Angeles River to the north and residential uses north of the River. Adjacent to the west of the Project is The Shops Development with restaurant, retail, and health club uses and a gas station. Further west, across Coldwater Canyon Avenue, are commercial properties, including restaurants in the C2-1VL-RIO zone. To the south of the Project Site, across Ventura Boulevard, is a large-scale grocery store in a C1.5-1VL-RIO/P-1VL-RIO/C2-1VL-RIO zoned area and a pet store in the C1.5-1VL-RIO zone. Immediately to the east of the Project Site is a commercial strip mall zoned C1.5-1VL-RIO. Mid-rise office buildings and low-rise retail and restaurant buildings are located further east along Ventura Boulevard, and open space associated with a golf and tennis club, zoned A1-1XL-RIO, is located further

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7 Whenever the Specific Plan contains provisions that require different setbacks, restricted yards, lower densities, lower heights, restricted uses, greater parking requirements or other greater restrictions or limitations on development than would be allowed in the LAMC, the Specific Plan shall supersede the applicable provisions of the LAMC.

8 The Los Angeles Department of City Planning is currently preparing an amendment to the Specific Plan, which would modernize regulations and improve efficiencies within the project review process, as well as expand the use of transportation funds and address internal Specific Plan inconsistencies. To speed up the corridor's post-pandemic recovery, the Department of City Planning delegated the rezoning portion of the Specific Plan Amendment to the Community Plan updates currently underway. The Specific Plan Amendment is currently in the initial CEQA compliance phase. Thus, for purposes of this SCEA, the analysis is limited to the designations and policies under the currently adopted Ventura-Cahuenga Boulevard Corridor Specific Plan.

9 In November 2018, the Metro Board of Directors approved an update to the names of all Metro Rail and Bus Rapid Transit lines. The Metro B Line was formerly the Metro Red Line.

10 The Metro bus lines on Ventura Boulevard adjacent to the Project Site are part of Metro's NextGen Bus Plan (approved in October 2020), which includes transit improvements within the vicinity of the Project Site that are intended to increase frequency and service operation. As part of Metro's NextGen Bus Plan, Bus Line 750 and a segment of Metro Bus Line 150 were consolidated with NextGen Line 240 to operate more frequent service along Ventura Boulevard adjacent to the Project Site. At Reseda Boulevard, NextGen Bus Line 150 continues to Chatsworth Station, while NextGen Bus Line 240 continues along its current route to Northridge.

east of the Project Site, north of the Los Angeles River. The area transitions to lower density residential uses away from Ventura Boulevard and the other main arterials in the Project vicinity.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As discussed above and summarized in Table 1 on page 14, the Project would replace the existing building and parking spaces on the Project Site with new residential, restaurant, and retail uses totaling 650,966 square feet, including 520 residential units (inclusive of 78 Very Low-Income affordable units) consisting of 540,900 square feet, 18,019 square feet of restaurant uses, 27,926 square feet of retail uses, and 64,151 square feet of residential amenity space. The proposed uses would be located within three low- to mid-rise above-grade structures. Structure 1 would be a mixed-use building located in the southern portion of the Project Site that would contain residential and ground floor commercial uses.

Structure 1 would consist of five to seven stories with a height of 64 feet 6 inches along Ventura Boulevard to maximum height of 94 feet in the interior portion of the Project Site (as measured to the top of the highest rooftop projection, per the Ventura-Cahuenga Boulevard Corridor Specific Plan), above a three-level subterranean parking garage. Structure 2 would be a four-story residential building with a maximum height of 61 feet, as measured to the top of the highest rooftop projection, located along the northern portion of the Project Site. Structure 3 would be a two-story commercial building with a maximum height of 37 feet located in the northwest portion of the Project Site. The heights of these buildings as measured from the lowest adjacent grade to the top of the main rooftop parapet, pursuant to LAMC Section 12.03, are 84 feet (60 feet, 6 inches along Ventura Boulevard), 51 feet, 6 inches, and 37 feet, respectively. In accordance with the LAMC, the Project would provide 1,385 vehicular parking spaces (inclusive of 730 residential spaces and 655 commercial spaces for the Project and the adjacent The Shops Development) that would be located within three subterranean parking levels. In addition, the Project would provide 264 bicycle parking spaces (224 long-term and 40 short-term) that would be located within the subterranean parking levels and at ground level throughout the Project Site. The Project would include an additional 49 long-term spaces that currently service The Shops Development that would be relocated to the Project Site, for a total of 313 bicycle parking spaces. A conceptual site plan of the Project is included in Figure 3 on page 15 and elevations of the proposed buildings are shown in Figure 4 and Figure 5 on pages 16 and 17.

3.3.1.1 Density

The portion of the Project Site zoned C1.5-1VL-RIO permits one dwelling unit per 400 square feet of lot area. The Project Site contains 252,865 square feet of lot area (based on approval and recordation of a proposed lot line adjustment), which permits 632 dwelling units. The Project proposes 520 dwelling units, which is below the maximum permitted density for the Project Site. Note that based on the amount of Very Low-Income units provided as part of the Project, a total of 855 residential units could be provided on-site inclusive of a 35 percent market rate density bonus permitted by the State Density Bonus Law (633 base density units (rounded up) X 1.35 density bonus = 855 total units (rounded up)).

Table 1
Summary of Proposed Floor Area[a]

Land Use	Proposed Development
Residential—Apartments	540,900 sf (520 du)
Residential—Amenity/Accessory	64,151 sf
Retail	27,926 sf
Restaurant	18,019 sf
Project Total	**650,996 sf**

du = dwelling units

sf = square feet

[a] *Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."*

Source: Marmol Radziner and Eyestone Environmental, 2021.

3.3.1.2 Floor Area Ratio

The Project would result in 650,966 square feet of floor area within the Project Site, representing a maximum FAR of up to 2.84:1. As noted above, the Ventura-Cahuenga Boulevard Corridor Specific Plan permits a maximum of 1:0:1 FAR on the Project Site. As permitted by State Density Bonus Law and the City's implementing ordinance codified in LAMC 12.22.A.25, the Project requests approval of a Density Bonus incentive to permit an increase to 2.84:1 FAR.

3.3.1.3 Height

As described above and illustrated in the Building Elevations included in Figure 4 and Figure 5 on pages 16 and 17, the proposed uses would be located within three low- to mid-rise above-grade structures referred to as Building 1, Building 2, and Building 3. Specifically, Building 1 would be a maximum of 94 feet in height, Building 2 would be a maximum of 61 feet in height, and Building 3 would be a maximum of 37 in height.[11] The Specific Plan permits 30 feet in height and up to 45 feet in height for buildings designed with stepbacks. In addition, the Project is subject to the transitional height limits set forth in LAMC Section 12.21.1.A10 due to proximity to an Open Space zone (Los Angeles River). As permitted by State Density Bonus Law and the City's implementing ordinance codified in LAMC 12.22.A.25, the Project requests approval of a Density Bonus incentive to permit a maximum Project height of 94 feet and a waiver of development standard to deviate from the transitional height limits.

[11] As previously described, these heights include rooftop projections, as required by the Specific Plan. Pursuant to LAMC Section 12.03, which defines height as measured to highest point of the roof, structure, or the parapet wall, whichever is highest, Building 1 would reach a maximum height of 84 feet, Building 2 would be 51 feet, 6 inches, and Building 3 would remain 37 feet.

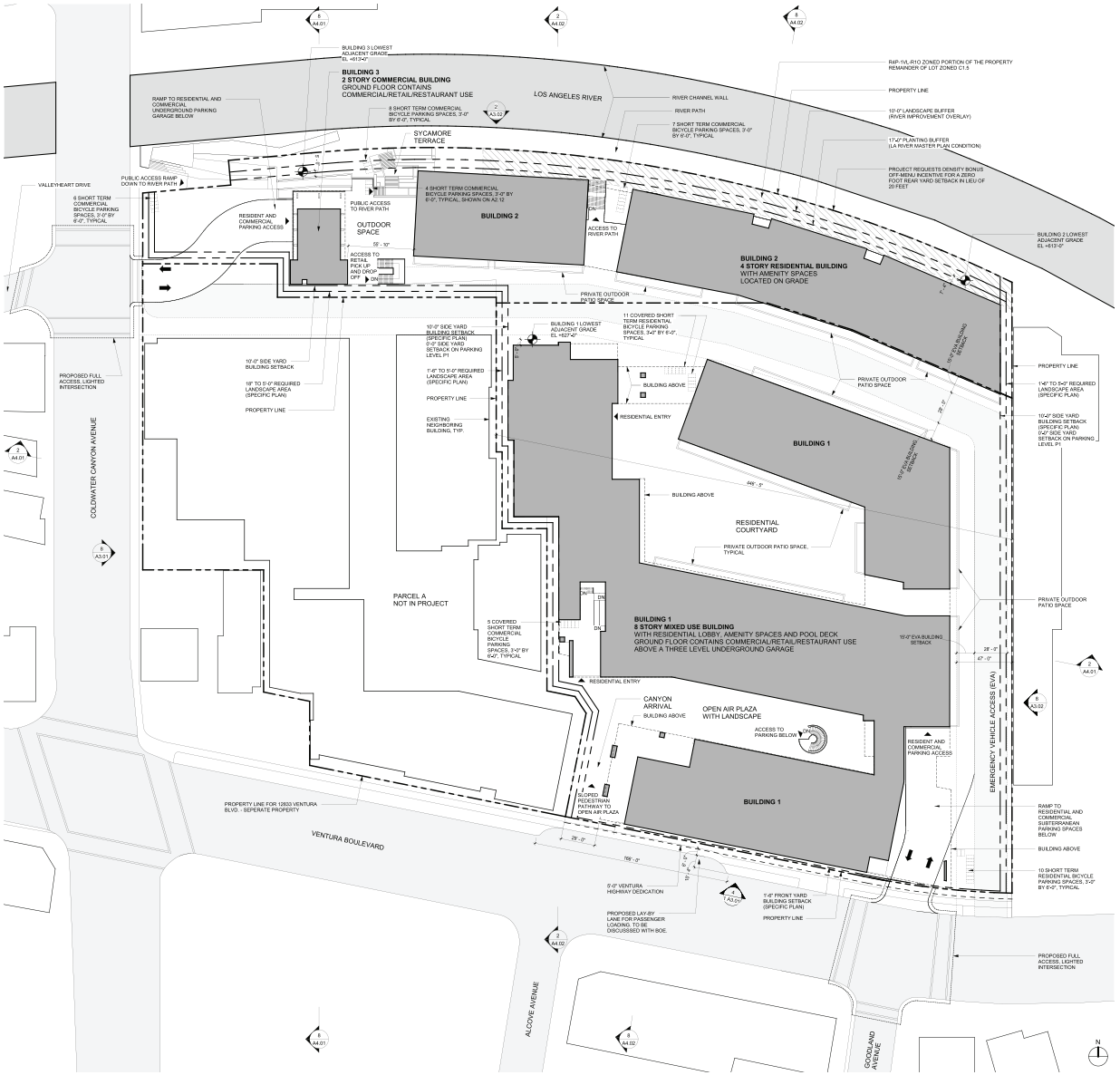
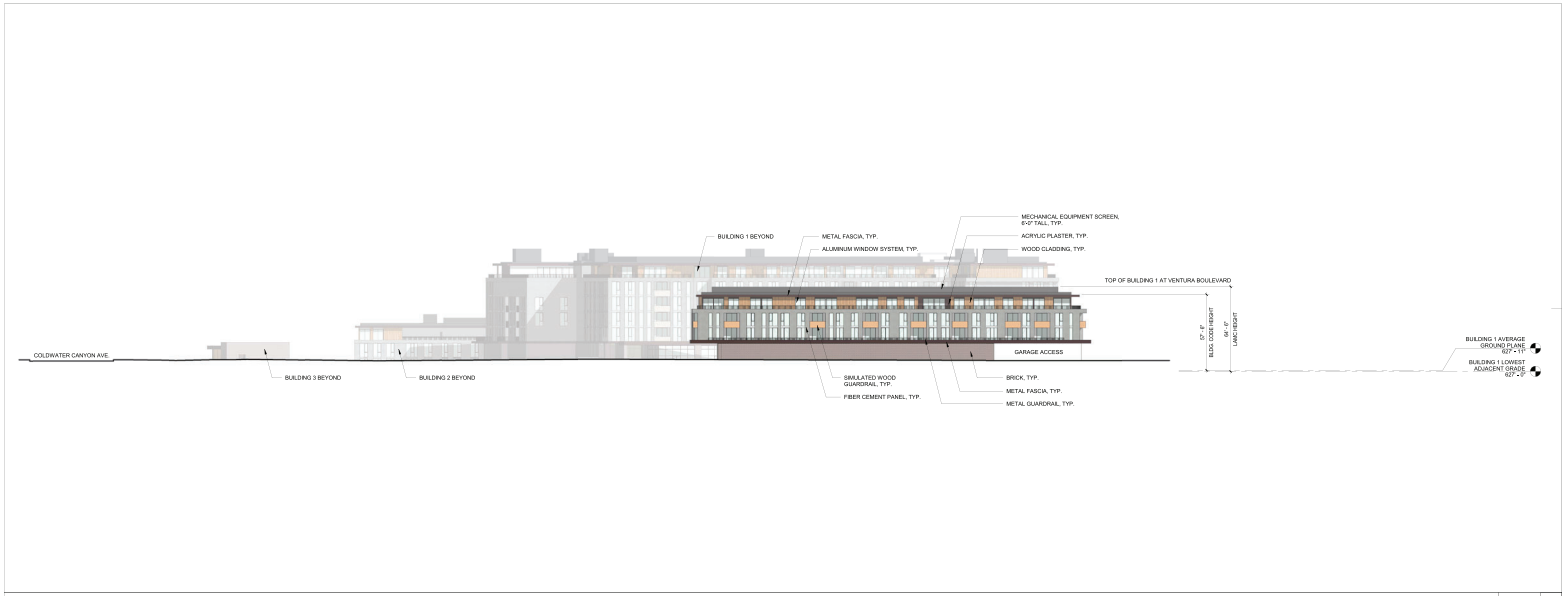
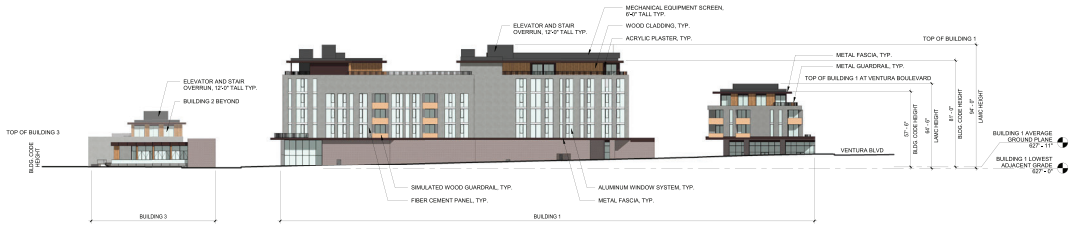


Figure 3
Conceptual Site Plan

Source: Marmol Radziner, 2021.



SOUTH EXTERIOR ELEVATION | 2



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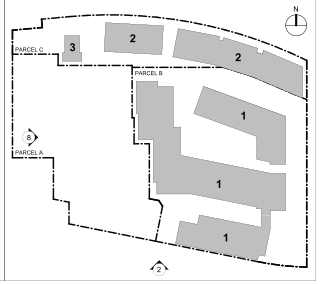

Figure 4
Building Elevations – South and West

Source: Marmol Radziner, 2021.

Figure 5
Building Elevations – North and East

Source: Marmol Radziner, 2021.

3.3.1.4 Setbacks

The Specific Plan and LAMC require a minimum 18-inch front yard along Ventura Boulevard, 10-foot side yards along the internal lot lines, and a 20-foot rear yard. The Project would provide a front yard and side yards in compliance with the Specific Plan's requirements, with the exception of on Parking Level P1.[12] As permitted by State Density Bonus Law and the City's implementing ordinance codified in LAMC 12.22.A.25, the Project requests approval of waivers of development standards to permit 0-foot side yards at the Project's Parking Level P1 as well as a 0-foot rear yard in lieu of 20 feet.[13]

3.3.2 Design and Architecture

The Project would be designed to provide an indoor-outdoor mixed-use development that would reflect the rich recreational history of the Sportsmen's Lodge while providing housing, retail, and restaurant uses in a setting inspired by the native landscape of the San Fernando Valley and the Los Angeles River Basin. The Project would incorporate the Los Angeles River as a focal point, featuring new passive recreational areas adjacent to the River. The Project Site would connect to the River via a cascade of steps with elevated seating areas, which would tie in to a larger system of pedestrian circulation and landscaping distributed over the entire Project Site, thereby increasing access to the River and providing outdoor amenities to the Project residents and the public. Residential and amenity uses located in the northern portion of the Project Site would be oriented toward the River, creating an attractive and usable interface. Landscaped walkways and courtyards, including an open-air retail plaza, a large residential courtyard, and an entry plaza, would create openness and would provide gathering areas for residents and visitors. All parking, loading, and service areas would be located in the subterranean parking levels to maximize the landscaped public spaces.

The Project Site would be accessible from the three public frontages: the Los Angeles River Path, Coldwater Canyon Avenue, and Ventura Boulevard, and would include a design that responds to each of these frontages. To reduce the architectural massing along the public frontages, the facades of the three proposed structures would step back as they rise in height to a maximum of seven stories at the center of the Project Site. To further reduce the building mass and introduce texture, the facades would be articulated through inset residential balconies, light wells, and landscaping. In addition, the ground-level retail and restaurant uses would feature storefront glazing to provide maximum visibility and natural light. The Project would incorporate a material palette comprised of textured fiber cement cladding, plaster, brick, anodized aluminum, and wood. Reflective of the midcentury modern history of Los Angeles, these dark and natural hues would help to anchor the Project structures within the larger landscape design and create a balance with the large, glazed areas of the façade. Overall, building design and site planning would create a unified site that would complement and enhance the surrounding area.

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12 The Project's Parking Level P1 primarily contains subterranean parking along with some residential units. Due to the elevation differential across the Project Site, Parking Level P1 daylights at the rear of the Project Site, which qualifies it as a story and subject to setback requirements.

13 Building 2 would be set back approximately 20 feet from the Project Site's rear property line; however, this setback area is within the R4P-zoned portion of the Project Site. The R4P zone is classified as a more restrictive zone that the remainder of the Project Site's C1.5 zoning, and therefore, the area within the R4P zone cannot be utilized to meet the Project's rear yard setback requirement, necessitating the request for a waiver of development standards.

3.3.3 Open Space and Landscaping

The Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 79,366 square feet, including approximately 66,816 square feet of common open space consisting of approximately 52,520 square feet of exterior common open space and approximately 14,296 square feet of interior common open space; and 12,550 square feet of private open space, which would exceed the requirements of the LAMC to provide a minimum of 57,225 square feet of open space. Of the total open space, approximately 21,039 square feet would be accessible to the public. As shown in Figure 6 on page 20, the Project Site would include a series of landscaped pedestrian passages and courtyards that would connect the areas within the Project Site and provide pedestrian access to the Los Angeles River Path. A large residential courtyard would be located toward the interior of the Project Site, adjacent to Building 1 that would feature seating for outdoor dining, lounge seating, and landscaping. In addition, a landscaped pedestrian entry plaza would be located along Ventura Boulevard that would provide access to an open-air retail plaza. A publicly accessible outdoor plaza would be located between Building 2 and Building 3, which would connect to a landscaped and terraced open space area directly connecting to the Los Angeles River. The Project would also provide a new public connection to the Los Angeles River via Coldwater Canyon Avenue. As called for by the River Improvement Overlay (RIO) District regulations, the Project would treat the River as a focal point, thereby establishing a positive interface between the Project Site and the River, providing an aesthetically pleasing environment for pedestrians and bicyclists accessing the River area, and promoting the River identity. Specific measures that would be implemented in support of the RIO district policies include the use of appropriate landscaping and lighting and the screening of mechanical equipment and trash enclosures. Additional open space and landscaping would be provided on the roof (Level 7) of Building 1, which would include a pool and deck, and on the roof (Level 3) of Building 2, which would include an amenity deck overlooking the Los Angeles River.

The Project would remove all of the existing on-site landscaping, including the non-native/non-protected trees on the Project Site, and four of the street trees along Ventura Boulevard. Street trees would be replaced in accordance with the Los Angeles Bureau of Street Services, Urban Forestry Division.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided with a two-way vehicular ramp along Coldwater Canyon Avenue located in the northwest corner of the Project Site and a two-way ramp along Ventura Boulevard located in the southeast corner of the Project Site. Both ramps would provide access to residential and commercial subterranean parking levels. Emergency vehicle access would be provided via a driveway along the eastern boundary of the Project Site that is accessed from Ventura Boulevard. - Primary pedestrian access to the residential and commercial uses would be provided via a pedestrian entry plaza on Ventura Boulevard. Pedestrian access to the Los Angeles River Path would be provided via a ramp at the northwest corner of the Project Site along Coldwater Canyon Avenue, as well as from the terraced landscape area described in Section 3.3.3

The proposed uses would be supported by approximately 1,385 total vehicular parking spaces (inclusive of 730 residential spaces and 655 spaces for the Project's commercial uses and the adjacent The Shops Development) that would be contained within three subterranean levels. The Project would also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas. In addition, the Project would provide 264 bicycle parking spaces (including 224 long-term spaces and 40 short-term spaces), which would be located in the

Figure 6
Landscape Plan

Source: Marmol Radziner, 2021.

subterranean parking levels and at ground level throughout the Project Site. In addition to the required bicycle parking, the Project proposes the relocation of 49 existing long-term bicycle parking spaces serving the existing The Shops Development located to the west of the Project Site. These spaces would be relocated to the subterranean parking levels.

3.3.5 Lighting and Signage

The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting, including lighting fixtures on the pool decks, would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto neighboring properties. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC regulations, as applicable. No new billboards or other off-site advertising are proposed as part of the Project. The Project would also not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property. A sign approval as required by the Ventura-Cahuenga Boulevard Corridor Specific Plan would be requested at a later date when specific commercial tenants have been selected.

3.3.6 Site Security

The Project would include various security features throughout the Project Site. A closed-circuit camera system would be installed and a keycard would be required for the residential uses. In addition, the buildings, walkways, and entry points would be properly lit to further the safety and visibility of the Project Site. Furthermore, the design of the Project would enhance safety by reducing dark corners and inconspicuous areas. In addition, entry points to the residential building would be open to and in view of surrounding areas, which would be designed to encourage community gathering.

3.3.7 Project's Relationship to Shops at Sportsmen's Lodge Development

As noted above, the Project Site is adjacent to the recently completed The Shops Development, which received City approval of its entitlements in 2017, including approval of a Specific Plan Project Permit Compliance and a Project Permit Adjustment. This development has been fully constructed and issued a temporary certificate of occupancy.

The conditions of approval associated with The Shops Development reflect the current existing property line boundaries. In connection with the Project, a lot line adjustment is being proposed that would establish the Project Site's proposed property lines, resulting in The Shops Development being located on its own separate legal parcel. In addition, the current existing surface parking spaces for The Shops Development are proposed to be relocated to within the Project's new subterranean parking levels. As a result, several of The Shops Development's existing conditions of approval have been clarified through a Letter of Clarification issued by the Planning Department, addressing the relationship between the existing Shops Development and the proposed Project. The Letter of Clarification addresses these conditions based on the new resulting lot lines should the City approve the proposed Lot Line Adjustment modifying the boundary line between The Shops Development and the proposed Project. After effectuation of the proposed Lot Line Adjustment, notwithstanding the issues to be addressed in the Letter of Clarification, The Shops Development would remain consistent with the provisions of the Ventura–Cahuenga Boulevard Corridor Specific Plan.

The Letter of Clarification addresses various conditions contained in The Shops Development approvals, including but not limited to, maximum permitted lot coverage, FAR, and relocation of The Shops Development required parking to the Project's subterranean parking garage. Certain existing landscaping conditions are also addressed to reflect the new site configuration for The Shops Development. As stated above, all required clarifications to The Shops Development approvals are consistent with the Ventura–Cahuenga Boulevard Corridor Specific Plan limitations and no deviations to the Specific Plan development standards are required. Furthermore, as previously stated, The Shops Development has been previously approved, constructed, and issued a temporary Certificate of Occupancy, and no new development activity would be authorized by these revised conditions.

3.3.7 Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen). These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project include, but would not be limited to the following: photovoltaic (solar) cell-ready; electric vehicle charging stations; material recycling stations; highly efficient HVAC systems; energy-efficient wall insulation and glazing units; WaterSense-labeled, or functionally equivalent, plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances, or equivalent rating as may be applied at the time of construction; and water-efficient landscape design (i.e., grouping plants according to their water needs, and the use of native and low-water plants). In addition, in accordance with the City's Low Impact Development (LID) ordinance requirements, the Project would use captured stormwater runoff for irrigation of the new landscaping around the Project Site. Provisions for harvesting and filtering greywater for landscape irrigation would also be provided, as allowed by the City. Additionally, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials where applicable.

3.3.8 Anticipated Construction Schedule and Parking Phasing

Construction of the Project would commence with site clearance and demolition of the existing structures and surface parking. This phase would be followed by grading and excavation for the subterranean

parking levels. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to occur over an approximately 43-month period and be completed in 2027. The estimated maximum depth of excavation for the subterranean parking and building foundations would be approximately 52 feet below grade, and it is estimated that approximately 431,140 cubic yards of soil would be exported from the Project Site.

As noted above, the Project's subterranean parking levels would include the 446 parking spaces required for use by The Shops Development, and which are currently located at grade within the proposed Project Site. During construction of the Project, a phased parking plan would be implemented to maintain temporary parking for The Shops Development during construction and until the Project's permanent parking facilities have been completed. The phased parking plan includes four phases:

Phase 1—The area immediately surrounding the existing hotel will be fenced off and separated from the existing surface parking areas serving The Shops Development. These existing surface parking areas will remain available for The Shops Development during demolition of the hotel and parking area south of the hotel. Access to the parking areas for The Shops Development will utilize existing curb cuts at the eastern driveway on Ventura Boulevard and at Coldwater Canyon Avenue. Construction access for the Project Site will be separate from the access to The Shops Development and will utilize the existing curb cut at the western driveway on Ventura Boulevard. After the hotel structure is removed and the site cleared, the site will be paved and made ready for temporary surface parking with a minimum of 446 spaces.

Phase 2—Upon completion and commencement of operations at the new temporary surface parking area in Phase 1, the north area of the Project Site will be reconfigured to operate as a temporary surface parking lot accessed only from the existing curb cut on Coldwater Canyon Avenue. Mechanical parking stackers will be installed, in addition to standard, compact, and handicapped parking spaces, to maintain the required 446 total spaces for The Shops Development. Construction access for the Project Site will utilize the existing curb cuts on Ventura Boulevard.

Phase 3—Upon completion and operation of the temporary surface parking area in Phase 2, construction will commence to construct the subterranean garage and then subsequent commercial and residential structures. Construction access for the Project Site will continue to utilize the western driveway on Ventura Boulevard.

Phase 4—Once occupancy is allowed in the Project's subterranean parking levels, the 446 required parking spaces for The Shops Development will be relocated to these levels. The temporary surface parking area constructed for Phase 2 will be removed to allow the balance of construction for the Project. Access for The Shops Development and initial phases of the Project will be limited the existing curb cut at the western driveway on Ventura Boulevard until the Project is completed and the existing curb cut on Coldwater Canyon Avenue is reopened.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The SCEA will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary

entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Project Permit Compliance Review with the Ventura-Cahuenga Boulevard Corridor Specific Plan, including a request for shared parking between the Project's proposed commercial uses and commercial uses associated with the adjacent Shops at Sportsmen's Lodge Development.

- Site Plan Review for the development of 520 residential units.

- Density Bonus Compliance Review to permit the following development incentives/ concessions and/or waivers of development standards (a) to permit a 2.84:1 floor area ratio in lieu of a 1.0:1 floor area ratio permitted by Section 6.B.3 of the Ventura-Cahuenga Boulevard Corridor Specific Plan, (b) to permit a maximum height of 94 feet in lieu of 30 feet otherwise permitted by Section 7.E.1.f of the Ventura-Cahuenga Boulevard Corridor Specific Plan, (c) to permit 402 accessible standard parking stalls in lieu of 520 accessible standard parking stalls (1 per unit) otherwise required by LAMC Section 12.21.A5.c; (d) to permit reduced 0-foot side yards on Parking Level P1 in lieu of 10 feet otherwise required by Section 7.A.3.b of the Ventura-Cahuenga Boulevard Specific Plan; (e) to waive the transitional height limits set forth in LAMC Section 12.21.1 A.10 due to the Site's proximity to an Open Space zone (Los Angeles River); (f) to waive the passageway requirements of LAMC Section 12.21.C.2; and (g) to permit a reduced 0-foot rear yard in lieu of 20 feet otherwise required by Section 7.A.3.c of the Ventura-Cahuenga Boulevard Corridor Specific Plan.

- Parcel Map Exemption (PMEX) for a Lot Line Adjustment between two adjacent lots that would create a 252,865-square-foot Project Site.

- Letter of Clarification to the existing Shops Development Project Permit Compliance approval to clarify certain conditions of approval (in the event the City approves the requested Project approvals and Lot Line Adjustment) while still maintaining compliance with all Specific Plan development standards.

- Main Conditional Use Permit for alcohol sale and consumption.

- Waiver of Dedication and Improvement (WDI) to permit the waiver of the 5-foot dedication on the portion of Ventura Boulevard adjoining the Project Site to the south as required for a Boulevard II under the City's 2035 Mobility Plan, to provide for a rideshare pick-up/drop-off area along Ventura Boulevard in front of the Project Site.

- Master Sign Plan Approval (to be requested subsequently upon commercial tenant selection).

- Haul Route Approval.

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, street tree removal permit, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- United States Army Corps of Engineers
- Los Angeles County Flood Control District
- South Coast Air Quality Management District (SCAQMD)

4 SCEA CRITERIA AND CONSISTENCY ANALYSIS

4.1 TRANSIT PRIORITY PROJECT CRITERIA

Senate Bill (SB) 375 provides CEQA streamlining benefits to qualifying Transit Priority Projects (TPPs). Section 21155(b) of the Public Resources Code defines a TPP for SCEA purposes as a project that meets the following three criteria:

1. Contains at least 50 percent residential use, based on total building square footage (and if the project contains between 26 and 50 percent of non-residential uses, a floor area ratio of not less than 0.75);

2. Provides a minimum net density of at least 20 dwelling units per acre; and

3. Is located within one-half mile of a "major transit stop" or "high-quality transit corridor" included in the 2020–2045 RTP/SCS

Consistency with Criterion #1: Contains at least 50 percent residential use, based on total building square footage (and if the project contains between 26 and 50 percent of non-residential uses, a floor area ratio of not less than 0.75)

The Project would construct three new buildings on the Project Site that would contain a total floor area of 650,996 square feet, including 540,900 square feet of residential uses and 110,096 square feet of other uses including 27,926 square feet of retail uses, 18,019 square feet of restaurant uses, and 64,151 square feet of residential amenity and accessory space. Accordingly, the Project's residential floor area would comprise approximately 83 percent of the Projects' new building square footage. ***Thus, the Project would contain at least 50 percent residential use based on total building square footage and would be consistent with Criterion #1.***

Consistency with Criterion #2: Provides a minimum net density of at least 20 units per acre.

The Project proposes 520 dwelling units on a 5.8 acre (252,856 square foot) site, resulting in an overall net residential density of 89.6 units per acre. ***Thus, the Project would provide a minimum net density of at least 20 units per acre and would be consistent with Criterion #2.***

Consistency with Criterion #3: Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

A major transit stop is defined in PRC Section 21064.3 as "[a] site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods". Furthermore, pursuant to PRC Section 21155(b), it also includes major transit stops that are included in the applicable regional transportation plan. A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The City of Los Angeles defines peak hours as between 6:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 7:00 P.M.

The Project Site is located on Ventura Boulevard and is served by several bus lines, including Metro Bus Line 240 (which is a consolidation of Bus Lines 240, 750, and a segment of 150) and Metro Bus Line 167.[14] According to the Metro schedule, effective February 20, 2022, Metro Bus Line 240, which traverses Ventura Boulevard between Universal City Station and Reseda Boulevard, continuing along Reseda boulevard to Northridge, provides average peak hour headways of approximately 12 minutes in both directions.[15] When Metro's NexGen Bus Plan is fully implemented, headways are expected to be 10 minutes during the weekday morning and evening peak commute times, and throughout the midday hours, in both directions. ***Accordingly, Ventura Boulevard meets the statutory definition of a high quality transit corridor and the Project is consistent with Criterion #3.***

4.2 SUSTAINABILITY COMMUNITIES CONSISTENCY ANALYSIS

SB 375 provides CEQA streamlining benefits to qualifying TPPs which demonstrate consistency with a Sustainable Communities Strategy (SCS), which, if implemented, would achieve the State's greenhouse gas (GHG) reduction targets. For purposes of projects in the SCAG region, a qualifying TPP must demonstrate consistency with the general use designation, density, building intensity, and applicable policies specified for the project area in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), given the California Air Resources Board's (CARB's) acceptance of SCAG's determination dated October 30, 2020 that the 2020–2045 RTP/SCS would, if implemented, achieve the GHG emission reduction targets for year 2035.

The 2020–2045 RTP/SCS presents strategies and measures that are consistent with local jurisdictions' land use policies and incorporates best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). It is important to note, however, that SCAG does not have a direct role in implementing the SCS through decisions about what type of development goes where. The role of the 2020–2045 RTP/SCS in guiding growth is explained in more detail in *Chapter 3, A Path to Greater Access, Mobility, and Sustainability*, of the 2020–2045 RTP/SCS.

4.2.1 Use Designation, Density, and Building Intensity

The 2020–2045 RTP/SCS incorporates center focused placemaking as a land use tool to create dynamic, connected built environments that support multimodal mobility, reduced reliance on single-occupancy vehicles, and reduced GHG. This approach supports attractive and functional places for residents of the region to live, work, and play, with priority placed on urban and suburban infill sites in existing/planned service areas. These centers are typically human-scale, compact, and pedestrian oriented with a variety and housing types and affordability options. To facilitate center focused placemaking, the 2020–2045 RTP/SCS identifies Priority Growth Areas (PGAs) across the SCAG region. PGAs are locations where many of the 2020–2045 RTP/SCS strategies can be fully realized. These PGAs include Job Centers,

[14] Metro's NextGen Bus Plan (approved in October 2020) includes transit improvements within the vicinity of the Project Site that are intended to increase frequency and service operation. As part of Metro's NextGen Bus Plan, Bus Line 750 and a segment of Metro Bus Line 150 were consolidated with NextGen Line 240 to operate more frequent service along Ventura Boulevard adjacent to the Project Site. At Reseda Boulevard, NextGen Bus Line 150 continues to Chatsworth Station, while NextGen Bus Line 240 continues along its current route to Northridge.

[15] The most recent schedule for Metro Bus Line 240, which became effective on February 20, 2022, as well as a description of the Project's consistency with SB 375's Transit Priority Project criteria, is included in Appendix L of this SCEA.

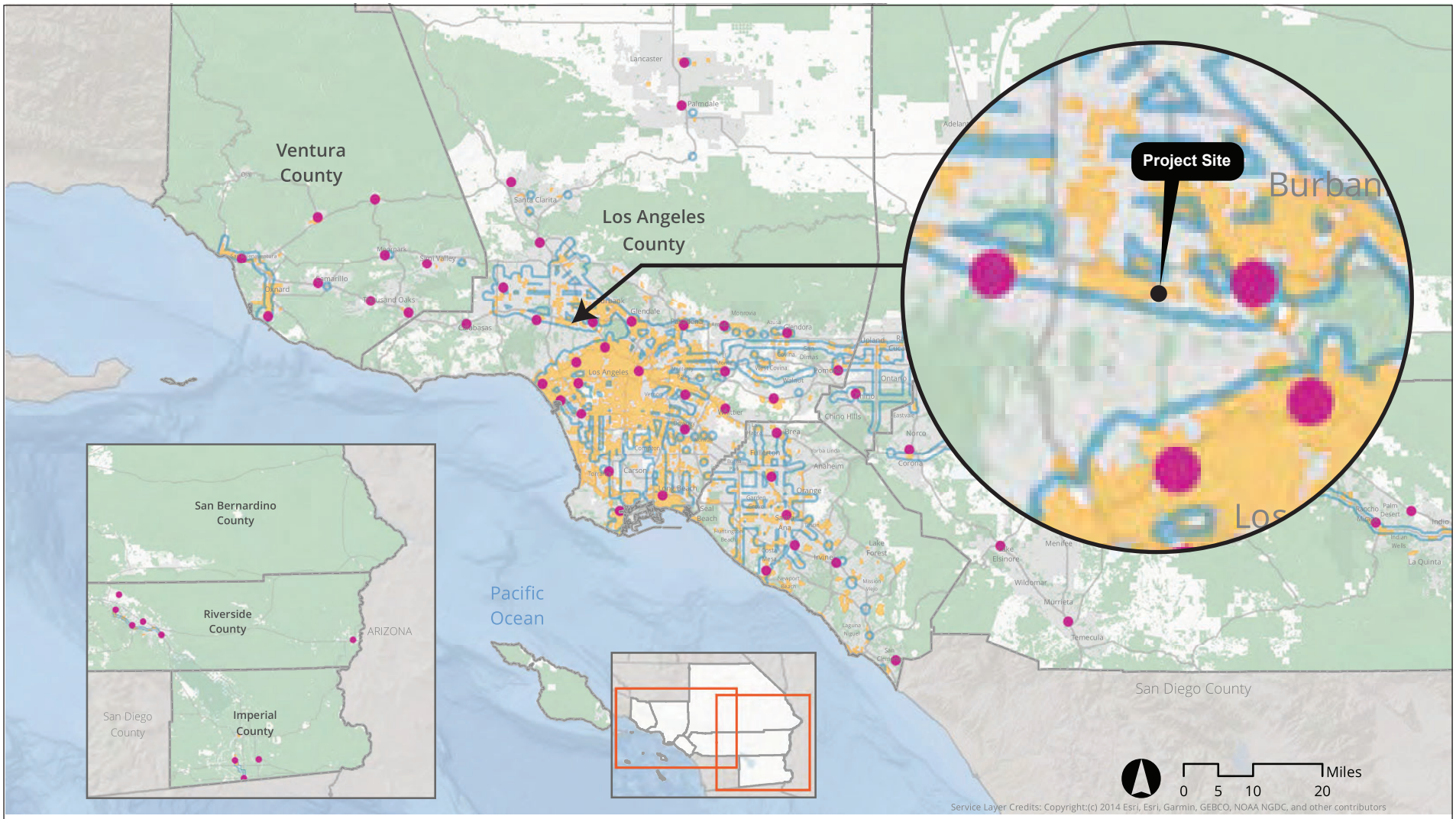
Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs). According to the 2020–2045 RTP/SCS, PGAs account for only 4 percent of region's total land area, but implementation of SCAG's recommended growth strategies will help these areas accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2020 and 2045. The more compact form of regional development implemented through PGAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the regionals resources areas. PGAs do not limit any particular development project from being built in any particular location. However, they are intended to guide general growth patterns, which the City of Los Angeles accomplishes through its General Plan and Community Plans. In addition, while the 2020–2045 RTP/SCS does not require individual TPPs to be located within PGAs, the expectation is that most of the more intensive development in the region would be within one or more PGAs. The PGAs are shown in Exhibit 3-4 through Exhibit 3-10 of the of the 2020–2045 RTP/SCS.

The Project's location relative to each of the PGAs is shown in Figure 7 through Figure 13 on pages 29 through 35 of this SCEA. As show in Figure 11, Figure 12, and Figure 13, the Project Site is located within the boundaries of an HQTA and an NMA, and along a Livable Corridor, as described below:

- High Quality Transit Areas: HQTAs are corridor-focused PGAs within one-half mile of an existing or planned fixed transit stop or bus transit corridor where buses operate at a frequency of at least every 15 minutes during peak commute hours. HQTAs represent under 3 percent of the region's acreage but are projected to be home to over 51 percent of new households between 2016 and 2045. New developments within HQTAs should respond to the existing physical conditions of the surrounding area, preserving existing development patterns and neighborhood character while providing a balance of modal and housing choices. The Project site is located within a HQTA due to its proximity to Ventura Boulevard (a High Quality Transit Corridor with less than 15 minute peak hour bus service).

- Neighborhood Mobility Areas: NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds, with a focus on creating, improving, restoring, and enhancing safe and convenient connections to a variety of land uses (e.g., schools, shopping, services, places of worship, parks, and greenways). Safer and shorter multimodal trips are encouraged to reduce the reliance on single occupancy vehicles. This is achieved in NMAs through increased density, mixed land uses, neighborhood design, enhanced destination accessibility, and reduced distance to transit. The Project site is located within a mapped NMA.

- Livable Corridors: Livable Corridors strategy encourages increased density at nodes along key corridors. This strategy focuses on transit improvements, which include dedicated or semi-dedicated bus lanes, enhanced bus shelters, real-time travel information, and off-bus ticketing; active transportation improvements, which would support safe bicycling and walking; and land use policies, which includes developing mixed-use retail centers at key nodes and increasing neighborhood-oriented retail at intersections. The Project site is located along Ventura Boulevard, a designated Livable Corridor.



Priority Growth Areas vs. Regional Growth Constraints

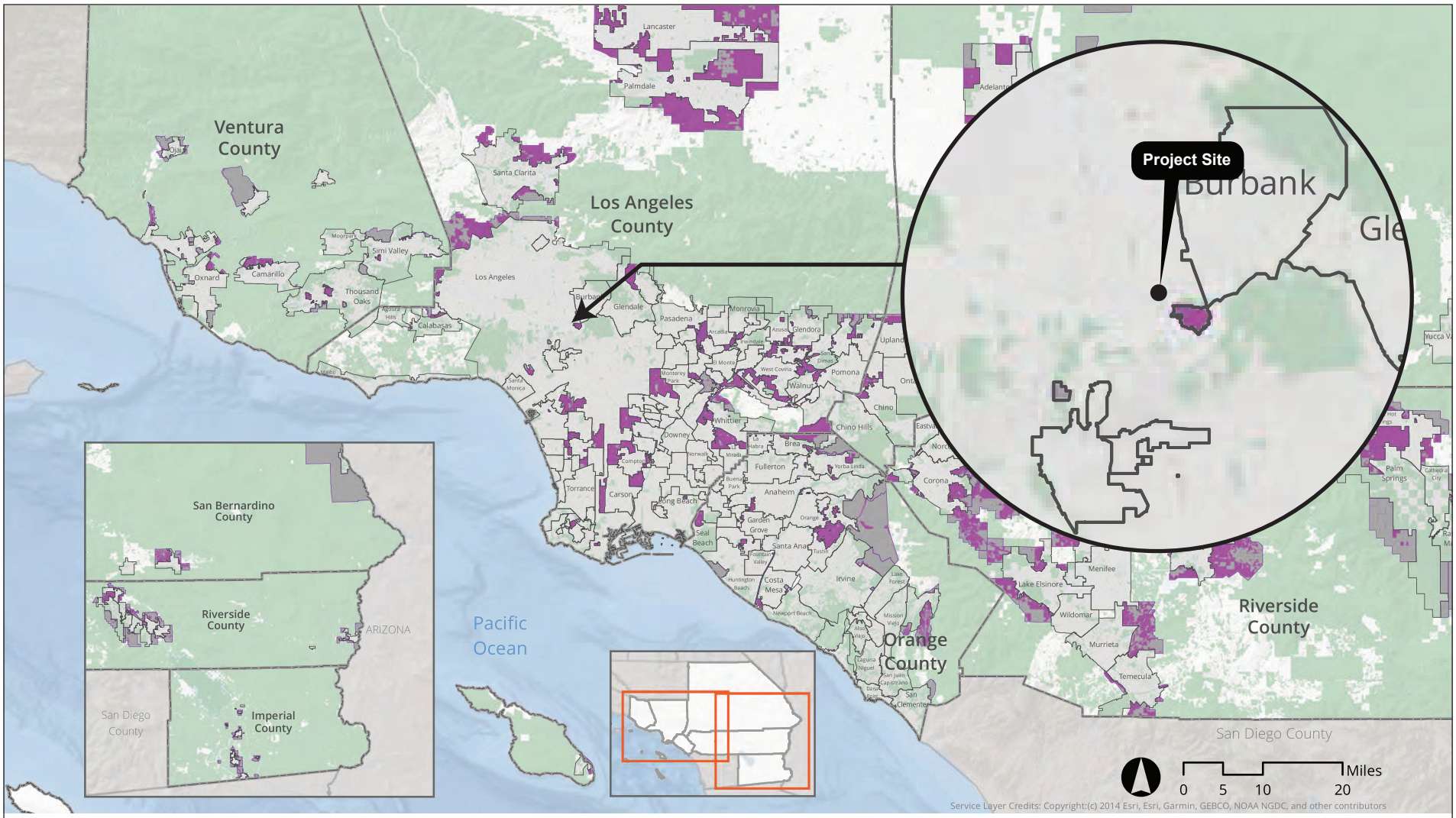
- Job Center
- High Quality Transit Area
- Neighborhood Mobility Areas
- Regional Growth Constraints

Note: SCAG used locally informed data elements to determine Regional Growth Constraints including the absolute constraint areas shown in the map such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details on these and the variable constraints used in plan development.

Figure 7

Priority Growth Areas vs. Regional Growth Constraints

Source: CalBRACE, California Department of Conservation, CPAD, CCED, County Transportation Commissions, NOAA Coastal Services Center, SCAG, 2019.



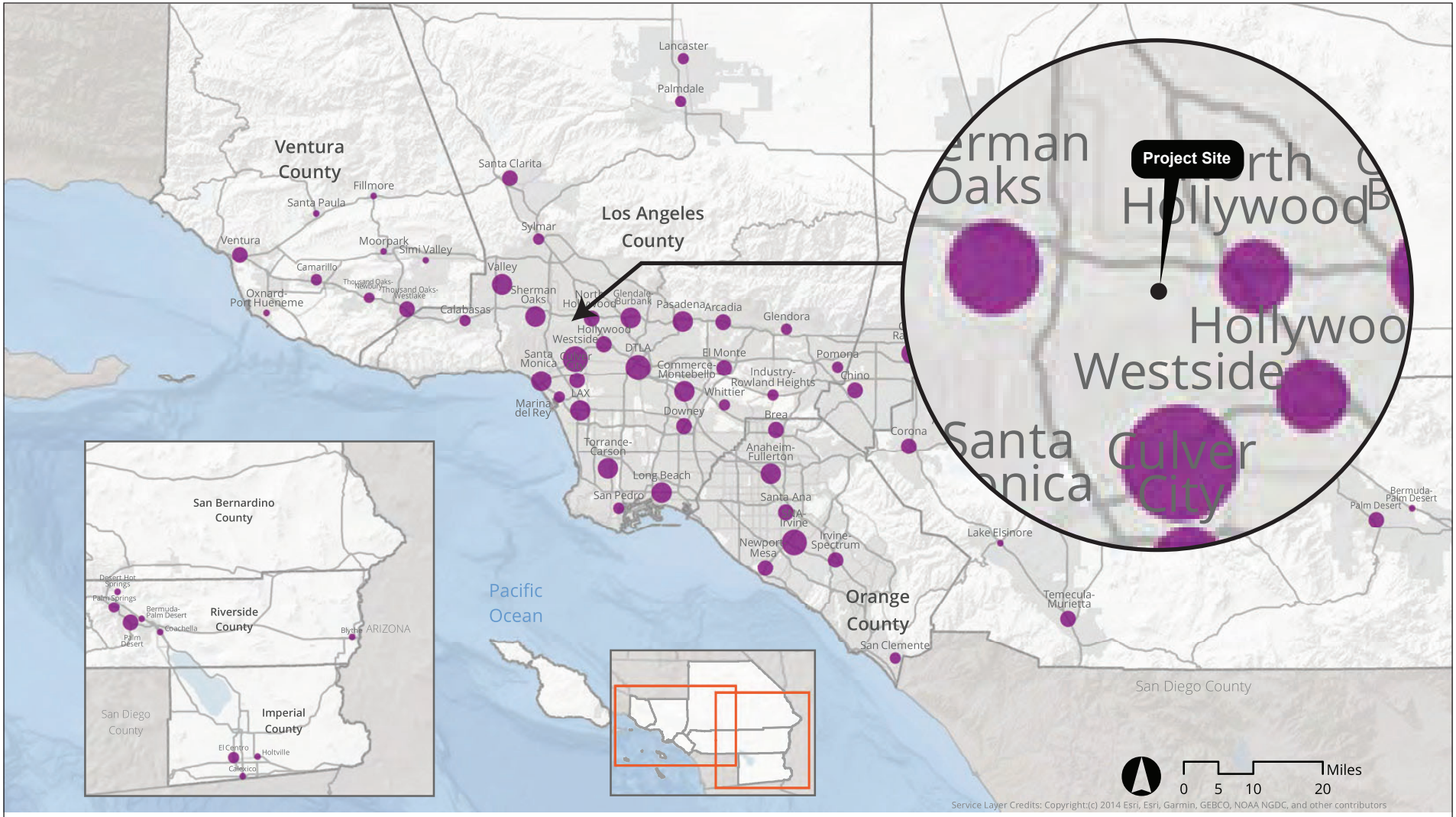
County Boundaries
City Boundaries
Sphere of Influence
Regional Growth Constraints

Note: SCAG used locally informed data elements to determine Regional Growth Constraints including the absolute constraint areas shown in the map such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details on these and the variable constraints used in plan development.

Figure 8

Priority Growth Area - Spheres of Influence

Source: Counties and local jurisdictions LAFCO in SCAG region, 2018.



SCAG Region Proposed 2020 RTP/SCS Job Centers (Total Employment)

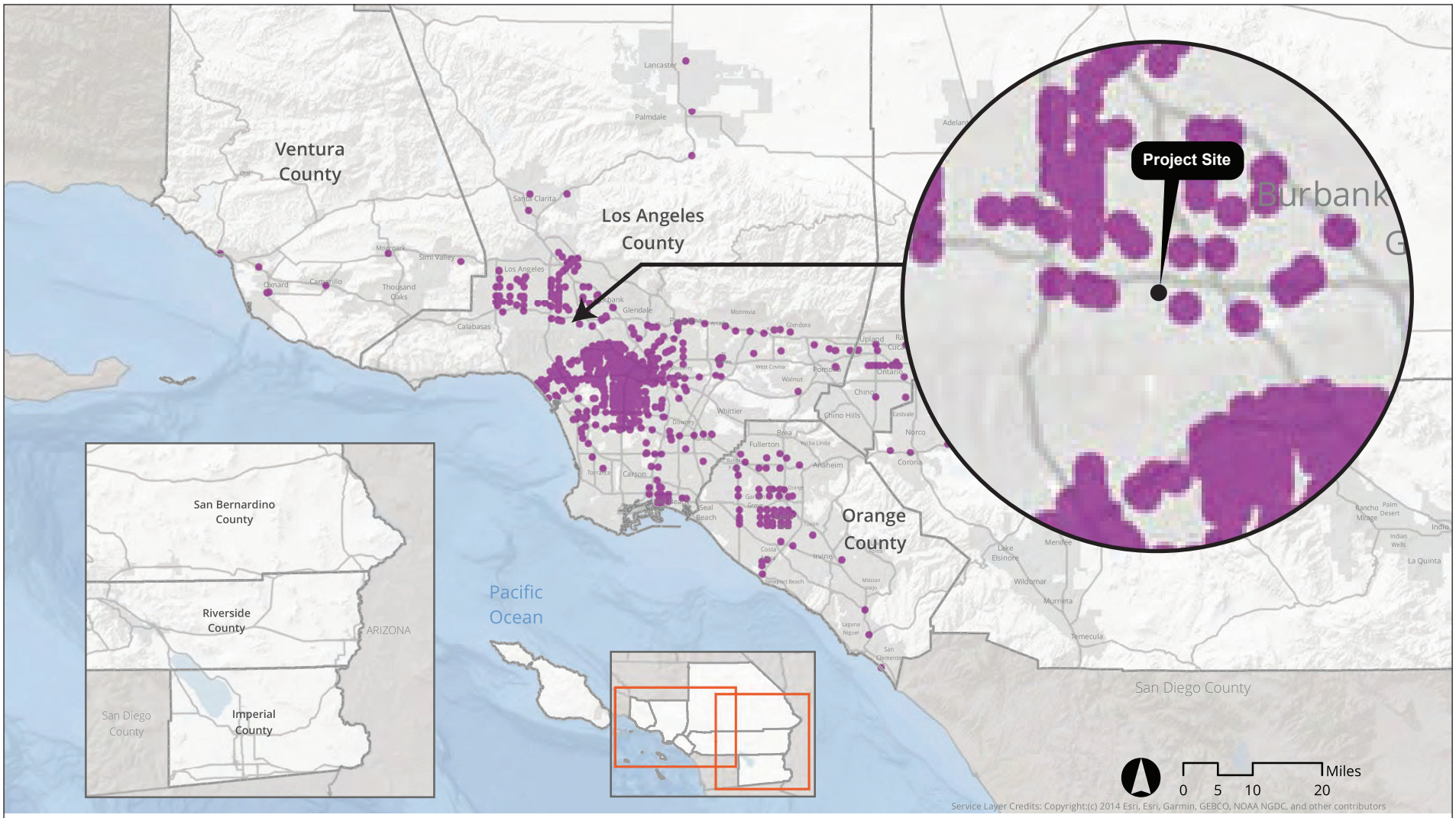
- Less than 10,001 (17)
- 10,001 - 25,000 (22)
- 25,001 - 50,000 (19)
- 50,001 - 150,000 (11)
- More than 150,000 (3)

Notes:
(1) Centers are areas with denser employment than their surroundings.
(2) Dots represent the total employment in each center, not center boundaries.
(3) Names are intended to be illustrative and may not reflect all the jurisdictions in which a center fully lies.

Figure 9

Priority Growth Area - Job Centers

Source:SCAG, 2019.



Transit Priority Areas (2045)

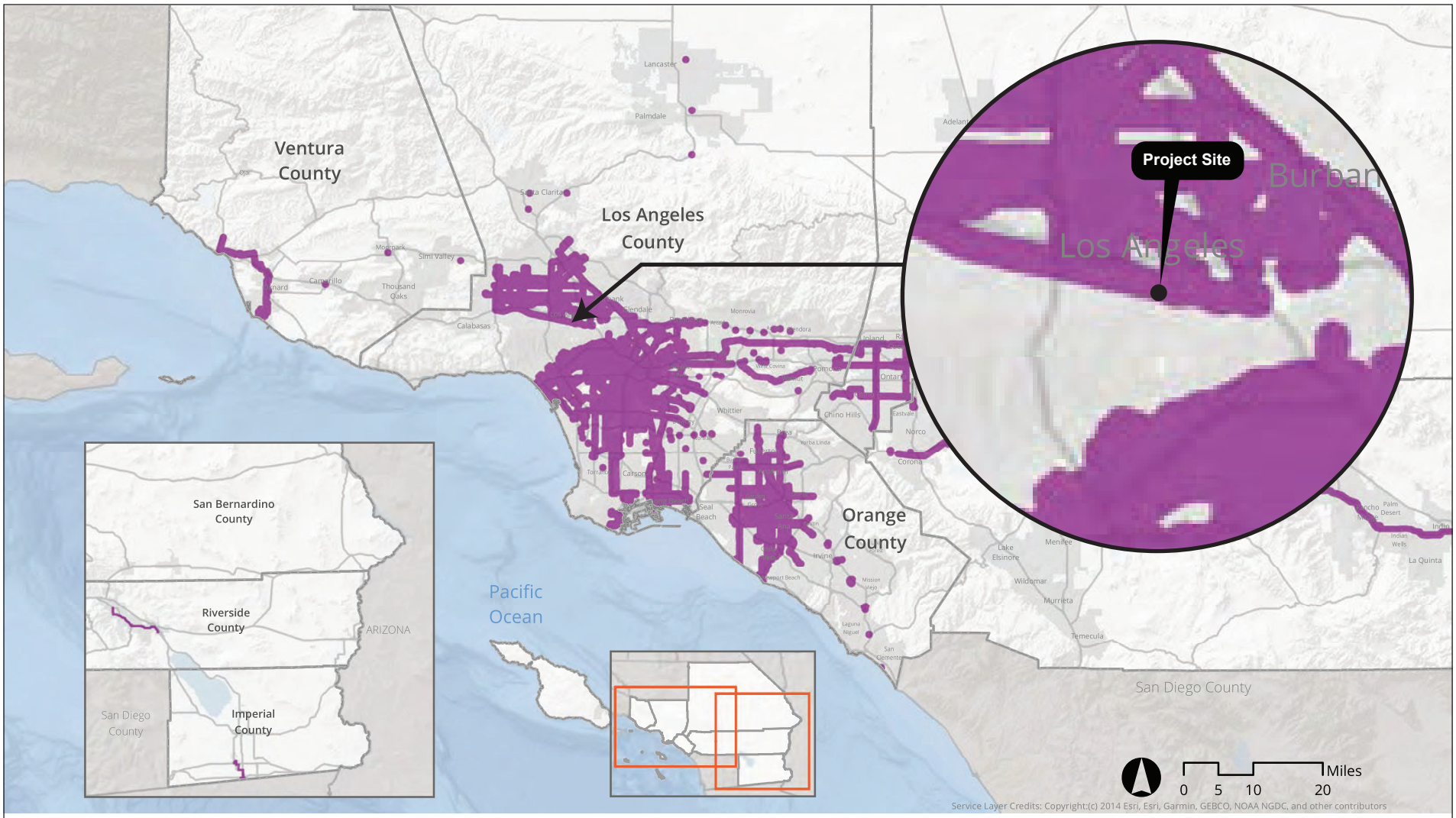
TPA

Note: Transit priority area (TPA) refers to an area within one-half mile of a major transit stop that is existing or planned. SCAG identifies major transit stops and transit priority areas using the methodology described in the Transit Technical Report. Major transit stops are extracted from 2045 plan year data of Connect SoCal.

Figure 10

Priority Growth Area - Transit Priority Areas

Source: County Transportation Commissions, SCAG, 2019.



High Quality Transit Areas (2045)

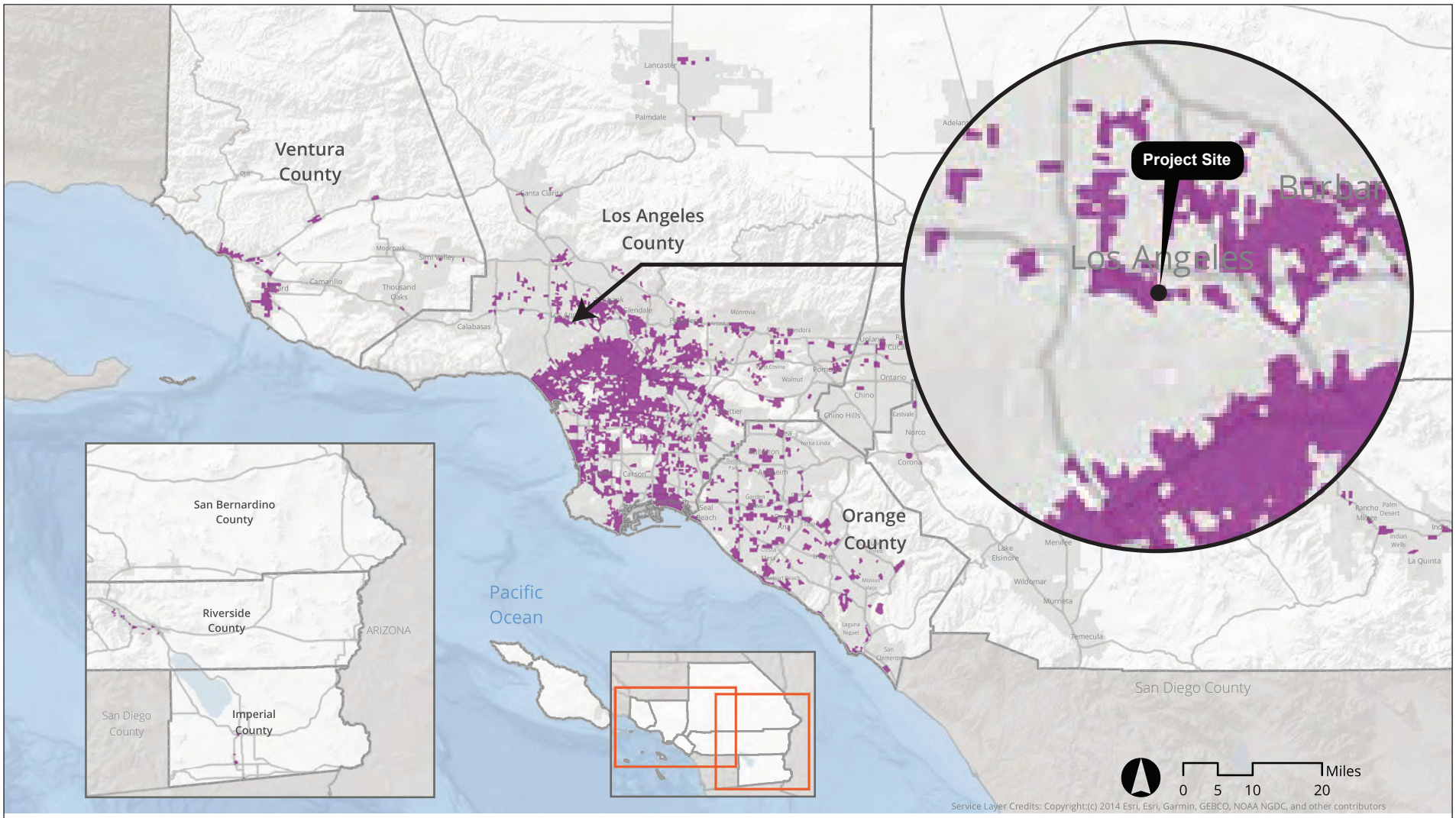
HQTA

Note: SCAG's High Quality Transit Area (HQTA) is within one-half mile from major transit stops and high quality transit corridors (HQTC). SCAG identifies major transit stops and HQTCs using the methodology described in the Transit Technical Report. Major transit stops and HQTCs are extracted from 2045 plan year data of Connect SoCal.

Figure 11

Priority Growth Area - High Quality Transit Areas

Source: County Transportation Commissions, SCAG, 2019.



Neighborhood Mobility Areas (NMA)

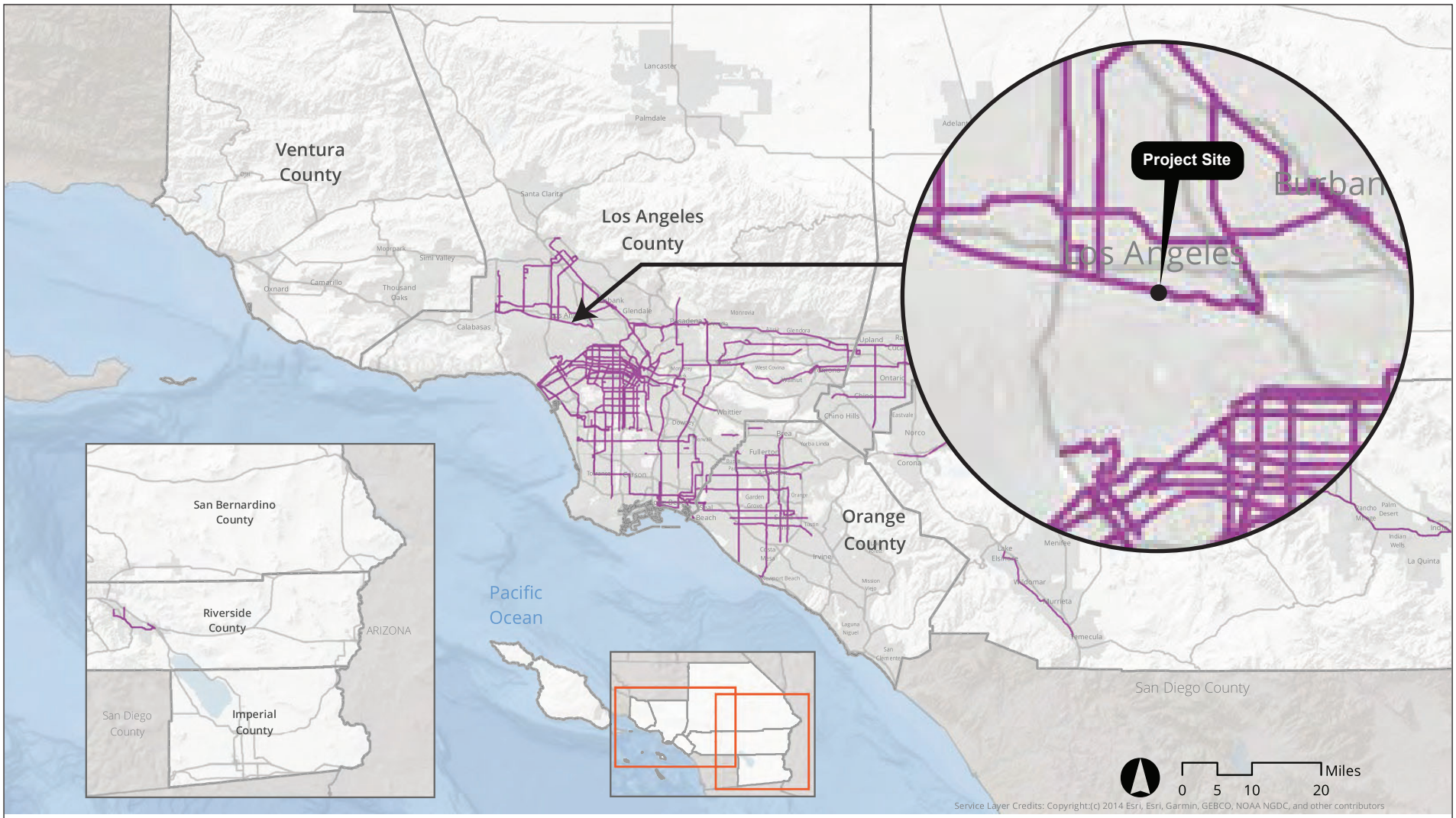
NMA

Note: Neighborhood Mobility Areas (NMA) were identified by analyzing and assigning z-scores four measures at the Tier 2 TAZ level, and subsequently summing the z-scores. TAZs that scored at the 80th percentile or higher for the composite score were considered NMAs.

Figure 12

Priority Growth Area - Neighborhood Mobility Areas

Source: SCAG, 2019.



Livable Corridors

Livable Corridors

Figure 13

Priority Growth Area - Livable Corridors

Source: SCAG, 2019.

The Project's location, scale, and mixture of land uses would be consistent with its designation within these three PGAs, which, in turn, indicates consistency with the use designations, density, and buildings intensity of the SCS. Specifically, the Project Site is located in an urbanized area within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area of the City of Los Angeles. The Project would respond to and complement the existing development pattern in the area, which is characterized by a mix of low-to mid-rise buildings containing commercial, residential, and office uses, with open space uses located along the Los Angeles River to the north and further east of the Project Site. The Project is a mixed-use development that would include 520 residential units (including 78 deed restricted Very Low-Income units), 23,475 square feet of retail uses, and 13,568 square feet of restaurant uses on a site that is well-served by transit. As noted above, the Project is approximately 83 percent residential, with the housing consisting entirely of multi-family dwelling units. The Project would contain a total of 650,966 square feet with a total proposed floor area ratio (FAR) of 2.84:1 and an overall net residential density of 89.6 units per acre. The Project would significantly increase the housing supply in the Project area, as well as housing diversity and affordability in the PGAs in which the Project Site is located. Of the Project's 520 residential dwelling units, 78 would be reserved for Very Low-Income affordable units deed restricted for a 55 year period. In addition, the 520 residential units would include 171 studios, 140 one-bedroom units, and 209 two-bedroom units in varying sizes and configurations and offered at varying rental prices, thereby providing housing diversity. The Project Site is located near several bus lines, including Metro Bus Line 240, which provides average headways of 12 minutes in the morning and evening peak commute times. Thus, the mixed-use nature of the Project in an urban area near transit would provide opportunities for Project residents, visitors, and employees to have safer and shorter multimodal trips, thereby reducing dependency on automobile travel and single occupancy trips and thus, reducing GHG emissions.

The Project Site would include a series of publicly accessible landscaped pedestrian pathways and courtyards that would connect the areas within the Project Site and provide pedestrian access from the three public frontages (i.e., Ventura Boulevard, Coldwater Canyon Avenue, and the Los Angele River), thereby enhancing destination accessibility. Specifically, a landscaped entry plaza would be provided along Ventura Boulevard that would connect to an open-air retail plaza. A variety of ground-floor retail and restaurant options would be located around this plaza that would serve the residents and visitors of the Project Site. Pedestrians could also access the Project Site from Coldwater Canyon Avenue, and via a terraced plaza that would connect the Project Site and the Los Angeles River Path. Each of these spaces would create vibrant areas for gathering, dining, or strolling. In addition, the Project would include 264 bicycle parking spaces, including 224 long-term spaces and 40 short-term spaces, with an additional 49 long-term spaces proposed to be relocated to the Project Site from The Shops Development. Pedestrian-scaled design and pedestrian and bicycle amenities would encourage the use of alternative modes of travel, thereby further reducing reliance on automobile travel and resulting GHG emissions.

Overall, the nature of the Project, including the location, mix of uses, density, and building intensity, would be consistent with SCAG's land use strategies related to reducing dependence on automobile travel and thus, mobile-source GHG emissions, by encouraging development within PGAs. Furthermore, the Project would be consistent with the intent of the specific PGAs in which it is located (i.e., HQTA, NMA, and Livable Corridor). As such, the Project would be consistent with the 2020–2045 RTP/SCS's goals, policies and benefits for land use, density, and intensity of development.

4.2.2 Sustainable Communities Strategy Policy Consistency

Chapter 3 of the 2020–2045 RTP/SCS outlines strategies and measures included in the SCS Technical Report that are intended to be supportive of implementing the regional SCS. Several are directly tied to supporting related GHG reductions while others support the broader goals of the 2020–2045 RTP/SCS. As outlined below in Table 2 on page 38, the Project would be consistent with applicable measures of the SCS. A discussion of the Project's consistency with the applicable goals, as well as a more general discussion of the Project's consistency with the applicable strategies, of the 2020–2045 RTP/SCS is included in Table 12 on page 199 in Part 5, Evaluation of Environmental Impacts, of this SCEA.

Table 2
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
Strategy: Focus Growth Near Destinations and Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	**Consistent**. The Project would consist of a mixed-use development that would include market rate and affordable residential units and retail/restaurant uses within a PGA. Consistent with the Project Site's location in an HQTA and NMA and along a Livable Corridor, residents and employees of the Project would have multimodal access (e.g., transit, walking, and bicycling) to and from their jobs, school, and other destinations
Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	**Consistent.** The Project would contribute to a balance between jobs and housing in the region by providing 520 new residential dwelling units within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area of the City of Los Angeles. The Project Site is located in an urban area near commercial and job centers. Furthermore, the Project Site is located on Ventura Boulevard, which is a primary east-west thoroughfare with access to several transit options as well as to US-101.
Plan for growth near transit investments and support implementation of first/last mile strategies	**Consistent.** The Project Site is served by a variety of public transit options, including Metro Bus Lines 240 and 167 located along Ventura Boulevard; the Downtown Area Shuttle (DASH) Van Nuys/Studio City Line, located approximately 0.4 mile north of the Project Site; and the Universal City/ Studio City station of the Metro B Line, located approximately 2.86 miles southeast of the Project Site. Metro Bus Line 240 is identified as a part of Metro's NextGen Bus Plan as a bus line that would be improved with increased frequency and service operation. Thus, the Project would provide for growth near transit investment. First/last mile strategies are designed to increase transit usage by making it more convenient and safe to walk or bicycle to and from transit stations. The Project would implement a variety of first/last mile strategies, including the provision of 264 bicycle parking spaces (224 long-term spaces and 40 short-term spaces) and pedestrian network improvements internal to the Project Site. In addition, the Project would improve the pedestrian environment around the perimeter of the Project Site by providing new landscaping and crosswalks, as well as safety improvements associated with the removal of one driveway and the realignment of the two remaining driveways, which would reduce the total vehicle and pedestrian conflict points and provide safe access for pedestrians.
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	**Consistent.** While this measure is directed toward public agencies, the Project would support its implementation. The Project would replace hotel uses with a mixed-use development consisting of 520 residential units, 23,475 square feet of retail uses, and 13,568 square feet of restaurant uses. The Project would be designed to complement adjacent commercial uses and enhance the

Table 2 (Continued)
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
	surrounding area, creating an inviting atmosphere and utilizing its location adjacent to the Los Angeles River as an asset to be enjoyed by residents and visitors to the site.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	**Consistent**. The Project would replace existing hotel uses with a mixed-use development that would provide amenities and connectivity on a site that has been historically closed off from the surrounding area. The Project would include a series of publicly accessible landscaped pedestrian pathways and courtyards that would connect the areas within the Project Site and provide pedestrian access to each of the Project Site's public frontages. Specifically, the Project would include a landscaped entry plaza along Ventura Boulevard that would connect to a public open-air retail plaza. In addition, the Project would provide a new public connection to the Los Angeles River Path via a landscaped and terraced open space area. The Project would also include a publicly-accessible outdoor plaza with access to the River. Gathering and seating areas would be located throughout the Project Site for use by residents and visitors. In addition, private amenities would be available to residents of the Project, including an amenity/pool deck on the roof of Structure 1 and an amenity deck overlooking the Los Angeles River on the roof of Structure 2. Thus, the Project would represent infill development that would accommodate growth, increase amenities, and enhance connectivity to existing neighborhoods.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	**Consistent.** The Project has been designed to incorporate a variety of strategies that would reduce the reliance on, and number of, solo car trips. The Project would include a mix of uses, including 520 residential units and 37,043 square feet of retail and restaurant uses that would be located in an area that is well-served by transit and that has been identified by a PGA. The Project would be designed at a pedestrian scale and would incorporate amenities and improvements, including seating areas, landscaping, crosswalks, and safety improvements at the Project driveways, that would contribute to the walkability of the area. In addition, the Project would provide 264 bicycle parking spaces (224 long-term spaces and 40 short-term spaces), as well as 49 additional long-term spaces that currently service The Shops Development that are proposed to be relocated to the Project Site. Furthermore, pursuant to Mitigation Measure TR-MM-1 as outlined under Item XVII, Transportation, in Part 5 of this SCEA, the Project would include a reduced parking supply, unbundled parking (with a minimum $100 surcharge), and a voluntary travel behavior change program to encourage the use of alternative transportation modes consistent with the requirements set for the in LAMC Section 12.26J (the TDM Ordinance).
Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g.,	**Consistent.** As previously discussed, the Project would include a reduced parking supply and unbundled parking to

Table 2 (Continued)
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
shared parking, smart parking)	encourage the use of alternative modes of transportation.
Strategy: Promote Diverse Housing Choices	
Preserve and rehabilitate affordable housing and prevent displacement.	**Consistent.** The Project Site is currently developed with hotel uses. Thus, the Project would not displace any housing. Rather, the Project would develop 520 new residential units, which would include 78 units set aside for Very Low-Income Households.
Identify funding opportunities for new workforce and affordable housing development.	**Consistent.** While this measure is directed toward public agencies, the Project would support its implementation by including 78 Very-Low Income units deed restricted for a 55 year period, which would be funded by the Applicant. In addition, the Project would include 37,043 square feet of commercial uses (restaurant and retail) that would generate approximately 128 new employees.
Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply	**Not Applicable.** This measure is directed toward public agencies. However, the Project would increase the housing supply by providing 520 new multi-family residential units.
Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	**Consistent**. This measure is directed toward public agencies and does not apply to an individual projects. However, the Project would support the reduction of greenhouse gas (GHG) emissions by concentrating new residential development on an infill site with access to transit. In addition, the provision of pedestrian features and bicycle amenities would further expand multimodal transportation options, thereby reducing VMT and resulting GHG emissions. Additional sustainability features that would reduce GHG emissions would be incorporated into the Project, including but not limited to, parking spaces with electric vehicle charging equipment, lighting that meets current Title 24 Energy Standards, photovoltaic system ready, highly efficient HVAC systems, energy-efficient wall insulation and glazing units, WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems, and Energy Star–labeled appliances. Additionally, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials where applicable.
Strategy: Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space	**Consistent.** The Project would utilize low-emission technologies, including dedicated parking spaces with electric vehicle charging equipment consistent with CalGreen and LA Green Building Code requirements, and the use of Tier 4 construction equipment. In addition, the Project would include a passenger loading area along Ventura Boulevard adjacent to the southern boundary of the Project Site, which would provide a dedicated space for pick-up and drop-offs while maintaining the existing street right-of-way. The Project would also provide a total of 313 bicycle parking spaces (including 49 relocated spaces) that could be used for bike

Table 2 (Continued)
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
	sharing.
Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments	**Not Applicable.** This measure is directed toward public agencies as a policy strategy and does not apply to individual projects.
Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Not Applicable.** This measure is directed toward public agencies as a policy strategy and does not apply to individual projects.
Strategy: Support Implementation of Sustainability Policies	
Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions	**Consistent.** While this measure is directed toward public agencies, the Project would support its implementation. The Project would include a variety of sustainability measures that would reduce GHG emissions, as outlined above in and Part 3, Project Description, of this SCEA.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations	**Consistent**. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects. However, the Project would support its implementation. The Project would be located within an HQTA and NMA and along a Livable Corridor. Specifically, Metro Bus Lines 240 and 167 are located along Ventura Boulevard adjacent to the Project Site, DASH Van Nuys/Studio City Line is located approximately 0.4 mile north of the Project Site, and the Universal City/Studio City station of the Metro B Line is located approximately 2.86 miles southeast of the Project Site.
Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space	**Not Applicable**. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Work with local jurisdictions/ communities to identify opportunities and assess barriers to implement sustainability strategies	**Not Applicable**. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region	**Not Applicable**. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Continue to support long range planning efforts by local jurisdictions	**Not Applicable**. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Not Applicable**. This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.

Table 2 (Continued)
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
Strategy: Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**Not Applicable.** This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration	**Consistent**. While his measure is directed toward SCAG and/or local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. With regard to on-site renewable energy sources, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. With regard to urban heat islands, at build-out, the Project Site would consist of approximately 25 percent pervious surfaces, which is an approximately 15 percent increase as compared to existing conditions. Furthermore, the Project would include extensive landscaping, thereby reducing the potential for urban heat islands.
Integrate local food production into the regional landscape	**Not Applicable.** This measure is directed toward SCAG as a policy strategy and does not apply to individual projects. Furthermore, the Project area is an urbanized area and the Project Site is not zoned, or suitable for, agricultural uses
Promote more resource efficient development focused on conservation, recycling and reclamation.	**Consistent.** The Project is an infill development located in an urbanized area that is served by existing infrastructure. Thus, the Project would not result in the loss of previously undeveloped land or land intended for conservation. Furthermore, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. In addition, in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), the Project would provide a designated recycling area for Project residents and visitors. Thus, the Project would promote resource efficient development.
Preserve, enhance, and restore regional wildlife connectivity.	**Not Applicable.** This measure is directed toward public agencies. Furthermore, the Project Site does not serve as a regional wildlife connector, and, as discussed under Item IV, Biological Resources, in Part 5, Evaluation of Environmental Impacts, of this SCEA, the Project would not interfere with wildlife corridors.
Reduce consumption of resource areas, including agricultural land.	**Consistent.** The Project would be developed on a site that has been previously developed with hotel uses and is zoned C1.5-1VL-RIO (Limited Commercial, Height District 1VL, River Improvement Overlay), with the northeast portion of the Project Site zoned R4P-1VL-RIO (Multiple Dwelling or Parking, Height District 1VL, River Improvement Overly). No resource areas or agricultural lands would be impacted by the Project.

Table 2 (Continued)
Consistency with 2020–2045 RTP/SCS Strategies/Measures

Strategy/Measure	Consistency Assessment
Identify ways to improve access to public park space.	**Consistent.** The Project would incorporate the Los Angeles River as a focal point and would incorporate enhancements that would improve the public interface with the River and increase access to the Los Angeles River Path. Specifically, the Project would incorporate a landscaped and terraced open space area that would directly connect the Project Site and the Los Angeles River. A pedestrian pathway would also provide direct access to the Los Angeles River Path from Coldwater Canyon Avenue.

Source: SCAG, 2020–2045 *RTP/SCS, September 2020; Eyestone Environmental, 2021.*

5 ENVIRONMENTAL IMPACT ANALYSIS

5.1 Scope of Analysis

This section of the Sustainable Communities Environmental Assessment (SCEA) contains an assessment and discussion of impacts associated with issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines [C.C.R. Title 14, Chapter 3, 15000-15387]). Pursuant to PRC Section 21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the Project, other than those that do not need to be reviewed pursuant to PRC Section 21159.28 based on substantial evidence in light of the whole record.

All incorporated mitigation measures, performance standards, or criteria set forth in prior applicable Environmental Impact Reports (EIRs) and adopted in findings made pursuant to PRC Section 21081 shall constitute the baseline for this analysis. Thus, in accordance with PRC Section 21155.2, the evaluation of impacts included in this SCEA includes those that remain after the incorporation of the mitigation measures from prior applicable EIRs. A Program Environmental Impact Report (PEIR) was prepared to evaluate the potential environmental impacts of Southern California Association of Government's (SCAG's) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).[16] As part of that PEIR, mitigation measures were included that would reduce potentially significant impacts identified in the PEIR. The complete list of the mitigation measures identified in the PEIR is included in Exhibit A, Revised Mitigation Monitoring and Reporting Program (MMRP), of the Final PEIR. The mitigation measures in the PEIR are divided into two categories: SCAG mitigation measures (referred to in the MMRP as SMM) and project-level mitigation measures (referred to in the MMRP as PMM). SCAG mitigation measures are intended to be implemented by SCAG over the lifetime of the RTP/SCS. Project-level mitigation measures are intended for projects proposing to streamline the environmental review process pursuant to SB 375, SB 743, or SB 226, such as the proposed Project. Project-level mitigation measures outlined in the PEIR should be considered and implemented by a Lead Agency and Project Applicant during project-specific environmental reviews, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. However, since SCAG has no authority to impose mitigation measures, a lead agency must use its independent discretion to determine whether mitigation measures are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use measures identified in this PEIR as appropriate to address project-specific conditions. In compliance with PRC Section 21151.2, the City has reviewed all of the mitigation measures in the 2020–2045 RTP/SCS PEIR MMRP and determined their potential applicability to the Project. This applicability analysis is included in the analysis below for each environmental issue identified under Appendix G of the of the State CEQA Guidelines. For each mitigation measure, the City determined whether to use: (1) the MMRP's mitigation measure; (2) an equally effective City mitigation measure (consistent with the MMRP mitigation measures); (3) federal, state, regional, or City regulation; or (4) no mitigation, as there was no potential for a significant environmental effect. Where applicable, any new project design features and/or mitigation measures shall be identified in this section to help reduce or avoid all potentially significant impacts on the environment.

[16] SCAG, Certified Final PEIR for the 2020-2045 RTP/SCS, May 2020, https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618, accessed April 25, 2022.

The SCEA is also required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs. Where it has been determined that a cumulative effect has been adequately addressed and mitigated, the cumulative effect shall not be treated as cumulatively considerable. CEQA defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." The analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to "be guided by the standards of practicality and reasonableness."

The analysis of cumulative impacts provided herein is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects. The list of related projects is based on information provided by the City of Los Angeles Department of Transportation (LADOT) and the City of Los Angeles Department of City Planning, and also includes other projects in the area based on recent studies. The list of five related projects within 0.75 mile of the Project Site (which is within a 0.25-mile radius of the farthest outlying intersection, as suggested by LADOT's Transportation Assessment Guidelines) is provided in Table 35 on page 329 and shown in Figure 16 on page 330 found under Item XXI, Mandatory Findings of Significance. Although these projects serve as context for the development environment in the Project vicinity, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. The cumulative analyses for each environmental issue are provided below following the assessment of Project impacts.

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Appendix G of the State CEQA Guidelines does not address impacts related to shading. Thus, the shade threshold included in the *2006 L.A. CEQA Thresholds Guide* is used to address potential impacts related

to shading. According to the *L.A. CEQA Thresholds Guide*, a proposed project would have a significant shading impact if:

- Shadow sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM AES-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.

b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.

c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.

d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.

e) Retain or replace trees bordering highways, so that clear-cutting is not evident.

f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.

g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity;

h) Use see-through safety barrier designs (e.g. railings rather than walls).

Applicability to the Project

As analyzed below, the Project would not have a substantial adverse effect on a scenic vista and, therefore, PMM AES-1 is not applicable to the Project.

PMM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important

viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.

b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.

c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.

d) Design projects consistent with design guidelines of applicable general plans.

e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.

f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:

  – use transparent panels to preserve views where sound walls would block views from residences;

  – use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height;

  – construct sound walls of materials whose color and texture complements the surrounding landscape and development;

g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas

Applicability to the Project

The Project is located within an urbanized area and, thus, pursuant to Aesthetics Threshold (c), the analysis included herein is focused on whether the Project would conflict with applicable zoning and other regulations governing scenic quality rather than on visual character. Thus, as Mitigation Measure PMM AES-2 addresses visual character, it is not applicable to the Project.

PMM AES-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Use lighting fixtures that are adequately shielded to a point below the light build and reflector and that prevent unnecessary glare onto adjacent properties.

b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances.

c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.

d) Use unidirectional lighting to avoid light trespass onto adjacent properties.

e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light sensitive uses. Ongoing over the life of the plan Lead Agency Revised MMRP for the Connect SoCal Plan, Exhibit A Resolution No. 20-624-1 Impact Sciences, Inc. 4 Revised MMRP for the Connect SoCal Plan, Exhibit A 1329.001 September 2020 Mitigation Measure Mitigation Monitoring Timing Responsible Monitoring Entity

f) Provide structural and/or vegetative screening from light-sensitive uses.

g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.

h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.

i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.

Applicability to the Project

As analyzed below, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Compliance with regulatory requirements would further ensure that impacts associated with light and glare would be less than significant. As such, Mitigation Measure PMM AES-3 is not applicable to the Project.

Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista is a panoramic view of a valued visual resource. Within the vicinity of the Project Site, the Los Angeles River (River), adjacent to the north of the Project Site, and the Hollywood Hills, the base of which are located approximately 0.5 mile south of the Project Site, would be considered valued visual resources. However, panoramic views of the Hollywood Hills are limited due to the intervening developments that block long-range views. In addition, the portion of the Los Angeles River that runs adjacent to the Project Site is located below grade and thus, views of are limited to locations directly adjacent to the River. Thus, overall, views of the available visual resources in the vicinity of the Project Site are currently limited, partial, distant, and/or non-existent.

The Project Site is located in an urbanized area developed with a mix of low- to mid-rise commercial, residential, office, and open space uses. The Project would replace the existing buildings on the Project Site with new residential, restaurant, and retail uses totaling 650,966 square feet, including 520 residential units, 18,019 square feet of restaurant uses, 27,926 square feet of retail uses, and 64,151 square feet of residential amenity space. The proposed uses would be located within three low- to mid-rise buildings ranging in height from 37 feet to 94 feet, as measured to the highest point of the buildings, including parapets (per LAMC Section 12.03). The Project would have a maximum floor area ratio (FAR) of 2.84:1. Development of the Project Site with these structures would not obscure any existing views of the Hollywood Hills or the Los Angeles River, as views of these resources are currently not available through the Project Site. Such views, if available, are limited and intermittent and are mostly confined to north-

south roadway segments (e.g., Coldwater Canyon Avenue). In addition, the Project would incorporate the Los Angeles River as a focal point and would include open space and access enhancements that would serve to increase both visual and physical access to the River, thereby increasing publicly-available views of the River. ***Thus, due to the urbanized nature of the area and the lack of access to scenic vistas, the Project would not block or obstruct views of visual resources. Therefore, development of the Project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.***

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible (not yet designated) state scenic highway is along California State Route 210 (SR-210), specifically starting at Interstate 5 (I-5) near Tunnel Station and extending to Route 134 near Pasadena, which is located approximately 9 miles northeast of the Project Site.[17] ***Therefore, as the Project site is not located along a state scenic highway, the Project would not substantially damage scenic resources within a state scenic highway, and no impacts would occur.***

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project Site is located within an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. Local land use regulations applicable to the Project Site that include policies that address scenic quality include the Los Angeles Municipal Code (LAMC), the City of Los Angeles General Plan Framework Element (Framework Element) and Conservation Element, the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan (Community Plan), the Ventura-Cahuenga Boulevard Corridor Specific Plan (Specific Plan), and Citywide Design Guidelines, and Title 24 of the California Code of Regulations. These plans, policies, and regulations are discussed in more detail below.

Los Angeles Municipal Code/Ventura–Cahuenga Boulevard Corridor Specific Plan

Chapter 1 of the LAMC, referred to as the City of Los Angeles Planning and Zoning Code, sets forth regulations and standards regarding the allowable type, density, height, and design of new development projects. The Project Site is zoned C1.5-1VL-RIO (Limited Commercial, Height District 1VL, River Improvement Overlay), with the northeast portion of the Project Site adjacent to the Los Angeles River zoned R4P-1VL-RIO (Multiple Dwelling or Parking, Height District 1VL, River Improvement Overlay). Pursuant to the LAMC, the C1.5 Zone permits limited commercial uses, including C1 (limited commercial) uses, retail, theaters, hotels, broadcasting studios, parking buildings, parks and playgrounds, and R4 (residential multiple dwelling) uses. The Height District 1VL designation for the C1.5 Zone permits an FAR of 1.5:1 and a height limit of 45 feet. The R4P Zone permits residential multiple dwelling or parking

[17] Caltrans, Scenic Highways, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983, accessed March 12, 2021.

uses, including R3 uses (multiple dwelling), churches, schools, childcare, and homeless shelter uses. The Height District 1VL designation for the R4P Zone permits an FAR of 3:1 and a height limit of 45 feet. The Project Site is located within a River Improvement Overly District, which includes additional development regulations regarding landscaping, screening/fencing, and lighting.

The Project Site is also located within the Ventura–Cahuenga Boulevard Corridor Specific Plan area, which includes development standards that are in addition to the LAMC. Whenever the Specific Plan contains provisions which require different setbacks, restricted yards, lower densities, lower heights, restricted uses, greater parking requirements or other greater restrictions or limitations on development than would be allowed in the LAMC, the Specific Plan shall supersede the applicable provisions of the LAMC. Among other development standards, the applicable regulations to the Neighborhood and General Commercial Plan Designation of the Specific Plan permit 30 feet in height and up to 45 feet in height for buildings designed with setbacks, a maximum 1.0:1 FAR, and a maximum 60 percent lot coverage. As previously discussed, the Los Angeles Department of City Planning is currently preparing an amendment to the Specific Plan, which would modernize regulations and improve efficiencies within the project review process, as well as expand the use of transportation funds and address internal Specific Plan inconsistencies. The Project is currently in the initial CEQA compliance phase. Thus, for purposes of this SCEA, the analysis is limited to the designations and policies under the currently adopted Ventura-Cahuenga Boulevard Corridor Specific Plan.

The Project would replace the existing buildings on the Project Site with new residential, restaurant, and retail uses totaling 650,966 square feet, including 520 residential units (including 78 Very Low-Income units, which is 15 percent of the total Project units), 18,019 square feet of restaurant uses, 27,926 square feet of retail uses, and 64,151 square feet of residential amenity space. The proposed uses would be located within three low- to mid-rise buildings ranging in height from two to seven stories with parking provided in three subterranean levels. As permitted by State Density Bonus Law and the City's implementing ordinance (codified in LAMC Section 12.22.A.25), the Applicant is requesting approval of Density Bonus incentives/waivers. With the requested relief, the Project would include a maximum height of 94 feet; a maximum FAR of 2.84:1; a reduction in the number of LAMC required standard accessible parking stalls; reduced zero-foot rear yard setbacks for Parking Level P1; reduced zero-foot side yard setbacks on Parking Level P1; and a waiver of the transitional height limits set forth in LAMC Section 12.21.1.A.10 due to the Project Site's proximity to an open space zone (i.e., Los Angeles River), and relief from the LAMC passageway requirements.

The Project would be consistent with LAMC requirements regarding lighting and signage. The Project would include pedestrian-scale exterior lighting fixtures along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Parking uses would be located within subterranean levels, thereby eliminating the any reflection from parking areas on to streets and adjacent premises. Project lighting would be designed to minimize light spill-over from the Project Site, reduce sky-glow, and improve nighttime visibility through glare reduction. All exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto neighboring properties, and all new street and pedestrian lighting within the public right-of-way would comply with applicable City and LAMC regulations. Furthermore, the Project would comply with the regulations regarding exterior site lighting applicable to properties in the River Improvement Overlay District, which require that all lighting produce a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the Project Site

boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the Project Site. In addition, RIO District lighting regulations require that no more than five percent of the total initial designed lumens shall be emitted at an angle of 90 degrees or higher from nadir. In addition, Project signage would be designed to be aesthetically compatible with the proposed architectures of the Project and consistent with the requirements of the LAMC.

The Project would also comply with other relevant aesthetics-related regulations set forth for properties located within the RIO District, which requires that properties establish a positive interface between River-adjacent properties and River parks and/or greenways (Purpose No. 3); provide an aesthetically pleasing environment for pedestrians and bicyclists accessing the River area (Purpose No. 6); and promote the River identity of River-adjacent communities (Purpose No. 8). Specific measures that would be implemented in support of the RIO district policies include the screening of mechanical equipment and trash enclosures, the use of appropriate landscaping, and lighting that would comply with applicable RIO requirements. The Project would enhance the River identity by treating the River as a focal point, creating an open and attractive interface between the Project Site and the River. The Project would include landscaped and terraced open space that would directly connect the Project Site and Coldwater Canyon Avenue to the Los Angeles River. In addition, building frontages along the River would be designed with the same design concepts and detail as along the primary frontage, and would include residential balconies and landscaping that would complement the River setting and the existing residential neighborhood. As such, the Project would create an open and aesthetically pleasing environment for pedestrians and bicyclists accessing the River area, establishing a positive interface and promoting the River identity.

General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) provides direction regarding the City's vision for future development in the City. Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies general neighborhood design policies and implementation programs that guide local planning efforts. Specifically with regard to aesthetics, the Framework Element includes goals, policies, and objectives regarding the scale and character of neighborhoods (Policy 3.2.4 and Objective 4.3), the quality of development and public realm (Chapter 5), and topics related to lighting (Chapter 9). The Project's consistency with each of the relevant goals, policies, and objectives is also outlined in Table 3 on page 52.

As described in Section 3, Project Description, of this SCEA, the Project Site is currently developed with a five-story hotel and associated facilities totaling approximately 135,584 square feet and approximately 587 surface parking spaces surrounding the hotel on the south, east, and north. The existing uses are set back from Ventura Boulevard and are generally visually separated from the surrounding area. The area surrounding the Project Site includes a mix of low- to mid-rise commercial, residential, office, and open space uses. The Project would enhance the built environment in the surrounding area and upgrade the quality of development by replacing the existing uses with a mix of uses that would incorporate design elements that would enhance the quality of the visual environment while providing visual and functional connections to the surrounding neighborhood and the Los Angeles River. Specifically, the Project would provide pedestrian access from three public frontages: Ventura Boulevard, Coldwater Canyon Avenue, and the Los Angeles River frontage. A landscaped pedestrian entry plaza would be located along Ventura Boulevard, providing access to an open-air retail plaza. In addition, a publicly accessible outdoor plaza would be located between Building 2 and Building 3, as identified in Figure 6 on page 20 in

Table 3
Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
General Plan Framework Element Land Use Chapter (Chapter 3)	
Policy 3.7.4: Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.	**No Conflict.** The Project would include 520 residential units, including 78 Very Low-Income affordable units (i.e., 15 percent of the total Project units), which would be part of a mixed-use development consisting of residential, retail, and restaurant uses, which would replace the existing hotel and associated uses on the Project Site. The proposed uses would be located within three low- to mid-rise buildings that would be designed to unify and enhance the overall aesthetic environment of the Project Site and surrounding area. Furthermore, various open space areas, pedestrian pathways, and landscape features would also serve to improve the overall visual quality of the Project Site. Enhancements to the area fronting the Los Angeles River would further contribute to the quality of the visual environment. As provided below, the Project would be consistent with applicable standards in the Urban Form and Neighborhood Design Chapter of the General Plan Framework Element as well as the Urban Design Chapter of the Community Plan. As such, the Project would not conflict with this policy.
General Plan Framework Element Housing Chapter (Chapter 4)	
Objective 4.3: Conserve scale and character of residential neighborhoods.	**No Conflict.** The Project Site vicinity includes a mix of low- to mid-rise commercial, residential, office, and open space uses. The Project Site is located along Ventura Boulevard, which is characterized by commercial uses and surface parking areas. The nearest residential neighborhood to the Project Site is located north of the Los Angeles River, with additional residential uses located south of the commercial uses along Ventura Boulevard. While the Project would result in an increase in the building density and maximum height on the Project Site, the height and bulk of the Project would remain consistent in scale with the surrounding uses. The Project would be designed to complement the surrounding uses and respond to the low- to mid-scale character of the surrounding area. Specifically, the massing of the proposed buildings would be articulated to provide a wide range of configurations. The buildings would vary in height, with the tallest component located in the center of the Project Site and the building heights stepped back along Ventura Boulevard and along the Los Angeles River frontage. In addition, the top floor of each building would be further stepped back from the floors below to lower the perceived height of the buildings. Extensive landscaping and pedestrian-scaled amenities would further serve to maintain the scale and character of the area. In addition, the Project's frontage along the Los Angeles River, adjacent to the residential neighborhood, would be upgraded, with the River acting as a focal point to the Project. To that end, the buildings' frontage along the River would be designed with the same design concepts and detail as along the primary frontage, and would include residential balconies and

Table 3 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
	landscaping that would complement the River setting and the existing residential neighborhood. In addition, the Project would include landscaped and terraced open space that would directly connect the Project Site to the Los Angeles River. As such, the Project would create an appealing and unified site that would respond to, and complement, the scale and character of the surrounding neighborhoods. Thus, the Project would not conflict with this policy.
General Plan Framework Element Urban Form and Neighborhood Design Chapter (Chapter 5)	
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**No Conflict.** As described above, the Project would replace the existing hotel and surface parking area with a mixed-use development that would provide a total of 520 residential units, including up to 78 Very Low-Income affordable units (i.e., 15 percent of the total units). The Project would also provide 18,019 square feet of restaurant uses, 27,926 square feet of retail uses, and 64,151 square feet of residential amenity space. Additionally, the Project would provide 79,366 square feet of open space, including 66,816 square feet of common open space consisting of 52,520 square feet of exterior common open space, 14,296 square feet of interior common space; and 12,550 square feet of private open space. Approximately 21,039 square feet would be publicly accessible, and would include the open-air retail plaza and the open space areas connecting the Project Site to the Los Angeles River. Private open space amenities that would be available to residents of the Project Site would include a pool deck on the roof level of Building 1 and an amenity deck overlooking the River on the roof level of Building 2. The uses and amenities that would be provided by the Project would serve to enhance the livability of the neighborhood. In addition, the design elements that would be incorporated into the Project would further serve to enhance the livability of the neighborhood. The Project would be designed to complement the surrounding uses and respond to the low- to mid-scale character of the surrounding area. In addition, the proposed open space and landscaping features, including various enhancements to the area along the Los Angeles River, would improve the quality of the public realm. Therefore, the Project would not conflict with this objective.
Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	**No Conflict.** Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage. New signage would be architecturally integrated into the design of the buildings and would be designed to be aesthetically compatible with the architecture of the Project and the surrounding area. In addition, proposed signage would comply with the requirements of the LAMC. Thus, the Project would not conflict with this policy.

Table 3 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
General Plan Framework Element Infrastructure and Public Services Chapter (Chapter 9)	
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	**No Conflict.** The Project would provide appropriate lighting for nighttime vision, visibility, and safety needs throughout the Project Site. This would include lighting provided along walkways and in outdoor gathering areas on the ground level and on the outdoor decks and low-level security, wayfinding, and landscape and architectural lighting throughout the Project Site. Sufficient lighting would also be provided in the subterranean parking levels to maximize visibility and reduce areas of concealment. Night lighting would be low profile and at the necessary intensity to provide a safe environment. Architectural and informational lighting would include low-level accent lighting on the proposed buildings to highlight architectural features and signage. All exterior lighting would be shielded or directed toward the areas to be illuminated to limit light spillover onto off-site uses and would meet all applicable LAMC lighting standards, including those pertaining to projects within the RIO District. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be subject to the approval of the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties. As such, the Project would not conflict with this goal.
Objective 9.40: Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.	**No Conflict.** Proposed lighting would be implemented in accordance with the lighting standards set forth in the California Building Code and the California Energy Code, which establish light intensities for various land uses. Furthermore, as discussed above under Goal 9P, the Project would minimize light pollution, light trespass, and glare. Thus, the Project would not conflict with this objective.
Policy 9.40.1: Require lighting on private streets, pedestrian oriented areas, and pedestrian walks to meet minimum City standards for street and sidewalk lighting.	**No Conflict.** Refer to the discussion for Goal 9P above.
Policy 9.40.2: Require parking lot lighting and related pedestrian lighting to meet recognized national standards.	**No Conflict.** Refer to the discussion for Goal 9P above. The Project would provide sufficient lighting throughout the Project Site to ensure safety and visibility. The proposed subterranean parking levels and pedestrian walkways would be well illuminated and designed to eliminate areas of concealment.
Policy 9.40.3: Develop regulations to ensure quality lighting to minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare for façade lighting, security lighting, and advertising lighting, including billboards.	**No Conflict.** While this policy is a citywide goal relating to lighting regulations, the Project would not conflict with its implementation. Refer to the discussion for Goal 9P above.

Table 3 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
General Plan Conservation Element (Section 15)	
Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	**No Conflict.** The Project is located in an urban area with relatively flat terrain and built out surroundings. Therefore, publicly available scenic vistas of any valued visual resources in the vicinity of the Project Site (e.g., Hollywood Hills) are not generally available. Furthermore, the Project would enhance the scenic environment along the Los Angeles River and would provide a new landscaped and terraced open space area that would connect the River to the Project Site, thereby creating new opportunities for the aesthetic enjoyment of the River. Thus, the Project would not obstruct or remove access to natural and scenic vistas and would not conflict with this objective.

Project consistency with additional Framework Element goals, objectives, and policies is analyzed under Item XI, Land Use and Planning.

Source: Eyestone Environmental, 2021.

Part 2, Project Description, of this SCEA, which would connect to a landscaped and terraced open space area that would connect to the Los Angeles River Path. A new pedestrian connection to the Los Angeles River Path (and the Project Site) would also be provided from Coldwater Canyon Avenue. The Project's buildings would be organized to create a sequence of exterior landscaped open spaces that would be accessible to the public, and proposed ground-floor commercial uses would also contribute to the activation of the public realm. In addition, streetscape improvement along the project frontages, including landscaping and pedestrian-scaled lighting, would also improve the quality of development and the quality of the public realm. While the Project would increase the height, density, and mass of on-site structures as compared to existing conditions, the Project would include siting, design, and landscape elements that would enhance the overall character of the Project Site and the immediate area. The Project would be stepped back from the Project frontages (e.g., Ventura Boulevard, Coldwater Canyon Avenue, and the Los Angeles River) to reduce architectural massing, with the tallest component of the Project (at seven stories) located in the center of the Project Site and two stories along the River frontage. In addition, the top floor of each building would be further stepped back from the floors below to lower the perceived height of the buildings. There are also buildings withing 0.25 mile of the Project Site along Ventura Blvd. with heights comparable to or greater than to those of the Project. To further reduce massing, the building façades would be articulated through inset residential balconies, light wells, and landscaping. The Project would incorporate a modern, natural materials palette consisting of textured fiber cement cladding, plaster, brick, anodized aluminum, and wood, which would reflect the midcentury modern history of Los Angles, further enhancing the visual environment. The placement of parking in subterranean parking levels would also contribute to the quality of the public realm.

The Project would also support the Framework Element's goals, policies and objectives related to lighting. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all applicable LAMC requirements, including those applicable to projects within the RIO District. In addition, any new street and pedestrian lighting within the public right-of-way would comply with applicable City regulation and would require approval from the Bureau of Street Lighting in order to

maintain appropriate and safe lighting levels on sideways and roadways while minimizing light and glare on adjacent streets.

Overall, the Project design would contribute to the overall quality of the visual environment and would not contrast with the varying design elements of the uses adjacent to the Project Site. The Project would be generally consistent with the applicable goals, policies, and objectives set forth in the Framework Element's regarding scenic quality.

General Plan Conservation Element

Section 5 of the City's General Plan Conservation Element (Conservation Element) recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.[18] As discussed under Section V, Cultural Resources, on page 113, no cultural or historic resources are located on the Project Site and the Project would not directly or indirectly impact any such resources. In addition, Section 15, Land Form and Scenic Vistas, of the Conservation Element, establishes the objective and policy for the protection of natural and scenic vistas as aesthetic resources. The Project Site is located in an urbanized area and does not contain any significant land forms or unique scenic features. However, the Project is located adjacent to the Los Angeles River. The Project would protect and enhance the physical and visual setting of the Los Angeles River, and would make possible public views of this resource for the aesthetic enjoyment of present and future generations. Thus, the Project would not conflict with the objectives related to visual character included in the Conservation Element.

Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

The Urban Design Chapter (Chapter 5) of the Community Plan includes general policies for individual multi-family residential and commercial project and outlines specific standards, designs, and guidelines that carry out the policies for individual projects. The intent of the policies and standards in the Urban Design Chapter for commercial corridors is to provide and maintain the visual continuity of streetscapes and to create an environment that encourages pedestrian and economic activity. For multi-family residential area, the intent is to promote architectural design that enhances the quality of life, living conditions, and neighborhood pride of the residents. As the Project is a mixed-used development containing both commercial and residential uses, not all of the policies are applicable, particularly those related to site planning for commercial uses. However, as outlined further in Table 4 on page 57, the Project would be consistent with the relevant design policies for individual projects included in the Community Plan. The Project would be designed around a courtyard and other landscaped focal points, Including the Los Angeles River, which would serve as amenities for residents and visitors. Specifically, a large residential courtyard would be located toward the interior of the Project Site, adjacent to Building 1. In addition, a landscaped pedestrian entry plaza would be located along Ventura Boulevard that would provide access to an open-air retail plaza, and a publicly accessible outdoor plaza would be located between Building 2 and Building 3, which would connect to a landscaped and terraced open space area

[18] City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. II-9, https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed April 15, 2022.

Table 4
Applicable Goals, Objectives, and Policies of the Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
Residential	
Policy 1-1.2: Protect existing single family residential neighborhoods from new, out-of-scale development.	**No Conflict.** The Project vicinity is developed with a mix of low- to mid-rise commercial, residential, office, and open space uses. Ventura Boulevard in the Project vicinity is characterized by large retail uses including a large-scale grocery store and strip malls, office uses, and surface parking areas. The area transitions to lower density residential uses away from Ventura Boulevard and the other main arterials in the Project vicinity. The nearest single-family residential neighborhood is located to the north of the Project Site, north of the Los Angeles River. The Project would be separated from this neighborhood by the River and the River Paths on both sides of the River, and Valleyheart Drive. While the Project would result in an increase in the building density and maximum height on the Project Site, the Project has been designed so the tallest component would be located in the center of the Project Site, with lower scale residential uses located in the northern portion of the Project Site at two stories(37 feet), closest to the residential neighborhood. Extensive landscaping and pedestrian-scaled amenities would further serve to maintain the scale and character of the area. In addition, the Project's frontage along the Los Angeles River, adjacent to the residential neighborhood, would be upgraded, with the River acting as a focal point to the Project. To that end, the buildings' frontage along the River would be designed with the same design concepts and detail as along the primary frontage, and would include landscaped and terraced open space that would directly connect to the Los Angeles River. These building and site design elements would improve the overall quality of the residential environment on the Project Site and in the surrounding area.
Policy 1-1.3: Protect existing stable single-family and low density residential neighborhoods from encroachment by higher density residential and other incompatible uses.	**No Conflict.** Refer to the discussion for Policy 1-1.2 above. The nearest residential neighborhood to the Project Site is located north of the Los Angeles River. Additional residential neighborhoods are located further from the Project Site to the south. The Project would introduce higher density residential uses, which is permitted on the Project Site pursuant to the C1.5-1VL-RIO zone. Furthermore, as discussed above, the design of the Project would complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area.
Policy 1-1.4: Protect the quality of the residential environment through attention to the appearance of communities, including attention to building and site design.	**No Conflict.** Refer to the discussion for Policy 1-1.2 above. In addition, as discussed below, the Project would adhere to the applicable policies in the Urban Design Chapter of the Specific Plan.
Policy 1-3.1: Seek a high degree of compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.	**No Conflict.** Refer to the discussion for Policy 1-1.2 above. In addition, as discussed below, the Project would adhere to the applicable policies in the Urban Design Chapter of the Specific Plan.

Table 4 (Continued)
Applicable Goals, Objectives, and Policies of the Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
Commercial	
Policy 2-1.3: Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.	**No Conflict.** The Project would develop a high-quality mixed-use development that would complement the existing surrounding uses, which includes commercial, office, residential, and open space uses. As discussed in Part 3, Project Description, of this SCEA, the Project would be designed to provide an indoor-outdoor mixed-use development that would reflect the recreational history of the Sportsmen's Lodge in a setting inspired by the native landscape of the San Fernando Valley and the Los Angeles River Basin. The Project would incorporate the Los Angeles River as a focal point and would enhance the Project Site's interface with all of the public frontages, including the River, Coldwater Canyon Avenue, and Ventura Boulevard. The Project would include a stepped back design to reduce architectural massing, and would incorporate building articulation through inset balconies, light wells, and landscaping. In addition, the Project would incorporate a material palette that would reflect the midcentury modern history of Los Angeles, creating a balance with the large, glazed areas of the façade. Extensive landscaping throughout the Project Site and along the site perimeter, including a terraced and landscaped area connecting the Project Site to the River, and a landscaped entry plaza along Ventura Boulevard, would further unify the site and enhance the surrounding area.
Policy 2-3.5: Require that mixed use projects and development in pedestrian oriented districts be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses.	**No Conflict.** Refer to the discussion for Policy 2-1.3 above.
Policy 2-4.1: Require that any proposed development be designed to enhance and be compatible with adjacent development.	**No Conflict.** Refer to the discussion for Policy 1-1.2 and Policy 2-1.3 above.
Policy 2-4.2: Preserve community character, scale and architectural diversity.	**No Conflict.** Refer to the discussion for Policy 1-1.2 and Policy 2-1.3 above.
Policy 2-4.3: Improve safety and aesthetics of parking areas in commercial areas.	**No Conflict.** The Project would remove the existing surface parking areas on the Project Site, consisting of 587 spaces, and would provide all parking for the Project Site and the adjacent Shops at Sportsmen's Lodge (The Shops Development) within three subterranean levels. This would allow for the safest and most efficient use of parking resources across the Project Site and the adjacent uses. It would also improve safety as it would limit conflicts between pedestrians and vehicles. The parking levels would be well illuminated and designed to eliminate areas of concealment. Furthermore, the Project would incorporate various security measures in the parking structure to enhance on-site security, including an alarm system, a closed circuit security camera system, and secure entry.

Table 4 (Continued)
Applicable Goals, Objectives, and Policies of the Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
Parking	
Policy 15-1.3: New parking lots and garages shall be developed in accordance with design standards.	**No Conflict.** The Project would provide 1,385 vehicular parking spaces (consisting of 730 residential spaces and 655 commercial spaces for the Project and the adjacent The Shops Development) in three subterranean levels. As no above-grade parking would be included, design standards are not applicable. However, the access points to the parking levels would be visually integrated into the overall Project Site and would include landscaping elements and appropriate signage.
Chapter 5—Urban Design	
Design for Individual Projects	
Commercial	
Site Planning: Structures shall be oriented toward the main commercial street where a parcel is located and shall avoid pedestrian/ vehicular conflicts by: 1. Locating surface parking to the rear of structures. 2. Minimizing the number of driveways providing sole access to the rear of commercial lots. 3. Maximizing retail and commercial service uses along frontages of commercial developments 7. Requiring site plans which include ancillary structures, service areas, pedestrian walkways, vehicular path, loading areas, drop off and landscaped areas. 8. Provide where feasible, the under grounding of new utility service.	**No Conflict.** The Project is a mixed-use development that includes retail and restaurant uses that would be oriented around a central open-air retail plaza, with extensively landscaped entry plazas along Ventura Boulevard and the Los Angeles River. Parking would be located underground, with vehicular access points located along Ventura Boulevard and Coldwater Canyon Avenue. All other loading and service areas would also be located in the subterranean parking levels. The Project would further create an environment that encourages pedestrian activity by providing landscaped walkways and gathering areas that connect to the commercial and residential uses. Ground-floor retail and restaurant uses that would be designed to a pedestrian scale. The Project would also provide a passenger loading zone along Ventura Boulevard. New on-site utilities that may be required to serve the Project will be installed underground. Additionally, mechanical, electrical, and rooftop equipment would be integrated into the Project's architectural design, and trash collection areas associated with the proposed buildings will be enclosed or otherwise screened from view from public rights-of-way.
Height and Building Design: The mass, proportion and scale of all new buildings and remodels shall be at a pedestrian scale. The design of all proposed projects shall be articulated to provide variation and visual interest, and enhance the street scape by providing continuity and avoiding opportunities for graffiti. Building materials shall be employed to provide relief to bland untreated portions of exterior building façades. The purpose of these provisions is to ensure that a project avoids large sterile expanses of building walls, is designed in harmony with the surrounding neighborhood and creates a stable environment with a pleasant and desirable character. Accordingly, the following	**No Conflict.** The Project would consist of three buildings that would range in height from 37 feet inches to 94 feet, as measured to the highest point of the buildings, including rooftop projections per the Ventura-Cahuenga Boulevard Corridor Specific Plan. The Specific Plan permits 30 feet in height and up to 45 feet in height for buildings designed with stepbacks. The Density Bonus incentive/waiver requested by the Project would waive the transitional height limits and allow for a maximum height of 94 feet. The ground-floor retail and restaurant uses include storefront glazing to provide maximum visibility and natural light. In addition, the design of the buildings would incorporate articulations, recesses, and perforations to break up the building façades. The building façades would be clad with textured fiber cement, plaster, brick, anodized aluminum, and wood, which would create a balance with the glazed areas of the façade. Mechanical and electrical equipment would be screened from view and trash

Table 4 (Continued)
Applicable Goals, Objectives, and Policies of the Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
policies are proposed. 3. No structure should exceed two stories in height within 15 feet and 30 feet of front and rear property lines, respectively. 2. Maximizing the area devoted to transparent building elements, for front façades and façades facing rear parking. 3. Requiring the use of articulations, recesses, surface perforations, and porticoes to break up long, flat building façades. 4. Providing accenting, complementary building materials to building façades. 5. Maximizing the applications of architectural features or articulations or building façades. 6. Designating architecturally untreated façades for signage. 7. Screening of mechanical and electrical equipment from public view. 8. Screening of all rooftop equipment and building appurtenances from public view. 9. Requiring the enclosure of trash areas for all projects	areas would be enclosed.
Parking Structures: Parking structures shall be integrated with the design of the buildings they serve: 1. Designing parking structure exteriors to match the style, materials and color of the main building. 2. Landscaping to screen parking structures not architecturally integrated with the main building. 3. Utilizing decorative walls and landscaping to buffer residential uses from parking structures.	**No Conflict.** The Project would provide up to 1,385 vehicle parking spaces (consisting of 730 residential spaces and 655 commercial spaces for the Project and the adjacent The Shops Development) within three subterranean parking levels. As such, the design standards do not apply. However, the access points to the parking levels would be visually integrated into the overall Project Site and would include landscaping elements and appropriate signage.
Light and Glare: 1. Installing on-site lighting along all pedestrian walkways and vehicular access ways. 2. Directing on-site lighting onto driveways and walkways, away from adjacent residential uses.	**No Conflict.** The Project would include low-level lighting throughout the Project Site, including along pedestrian walkways; at the two vehicular access points; and within the subterranean parking levels. All exterior lighting would be shielded or directed toward the areas to be illuminated to limit light spillover onto off-site uses and would meet all applicable LAMC lighting standards.
Multi-Family Residential	
Site Planning: All multiple residential projects, of five or more units shall be designed around a landscaped focal point or courtyard to serve as an amenity for residents. Toward that goal the following policies are proposed: 1. Providing a pedestrian entrance at the front of	**No Conflict.** The residential uses would be organized around a large, landscaped residential courtyard that would be surrounded by Building 1. This courtyard would be connected to other portions of the Project Site, including the other structures and the River access, by landscaped pedestrian pathways. In total, the Project would include approximately

Table 4 (Continued)
Applicable Goals, Objectives, and Policies of the Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
each project. 2. Requiring useable open space for outdoor activities, especially for children.	79,366 square feet of open space, including approximately 66,816 square feet of common open space (52,520 square feet of exterior common open space and approximately 14,296 square feet of interior common space), which would exceed the requirements of the LAMC, and approximately 12,550 square feet of private open. Of this open space, approximately 21,039 square feet would be accessible to the public. In addition, the Project would enhance pedestrian access to the River, which would provide additional open space for outdoor activities.
Design: The design of all buildings shall be of a quality and character that improves community appearance by avoiding excessive variety and monotonous repetition. This policy can be accomplished through: 1. Requiring the use of articulations, recesses, surface perforations and porticoes to break up long, flat building façades. 2. Utilizing complementary building materials. 3. Incorporating varying designs to provide definitions for each floor. 4. Integrating building fixtures, awnings, security gates, etc. into the design of the building. 5. Screening of all rooftop equipment and building appurtenances from adjacent properties 6. Requiring decorative, masonry walls to enclose trash.	**No Conflict.** The massing of the proposed buildings would be articulated with a wide range of configurations that would avoid excessive variety or monotonous repetition. The buildings would vary in height and would be stepped back from the surrounding public frontages, with the largest component located in the center of the Project Site. The top floor of each building would be further stepped back from the floors below to lower the perceived height of the buildings. The building façades would be clad with textured fiber cement, plaster, brick, anodized aluminum, and wood, which would create a balance with the glazed areas of the façade. Rooftop equipment and building appurtenances would be screened from view and trash areas would be enclosed.

Project consistency with additional Community Plan goals, objectives, and policies is analyzed under Item XI, Land Use and Planning.

Source: Eyestone Environmental, 2021.

directly connecting to the Los Angeles River. Overall, the Project would include 79,366 square feet of open space, consisting of 66,816 square feet of common open space (52,520 square feet of exterior common open space and 14,296 square feet of interior common space), which would exceed the LAMC requirements of 57,225 square feet. The Project would also include approximately 12,550 square feet of private open space. Approximately 21,039 square feet of the on-site open space would be accessible to the public.

Furthermore, the design of the buildings would avoid both excessive variety and monotonous repetition. As discussed above, the buildings would be stepped back along all of the Project frontages (e.g., Ventura Boulevard, Coldwater Canyon Avenue, and the Los Angeles River) to reduce architectural massing. In addition, building façades would be articulated through inset residential balconies, light wells, and landscaping and would incorporate a variety of complementary buildings materials that would serve to break up the façades. Consistent with the Community Plan, rooftop equipment and trash collection areas

would be screened from view and all of the parking would be provided in subterranean levels, thereby integrating the parking structure into the design of the buildings.

Consistent with the design policies included in the Community Plan for commercial uses, the Project would create an environment that encourages pedestrian activity by providing ground-floor retail and restaurant uses that would be accessible via an open-air plaza that would connect to an entry plaza from Ventura Boulevard. Ground-floor commercial uses would be designed to a pedestrian scale with pedestrian amenities, such as gathering areas, seating, and pedestrian-scaled lighting, provided. Also consistent with the Community Plan, lighting would be directed away from the proposed adjacent residential uses.

Thus, based on the above, the Project would create a pedestrian-friendly environment and would promote architectural design that would enhance quality of life. Thus, the Project would be generally consistent with the applicable goals, policies, and objectives set forth in the Community Plan regarding scenic quality.

Ventura-Cahuenga Boulevard Corridor Specific Plan

The Ventura-Cahuenga Boulevard Corridor Specific Plan (Specific Plan), which covers the communities of Woodland Hills, Tarzana, Encino, Sherman Oaks, and Studio City, strives to maintain an equilibrium between the transportation infrastructure and land use development in the Corridor and within each of these communities. The Project Site is located within the Studio City/Cahuenga Pass Community of the Specific Plan and is designated as Neighborhood and General Commercial in the Specific Plan. The Specific Plan does not include goals, objectives, or policies, but it does outline several purposes related to aesthetics, including building and site design, compatible and harmonious relationship between residential and commercial development, community aesthetics, landscaping, and the pedestrian environment. The Project's general consistency with the applicable purposes related to aesthetics is outlined in Table 5 on page 63.[19]

With regard to land use regulations and building limitations for projects within the Neighborhood and General Commercial Plan Designation of the Specific Plan, the Project would adhere to the regulations regarding lot coverage, landscaping, parking, parking structures, and signage. With regard to height, the Project would reach a maximum heigh of 94 feet as measured to the highest building element, which exceeds the allowable height of 30 feet (or up to 45 feet for buildings with setbacks). Furthermore, the Project would have a maximum FAR of 2.84:1, which exceeds the maximum FAR of 1.0:1. The Project would also include a zero-foot rear setback on Parking Level P1, which does not meet the required 20-foot rear setback; and zero-foot side yard setbacks on Parking Level P1, which do not meet the required 10-foot side yard setback. As discussed above, the Project would request approval of Density Bonus incentives/waivers to allow relief from the height, FAR, and rear and side yard setback requirements on Parking Level P1. Refer to Item XI, Land Use and Planning, of this SCEA, which includes a detailed discussion of the Project's consistency with the regulations and building limitation

[19] As previously discussed, the Los Angeles Department of City Planning is currently preparing an amendment to the Specific Plan and is in the initial CEQA compliance phase. Thus, for purposes of this SCEA, the analysis is limited to the currently adopted Ventura-Cahuenga Boulevard Corridor Specific Plan

Table 5
Applicable Purposes of the Specific Plan

Purpose	Analysis of Project Consistency
Purpose A: To assure that an equilibrium is maintained between the transportation infrastructure and land use development in the Corridor and within each separate community of the Ventura-Cahuenga Boulevard Corridor Specific Plan area.	**No Conflict.** The Project would include a mix of uses in an area that is designated as a High Quality Transit Area (HQTA), generally defined as walkable transit village or corridor that is within 0.5 mile of an existing or planned fixed transit stop or bus transit corridor with a 15-minute or less service frequency during peak commute hours, and that is well served by transit. In addition, the Project would include TDM strategies that would reduce vehicle trips and VMT. Thus, an equilibrium between transportation and land use would be achieved.
Purpose C: To provide building and site design guidelines to promote attractive and harmonious multi-family and commercial development	**No Conflict.** The Project would consist of a mix of uses, including multi-family residential and commercial, that would be designed to unify and enhance the overall aesthetic environment of the Project Site and surrounding area. The buildings would incorporate a stepped back design to reduce architectural massing, and would incorporate building articulation through inset balconies, light wells, and landscaping. In addition, the Project would include a material palette that would create a balance with the large, glazed areas of the façade. The Project Site would be connected by pedestrian pathways and various plazas and gathering areas that would include landscape features. Enhancements to the area fronting the Los Angeles River would further contribute to the quality of the visual environment. As discussed above, the Project would be consistent with applicable standards in the Urban Form and Neighborhood Design Chapter of the General Plan Framework Element as well as the Urban Design Chapter of the Community Plan. As such, the Project would not conflict with this purpose.
Purpose E: To provide a compatible and harmonious relationship between residential and commercial development where commercial areas are contiguous to residential neighborhoods.	**No Conflict.** The Project is a mixed-use development that is designed to provide a compatible and harmonious relationship between the residential and commercial uses. The Project Site as a whole would provide an inviting setting that would be physically and functionally integrated. Refer to Purpose C, above.
Purpose F: To preserve and enhance community aesthetics by establishing coordinated and comprehensive standards for signs, buffering, setbacks, lot coverage, and landscaping.	**No Conflict.** This purpose does not apply to individual projects. Nevertheless, the Project would support it by adhering to the standards outlined in the Specific Plan, as discussed under Item XI, Land Use and Planning, of this SCEA.

Source: Eyestone Environmental, 2021

included in the Specific Plan. Overall, with approval of the requested incentives/waivers, the Project would be consistent with the Specific Plan.

Citywide Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

The Project would enhance the pedestrian experience adjacent to and within the Project Site by incorporating a design that would provide a safe, comfortable, and accessible environment. Specifically, the Project would include landscaping elements along the Project frontages on Coldwater Canyon Avenue, Ventura Boulevard, and the Los Angeles River that would be consistent with the Ventura–Cahuenga Boulevard Corridor Specific Plan. A landscaped pedestrian entry plaza would be located within the Project setback along Ventura Boulevard, which would lead to open air retail plaza internal to the Project Site. Ground floor retail and restaurant uses that connect to the landscaped pathways and open space areas would further activate the pedestrian experience. In addition, pedestrian access to the Los Angeles River Path would be enhanced by the Project via a landscaped and terraced open space area located between Building 2 and Building 3 and via Coldwater Canyon Avenue. The Project would also include pedestrian-scale lighting and visibility at the ground floor. Pedestrian spaces would be separated from vehicular circulation to enhance safety, and would include a passenger loading area that would be provided along Ventura Boulevard. All parking would be located in the three subterranean parking levels with access provided via Ventura Boulevard and Coldwater Canyon Avenue. These proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. The Project would also comply with Americans with Disabilities Act (ADA) requirements. To increase pedestrian safety and encourage connection to the surrounding residential neighborhoods, the Project would include safety modifications to the existing intersections at Ventura Boulevard and Goodland Avenue and Coldwater Canyon Avenue and Valleyheart Drive consisting of lighted intersections with pedestrian crosswalks. Thus, based on the above, Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Vehicular access to the Project Site would be provided via a two-way ramp along Coldwater Canyon Avenue located in the northwest corner of the Project Site and a two-way ramp along Ventura Boulevard located in the southeast corner of the Project Site. Both ramps would provide immediate access to the subterranean parking levels that would serve the on-site uses, and all parking and loading activities would take place within the subterranean parking levels, thereby reducing vehicle and pedestrian interactions on the Project Site. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. Emergency vehicle access would be provided via a driveway from Ventura Boulevard along the eastern boundary of the Project Site. A passenger loading area would be provided along Ventura Boulevard with access to the primary pedestrian entryway to the Project Site, and pedestrian access to the Project Site and the Los Angeles River Path would also be provided along Coldwater Canyon Avenue.

Thus, consistent with Guideline 2, vehicular access to the Project Site would not degrade the pedestrian experience.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

As described above, the Project would incorporate landscaping and pedestrian-scaled amenities that would maintain human scale within, and along the perimeter of, the Project Site. A landscaped entry plaza along Ventura Boulevard would provide a pedestrian connection to the Project's ground floor retail and restaurant uses. Pedestrian amenities including gathering areas and outdoor seating would further activate the pedestrian environment. In addition, The Project's building mass along all of the public frontages would step back as it rises in height from two stories along the River frontage to seven stories in the interior of the Project Site. The top floor of each building would be further stepped back from the floors below to lower the perceived height of the buildings. In addition, residential balconies and terraces would be provided along building façades fronting Ventura Boulevard and the Los Angeles River Path to strengthen the human scale of the architecture and interaction with the public frontages. Furthermore, the Project would provide a landscaped and terraced open space area directly connecting to the Los Angeles River Path and Coldwater Canyon Avenue, further engaging with public spaces. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale.

Guideline 4: Organize and shape projects to recognize and respect surrounding context.

The area surrounding the Project Site is predominantly developed with low- to mid-rise commercial, residential, office, and open space uses. Land uses adjacent to the Project Site include the Los Angeles River to the north and residential uses north of the River, the Shops at Sportsmen's Lodge commercial development and a gas station to the west, retail uses to the south (across Ventura Boulevard), and commercial uses to the east. The Project would be designed to be compatible with the general urban character of the surrounding neighborhood. As described above, the proposed buildings would incorporate at stepped back design, with the tallest elements located in the center of the Project Site. In addition, the buildings would be arranged to create publicly-accessible landscaped spaces between buildings and along the perimeter of the Project Site that would align with the existing street intersections, thereby creating a natural connection between the Project Site and the surrounding neighborhoods and providing enhanced connections to the Los Angeles River Path. In total, approximately 21,039 square feet of the Project's open space areas would be accessible to the public. Extensive landscaping would enhance these public connections while providing visual interest along the perimeter of the Project Site. Thus, consistent with Guideline 4, the Project would recognize and respect the surrounding context.

Guideline 5: Express a clear and coherent architectural idea.

The Project's overall architectural idea expresses a connection to the midcentury modern history of Los Angeles, with a landscape design that reflects the natural landscapes of the San Fernando Valley. The Project would incorporate a variety of design elements that would relate to this overarching theme. The Project would incorporate a modern, natural materials palette that would include dark and natural hues to create a balance with large, glazed areas of the building façades. Further building articulation would be created by inset residential balconies, light wells, and landscaped terraces. In addition, as previously discussed, the proposed buildings would be stepped back from the perimeter of the Project Site to reduce architectural massing while providing additional visual interest and articulation. The top floor of each building would be further stepped back from the floors below to lower the perceived height of the

buildings. Extensive landscaping and architectural lighting would further contribute to the clear and cohesive design. Furthermore, by locating all vehicular activity in subterranean parking levels, the Project's site plan can employ a clear and unified design that connects to the Project Site's three public frontages through a sequence of publicly accessible landscaped pathways. All of these elements would collectively express a clear and coherent architectural design, consistent with Guideline 5.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.

The Project's buildings would be organized to create a sequence of exterior landscaped walkways and open spaces that are accessible to the public. An open air plaza would be located adjacent to the ground floor retail and restaurant, providing a comfortable gathering space for visitors of the Project Site. In addition, a publicly accessible event space would be located between Building 2 and Building 3 to accommodate a variety of uses by the local community. This space would connect to the Los Angele River Path. The Project would also include pedestrian-scale lighting and visibility at the ground floor which would provide an inviting, comfortable user experience. In addition, amenities to serve the residents of the Project and their guests would also be provided, including a large residential courtyard located toward the interior of the Project Site, adjacent to Building 1, that would feature seating for outdoor dining, lounge seating, and landscaping. In addition, the roof (Level 7) of Building 1 would include a pool and deck, and the roof (Level 3) of Building 2 would include an amenity deck overlooking the Los Angeles River. Thus, consistent with Guideline 6, the Project would provide amenities that support community building and provide an inviting, comfortable user experience.

Guideline 7: Carefully arrange design elements and uses to protect site users.

All parking for the Project would be provided in the subterranean parking levels, thereby minimizing interaction between pedestrian and vehicles and increasing safety. Vehicular access to the subterranean parking would be provided via a two-way driveway along Coldwater Canyon Avenue (at Valleyheart Drive) and a two-way driveway along Ventura Boulevard (At Goodland Avenue). As discussed in the Transportation Assessment prepared for the Project and included in Appendix L of this SCEA, the Project would include the installation of traffic lights and pedestrian crosswalks at both of these intersections. This would provide additional crossing opportunities and improve safety at the conflict points between vehicles and pedestrians and bicyclists. The Project would also promote pedestrian safety by incorporating a pedestrian loading zone along Ventura Boulevard that is separated from traffic lanes. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry to the commercial and residential uses. Thus, consistent with Guideline 7, the Project would arrange design elements and uses to protect site users.

Guideline 8: Protect the site's natural resources and features.

The Project Site is located in an urbanized area and is currently developed with hotel and associated uses. As discussed further below, there are no protected natural resources or features on the Project Site. Landscaping within the Project Site includes a variety of trees, shrubs, and other plantings, none of which are subject to the City of Los Angeles Protected Tree and Shrub Relocation and Replacement

Ordinance.[20] As outlined below, the Project would include mitigation measures (BIO-MM-1 through BIO-MM-5) to ensure that the protected tree, a coast live oak (Quercus agrifolia) tree, located adjacent to the northeast corner of the Project Site, is protected. The Los Angeles River runs along the northern boundary of the Project Site, and the Los Angeles River Path is located on the south side of the River, adjacent to the Project Site. The Project would not directly impact the River, and any potential indirect impacts would be avoided with implementation of Project Design Feature BIO-PDF-1, outlined below. Furthermore, the Project would provide access to the River and enhance the River Path adjacent to the Project Site. Thus, the Project would protect the Site's (and adjacent properties') natural resources and features consistent with Guideline 8.

> Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.

As discussed in Section 2, Project Description, of this SCEA, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen). The Project's design is based on principles of smart growth and environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit. "Green" features would include energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials wherever applicable. Furthermore, the Project's buildings are designed to maximize access to natural light within the residential units, providing large windows with multiple exposures, where possible, thereby reducing the need for daytime lighting. In addition, the Project would provide roof overhangs, where possible, to reduce glare and solar heat gain. Direct solar exposure, and the subsequent increase in energy demand, would be further reduced by the arrangement of buildings, which would naturally shade each other, and the articulation provided by light wells, balconies, and shifts in orientation, which would create more shade on the building façades without reducing interior exposure to views and sunlight. Therefore, the Project would lower energy demand and increase the comfort and well-being of users through site layout, building massing, and orientation.

> Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat

The Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff. As part of these requirements, the Project would manage stormwater through a capture and reuse and/or biofiltration system. This system would capture stormwater runoff that would then be used for irrigation of the new landscaping around the Project Site. Provisions for harvesting and filtering greywater will also be provided for landscape irrigation use. In addition, the Project would incorporate extensive drought tolerant landscaping throughout the Project Site, including green roof landscaping at the podium level, adding natural habitat and open space for users.

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[20] The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873, updated February 4, 2021) applies to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species as well as Mexican Elderberry and Toe yon shrub species that are native to Southern California, and excludes trees or shrubs grown or held for sale by a licensed nursery or trees planted or grown as part of a tree planting program.

Thus, consistent with Guideline 10, the Project would enhance green features to increase opportunities to capture stormwater and promote habitat.

California Code of Regulations

Title 24 of the California Code of Regulations, also known as the California Building Standards Code, consists of regulations to control building standards throughout the State. The components of Title 24 that include standards related to lighting would be applied to the Project. In general, Project lighting would be designed to provide efficient and effective lighting while minimizing light trespass from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Outdoor lighting would be shielded and directed towards the interior of the Project Site such that the light source would not project directly upon any adjacent property. In addition, the Project would adhere to minimum light intensities along pedestrian pathways, circulation ways, and paths of egress. Furthermore, the Project would comply with lighting control and cutoff requirements, power density allowances, and sign lighting controls. The Project would also adhere to the lighting standards regarding maximum allowable light levels, efficiency requirements, control requirements, and light trespass requirements. In addition, the Project would adhere to all applicable LAMC lighting standards. Thus, the Project would comply with all of the applicable aesthetic-related provisions including in Title 24 of the California Code of Regulations, including the California Building Code (Title 24, Part 1), California Electrical Code (Title 24, Part 3), the California Energy Code (Title 24, Part 6), and the California Green Building Standards Code (Title 24, Part 11).

Based on the above, the Project would not conflict with applicable regulations governing scenic quality, including those contained in the LAMC, General Plan Framework Element, General Plan Conservation Element, Community Plan, Specific Plan, Citywide Design Guidelines, and California Code of Regulations. Therefore, impacts would be less than significant.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The Project Site is currently developed with the Sportsmen's Lodge Hotel and associated facilities along with surface parking, which generate moderate levels of artificial light and glare. Light sources within the Project Site include low-level security lighting, vehicle headlights, interior lighting emanating from the existing hotel, surface parking lot lighting, and architectural lighting. Existing glare sources within the Project Site include glass and metal vehicle and building surfaces. The surrounding ambient nighttime lighting environment is typical of an urban environment. The primary nighttime lighting sources in the Project Site vicinity include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, street lamps, and security/parking lighting.

The proposed Project would introduce new sources of light and glare that are typically associated with residential and commercial uses, including interior lighting, architectural lighting, security and wayfinding lighting, and exterior lighting for outdoor common spaces. In the immediate Project vicinity, the nearest off-site receptors that are considered sensitive relative to light and glare are motorists along Ventura Boulevard and Coldwater Canyon Boulevard. The nearest residential uses are located north of the Los Angeles River and south of the commercial uses on the south side of Ventura Boulevard. Impacts related to light and glare during both construction and operation are discussed below.

Construction

While the majority of construction would occur during daylight hours, construction activities could potentially require the use of artificial light if construction were to occur in the evening. In accordance with the provisions of LAMC Section 41.40, construction activities are permitted between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays, with no construction permitted on Sundays. During construction of the Project, exterior lights would be used for the duration needed if construction were to occur in the evening hours during the winter season when daylight is no longer sufficient. Construction lighting would be used for safety and security purposes only and would be shielded and directed downwards to prevent light spillover and ensure that no direct beam illumination is provided outside of the Project Site boundary. Therefore, construction activities would not result in a new source of substantial light which would adversely affect nighttime views in the area, and impacts would be less than significant.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. Minor amounts of glare could also occur due to on-site vehicles. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, as noted above, construction would primarily occur during the daytime hours in accordance with the LAMC. Therefore, there would be a negligible potential for nighttime glare associated with construction activities to occur, and impacts would be less than significant.

Operation

The Project would replace the existing on-site hotel uses and surface parking areas with three low- to mid-rise buildings. The new buildings would increase the number of windows and interior lighting emanating from the Project Site and would increase the number of vehicle trips to and from the Project Site. New sources of artificial light that would be introduced by the Project would include interior lighting visible through the windows of the residential and commercial uses and from balconies and patios; signage lighting, architectural lighting; low-level security and wayfinding lighting; landscape lighting; exterior lighting for outdoor common spaces, including ground-level commercial uses and rooftop uses and activities; and automobile headlights. New sources of glare would include building surfaces and Project-related vehicles.

The proposed lighting sources would be similar to other lighting sources in the Project vicinity and would not generate artificial light levels that are out of character with the surrounding area. The Project Site is in an urbanized area and is located along major roadways (i.e., Ventura Boulevard to the south and Coldwater Canyon Avenue to the west), which generate high levels of nighttime lighting. The Project would remove the existing on-site surface parking and would locate parking within a subterranean parking garage that would be entirely enclosed, thereby removing existing sources of light and glare. In addition, as required by LAMC Section. 93.0117(b), exterior light sources and building materials would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units. Furthermore, as required by RIO District designation, Project lighting would produce a maximum initial luminance value no

greater than 0.20 horizontal and vertical foot candles at the Project Site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the Project Site. In addition, no more than five percent of the total initial designed lumens shall be emitted at an angle of 90 degrees or higher from nadir.

Signage on the Project Site would include identify signage, commercial tenant signage, and general ground-level and pedestrian directional/wayfinding signage. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. In accordance with the LAMC (Chapter 1, Article 4.4, Section 14.4.4 E), illumination used for Project signage would be limited to a light intensity of 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

With regard to glare, the Project would be designed in a contemporary architectural style that reflects the midcentury modern history of Los Angeles. Accordingly, the Project would feature various surface materials that have dark or natural hues, including textured fiber cement cladding, plaster, brick, anodized aluminum, and wood, none of which generate glare. The Project would use anti-reflective glass or glass that has been treated with an anti-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight.[21] In addition, parking would be located in fully enclosed subterranean levels, eliminating the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night. While headlights from vehicles entering and exiting the Project's subterranean parking levels would be visible from the residential receptors to the north and south of the Project Site during the evening hours, such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact.

The Project would adhere to existing regulatory requirements regarding light and glare, including those contained in the LAMC, the City's Green Building Code, and CALGreen (e.g., LAMC Section 93.0117(b), LAMC Section 99.05.106.8, CALGreen Section 5.106.8). ***Thus, based on the above, construction and operation of the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and impacts would be less than significant.***

Shading Threshold (*2006 L.A. CEQA Thresholds Guide*): Would the Project result in shadow sensitive uses being shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November)

Shading is a common and expected occurrence in urban areas and is often considered a beneficial feature of the environment when it provides cover from excess sunlight and heat. However, shading can have an adverse impact if it substantially interferes with the enjoyment or performance of sun-related activities, particularly on routinely usable outdoor open space areas. While some incidental shading on shadow sensitive uses is commonly acceptable, shading that occurs over extended periods of time can be considered a detriment to certain uses. Thus, the analysis of a project's potential shading impact focuses on changes in shading conditions for those off-site uses and activities that are dependent on access to

[21] Consistent with applicable energy and building code requirements, including Section 1 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

natural light. According to the *L.A. CEQA Thresholds Guide*, facilities and operations sensitive to the effects of shading include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses; commercial uses, such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to their function, physical comfort, or commerce. Shade-sensitive uses in the immediate Project vicinity include the Weddington Golf and Tennis Club located to the northeast of the Project Site, outdoor dining areas located within the Shops at Sportsmen's Lodge Development located directly west of the Project Site, and outdoor areas associated with private residences located north of the Project Site. The Los Angeles River Path is considered a transitory use, as users of the River Path are utilizing it for walking or bicycling and, thus, are not stationary and potentially negatively impacted by shade. Therefore, the Los Angeles River Path is not considered to be a shade-sensitive use.

The analysis of the Project's shading impacts assesses several shade-related factors, including local topography, the height and bulk of the Project's structural elements, the sensitivity of surrounding uses (as discussed above), the amount of sensitive uses that are impacted by shading, the season of the year, and the duration of shadow projection. As previously discussed, shading impacts were evaluated in accordance with the *L.A. CEQA Thresholds Guide*. Project shadows were modeled and plotted for the representative hours during the winter solstice, summer solstice, fall equinox, and spring equinox. Specifically, shadow lengths were plotted for the following time periods by season:

Season	Date	Time of Day
Winter Solstice (PST)	December 21	9 A.M. PST to 3 P.M. PST
Summer Solstice (PDT)	June 21	9 A.M. PDT to 5 P.M. PDT
Fall Equinox (PDT)	September 22	9 A.M. PDT to 5 P.M. PDT
Spring Equinox (PDT)	March 21	9 A.M. PDT to 5 P.M. PDT

PST = Pacific Standard Time
PDT = Pacific Daylight Savings Time

These hours represent the period of the day relevant to the assessment of impacts pursuant to the thresholds of significance set forth in the *L.A. CEQA Thresholds Guide*. For the purpose of establishing the hours in which significant impacts may occur, winter is described as occurring during Pacific Standard Time, which occurs between the first Sunday of November through the second Sunday in March; and spring, summer, and fall are described as occurring during Pacific Daylight Time, which occurs between the second Sunday in March and the first Sunday of November.

The Project's projected shadows for these hours have been determined based on a model of the Project prepared by Marmol Radziner that identifies the specific building footprint and maximum building height. The resulting shading diagrams are included in Appendix A of this SCEA. Based on the projected shadows, the Project's incremental effect on the duration of shading on each of the identified sensitive uses is determined and assessed against the thresholds of significance outlined above. As shown in Appendix A, the Project would not shade any of the identified sensitive uses for more than three hours during any of the time periods or seasons. Specifically, outdoor areas associated with private residences located adjacent to the Weddington Golf and Tennis Club would experience minimal shading by the

Project in the late afternoon (i.e., 5:00 P.M.) during the fall equinox and winter solstice. No other sensitive uses would be shaded by the Project.

Based on the above, the Project would not result in shading of shadow sensitive uses for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time. Thus, no shading impacts would occur.

Cumulative Impacts

Less Than Significant Impact. A cumulative analysis of aesthetics impacts includes the related projects that would be sufficiently close to influence the visual character of the immediate Project area, that fall within the same viewshed as the Project, or that affect the same off-site sensitive uses could pose cumulative effects in conjunction with the Project. As shown in Figure 16 on page 330 in the analysis further below, only Related Project No. 4, which consists of the fully constructed and occupied adjacent The Shops Development, is close enough to the Project to be considered in the cumulative analysis. Similar to the Project, Related Project No. 4 involves the redevelopment of existing uses within an urbanized area of the City. Development of the Project along with related projects would result in an incremental intensification of land uses in the Project vicinity. However, the Project and related projects, including Related Project No. 4, would be required to comply with applicable City regulations, design guidelines, and other land use and zoning controls regarding density, floor area, lighting, and design. Furthermore, as described above, the Project would result in less than significant impacts regarding scenic vistas, visual character, and light and glare. ***Therefore, the Project's contribution to cumulative impacts regarding aesthetics would not be cumulatively considerable and cumulative impacts would be less than significant.***

II. AGRICULTURE AND FOREST RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM AG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential.

b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.

c) Maintain and expand agricultural land protections such as urban growth boundaries.

d) Provide for mitigation fees to support a mitigation bank[22] that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.

e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.

f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.

Applicability to the Project

As analyzed below, the Project would not convert farmland to a non-agricultural use, and therefore, PMM AG-1 is not applicable to the Project.

PMM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined

[22] The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see https://www.wildlife.ca.gov/Conservation/Planning/Banking).

appropriate by each Lead Agency, may include the following, or other comparable measures:

a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts.

b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection

Applicability to the Project

The Project Site is not zoned for agricultural production, there is no farmland on the Project Site, and there are no Williamson Act Contracts in effect for the Project Site. Thus, PMM AG-2 is not applicable to the Project.

PMM AG-3: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.

Applicability to the Project

The Project Site does not contain forest land or timberland and therefore, PMM AG-3 is not applicable to the Project.

PMM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, **may** include the following, or other comparable measures:

a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.

b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.

c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access

as necessary to ensure that economically viable farming operations are not interrupted.

Applicability to the Project

The Project Site is not zoned for agricultural uses and there is no farmland on the Project Site. Thus, PMM AG-4 is not applicable to the Project.

PMM AG-5: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.

Applicability to the Project

The Project Site is not zoned for agricultural uses and is not located adjacent to agricultural uses. Thus, PMM AG-5 is not applicable to the Project.

Impact Analysis

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site is located in an urbanized area of the City. As discussed in Section 3, Project Description, of this SCEA, the Project Site is currently developed with hotel uses and surface parking. No agricultural uses or operations occur on-site or directly adjacent to the Project Site. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[23] ***Thus, the Project would not convert farmland to a non-agricultural use and no impact would occur.***

[23] City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 2375021027, 2375021028, and 2375021029, http://zimas.lacity.org/, accessed June 2, 2021.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned C1.5-1VL-RIO (Limited Commercial, Height District 1VL, River Improvement Overlay), with the northeast portion of the Project Site adjacent to the Los Angeles River zoned R4P-1VL-RIO (Multiple Dwelling or Parking, Height District 1VL, River Improvement Overlay). As such, the Project Site is not zoned for agricultural use. Furthermore, with one exception, no agricultural zoning is present in the surrounding area. The golf and tennis club located east of the Project Site and north of the Los Angeles River, is zoned A1-1XL-RIO, which is an agricultural zone. However, the property is not used for agricultural purposes and is not enrolled under a Williamson Act contract. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.[24] ***Therefore, the Project would not conflict with any existing zoning for agricultural uses or a Williamson Act Contract and no impact would occur.***

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with hotel uses and surface parking. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial uses and is not zoned and/or used as forest land.[25] ***Thus, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by Public Resources Code section 12220(g), Public Resources Code section 4526, and Government Code section 51104(g) and no impact would occur.***

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site zoned for commercial uses and is developed with a hotel and associated uses and surface parking. The Project Site is located in an urbanized area and is not used as forest land. ***Therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use and no impact would occur.***

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As described above, the Project Site is located within an urbanized area and there is no farmland or forest land on or near the Project Site. ***Therefore, the Project would not result in the***

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[24] California Department of Conservation, The Williamson Act Status Report 2016–17, www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf, accessed April 15, 2022.

[25] City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 2375021027, 2375021028, and 2375021029, http://zimas.lacity.org/, accessed June 2, 2021.

conversion of farmland to non-agricultural use or forest land to non-forest use and no impact would occur.

Cumulative Impacts

No Impact. The geographic context for a cumulative impact analysis of agriculture resources is the County of Los Angeles, and the geographic context for the cumulative analysis of forest resources is CAL FIRE's 19.9-million acre South Coast area, which encompasses four national forests (Angeles, Cleveland, Los Padres, and San Bernardino) and other federal, state, and privately owned land. The Project and the related projects are located within a developed, urbanized area of the City of Los Angeles generally zoned for commercial and residential uses and do not support existing farming, agricultural, or forest-related operations. One of the related projects (Related Project No. 5) is located on a site that is zoned A1-1XL-RIO, which allows for agricultural uses. However, the site has operated as a golf and tennis club since 1956 and does has not supported agricultural uses. Therefore, development of the related projects together with the Project would not result in the conversion of State-designated agricultural land from an agricultural use to a non-agricultural use or result in the loss of forest land or the conversion of forest land to non-forest use. ***Therefore, the Project's contribution to cumulative impacts regarding agricultural resources would not be cumulatively considerable and no cumulative impacts would occur.***

III. AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Minimize land disturbance.

b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.

c) Cover trucks when hauling dirt.

d) Stabilize the surface of dirt piles if not removed immediately.

e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads

f) Minimize unnecessary vehicular and machinery activities.

g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.

h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.

i) On Caltrans projects, Caltrans Standard Specifications 10—Dust Control, 17—Watering, and 18—Dust Palliative shall be incorporated into project specifications.

j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily logging of the operating hours of the equipment should also be required.

k) Ensure that all construction equipment is properly tuned and maintained.

l) Minimize idling time to 5 minutes or beyond regulatory requirements—saves fuel and reduces emissions.

m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.

n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.

o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts.

p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.

q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to

Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible.

r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.

s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.

t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.

u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).

v) As applicable for airport projects, the following measures should be considered:

   a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines.

   b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.

   c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum.

w) As applicable for port projects, the following measures should be considered:

   a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE).

   b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.

c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power.

d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.

e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.

f. Encourage the participation in the Green Ship Incentives.

g. Offer incentives to encourage the use of on-dock rail.

x) As applicable for rail projects, the following measures should be considered:

a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.

y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.

a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.

b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.

c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents.

d. Provide information to residents on where MERV filters can be purchased.

e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.

f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.

g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.

h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and

i. Develop a process for evaluating the effectiveness of the enhanced filtration units.

aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities

bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:

- Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
- Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. diesel engines on site shall be Tier 2 or higher.
- Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.
- Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.
- Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less
- The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:
  i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.
  ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
  iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.
- The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
- The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator on-site, includes:
  i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.

ii. Any problems with the equipment or emission controls.

iii. Certified copies of fuel deliveries for the time period that identify:

1. Source of supply
2. Quantity of fuel
3. Quantity of fuel, including sulfur content (percent by weight)

cc) Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency:

– Install programmable thermostat timers

– Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24).

– Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.)

– Install higher efficacy public street and area lighting

– Limit outdoor lighting requirements

– Replace traffic lights with LED traffic lights

– Establish on-site renewable or carbon neutral energy systems—generic, solar power and wind power

– Utilize a combined heat and power system

– Establish methane recovery in Landfills and Wastewater Treatment Plants.

– Locate project near bike path/bike lane

– Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.

– Provide traffic calming measures, such as:

i. Marked crosswalks

ii. Count-down signal timers

iii. Curb extensions

iv. Speed tables

v. Raised crosswalks

vi. Raised intersections

vii. Median islands

viii. Tight corner radii

ix. Roundabouts or mini-circles

x. On-street parking

xi. Chicanes/chokers

– Create urban non-motorized zones

- Provide bike parking in non-residential and multi-unit residential projects
- Dedicate land for bike trails
- Limit parking supply through:
    i. Elimination (or reduction) of minimum parking requirements
    ii. Creation of maximum parking requirements
    iii. Provision of shared parking
- Require residential area parking permit.
- Provide ride-sharing programs
    i. Designate a certain percentage of parking spacing for ride sharing vehicles
    ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
    iii. Providing a web site or messaging board for coordinating rides
    iv. Permanent transportation management association membership and finding requirement.

Applicability to the Project

As analyzed under Air Quality Threshold (b) below, there is the potential for significant air quality impacts in connection with the Project's short-term regional construction emissions. Therefore, the Project would implement PMM AQ-1(q) from the 2020–2045 RTP/SCS PEIR MMRP, which requires Tier 4 Final equipment or better for all engines above 50 horsepower. This measure would address the significant air quality impact and ensure that impacts would be less than significant. The remainder of the measures included in PMM AQ-1 are not applicable to the Project, as existing regulatory measures that would apply to the Project, including those identified by the California Air Resources Board (CARB) and SCAG to facilitate consistency with applicable air quality plans, as discussed below, are equal to or more effective than the remaining measures of PMM AQ-1.

Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Basin and is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [O_3], particulate matter [PM_{10}], and fine particulate matter [$PM_{2.5}$]). SCAQMD's 2016 Air Quality Management Plan (2016 AQMP) is the regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by SCAG.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.[26] With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based in part on projections originating under County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2016 AQMP.

The 2016 AQMP was adopted by the SCAQMD as a program to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. It relies on emissions forecasts based on demographic and economic growth projections provided by SCAG's 2016–2040 RTP/SCS. SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies." Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and not to interfere with its attainment. The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

As described in detail in Part 3, Project Description, of this SCEA, the Project would include three buildings on an approximately 5.8-acre site. The Project would include new residential, restaurant, retail, and other commercial uses totaling 650,996 square feet. Specifically, the Project would provide 520 residential units, 18,019 square feet of restaurant uses, 27,926 square feet of retail uses, and 64,151 square feet of residential amenity and accessory space.

As discussed under Item XIV, Population and Housing, below, it is expected that the Project would increase population and number of jobs by 1,240 residents and 128 employees. This increase in population and employees would be well within the existing population and employment projections for the community and region and would be able to be accommodated by vacancies in the housing stock and new residential units currently being developed in the region. Furthermore, while the Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout, these would be short-term opportunities and are employment positions that circulate throughout the region based on the construction site. Therefore, because the Project would result in a minimal increase in population and permanent employment, it would be consistent with the demographic projections set forth in SCAG's 2016–2040 RTP/SCS and which were used in the 2016 AQMP. Thus, the Project would not conflict with or obstruct implementation of the 2016 AQMP.

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

[26] SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.

- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.

- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.

- **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

- **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

As described in Part 3, Project Description, of this SCEA, the Project would add residential and commercial uses resulting in increases in population and employees. The Project's location within an existing urban area would reduce per capita vehicle miles traveled (VMT) and related vehicle emissions in comparison to a project located in a non-urban environment as discussed further under Item XVII, Transportation, and in the Transportation Assessment included in Appendix L of this SCEA (which includes the VMT Calculator run for the Project).[27] High population density would result in employees potentially living closer to the Project Site, reducing travel distances and overall VMT. The Project's 520 residential units, including the 78 Very Low-Income affordable units, would provide the opportunity for area workers to live within close proximity to their place of employment. In addition, the Project includes short- and long-term bicycle parking spaces for the proposed uses, would be developed in an urban area within close proximity to residential uses, and would include on-site EV and EV-ready parking, thereby facilitating a reduction in VMT as discussed under Item XVII and the Transportation Assessment. The Project would also include primary entrances for pedestrians and bicyclists that would be safe and easily accessible. As part of the Project, additional bicycle racks (i.e., 44 short-term and 228 long-term) would be installed, thereby further promoting the use of an alternative mode of transportation.

As shown in Table 6 and Table 7 on pages 86 and 87, respectively, in the analysis below, Project implementation would not exceed California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$), the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP, and impacts would be less than significant.

[27] Gibson Transportation Consultants, Inc., Transportation Assessment for the Residences at Sportsmen's Lodge, Studio City, California, June 2021.

Table 6
Regional and Localized Unmitigated Construction Emissions[a]
(pounds per day)

Emission Type	VOC[b]	NO_X	CO	SO_X	PM_{10}[c]	$PM_{2.5}$[c]
Regional Emissions						
2023	8	149	78	0	32	13
2024	11	170	103	0	35	15
2025	23	126	106	<1	22	10
2026	24	125	122	<1	24	10
2027	4	31	42	<1	3	2
Maximum Regional Emissions	24	170	122	<1	35	15
Regional Construction Daily Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(51)**	**70**	**(428)**	**(150)**	**(115)**	**(40)**
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**
Localized Emissions						
2023	—	69	54	—	9	5
2024	—	88	74	—	10	6
2025	—	68	81	—	6	4
2026	—	76	91	—	6	4
2027	—	28	37	—	1	1
Maximum Localized Emissions	—	88	91	—	10	6
Localized Significance Threshold[d]	—	172	1434	—	14	8
Over/(Under) Threshold	—	**(84)**	**(1,343)**	—	**(4)**	**(2)**
Exceed Threshold?	—	**No**	**No**	—	**No**	**No**

[a] *Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix B of this SCEA. CalEEMod modeling outputs are also provided in Appendix B of this SCEA. Numbers may not add up exactly due to rounding.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEmod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *PM_{10} and $PM_{2.5}$ emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 7 (East San Fernando Valley)) for a 5-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located approximately 33 meters (110 feet north of the Project Sit)e. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

Source: Eyestone Environmental, November 2021; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.

Table 7
Project-Related Operational Emissions[a]
(pounds per day)

Emission Type/Source	VOC[b]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Operational Emissions						
Area	11	<1	43	<1	<1	<1
Energy (Natural Gas)	<1	2	<1	<1	<1	<1
Mobile	12	13	119	<1	32	9
Stationary (Emergency Generator)	<1	<1	<1	<1	<1	<1
Project Regional Emissions	**24**	**15**	**164**	**<1**	**32**	**9**
Regional Significance Threshold	55	55	550	150	150	55
Over/(Under)	**(31)**	**(40)**	**(386)**	**(150)**	**(118)**	**(46)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Localized Emissions[c]	—	3	44	—	<1	<1
Localized Significance Threshold[d]	—	**172**	**1,434**		**4**	**2**
Over/(Under) Threshold	**—**	**(169)**	**(1,390)**		**(4)**	**(2)**
Exceed Threshold?	**—**	**No**	**No**	**—**	**No**	**No**

Note: Numbers may not add up exactly due to rounding

[a] *Worksheets and modeling output files are provided in Appendix B of this SCEA.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEmod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *Localized emissions include area, energy and stationary sources.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 7 (East San Fernando Valley) for a 5-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located approximately 33 meters (110 feet) north of the Project Site. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

Source: Eyestone Environmental, August 2021; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including the monitoring stations nearest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The monitoring station most representative of the Project Site is the West Los Angeles–VA Hospital Station, located at Wilshire Boulevard and Sawtelle Boulevard in the City of Los Angeles, approximately 6 miles south of the Project Site. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would result in less than significant impacts relative to

the daily significance thresholds for criteria air pollutant emissions established within the SCAQMD CEQA Air Quality Handbook.[28]

Construction

Construction of the Project has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from site preparation, grading and construction activities. Mobile source emissions, primarily particulate matter and nitrogen oxides (NO_X), would result from the use of construction equipment such as loaders, graders, backhoes, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs; (2) 100 pounds per day for NO_X; (3) 550 pounds per day for carbon monoxide (CO); (4) 150 pounds per day for sulfur oxides (SO_X); (5) 150 pounds per day for PM_{10}; and (6) 55 pounds per day for $PM_{2.5}$.[29]

Construction activities would include site preparation, grading, paving, building construction, and architectural coatings. Construction would occur over approximately 43-month period (e.g., approximately late July 2023 through early February 2027). Construction would require approximately 431,140 cubic yards of total soil export. Details are provided in Appendix B of this SCEA.

Regional Impacts

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD recommended California Emissions Estimator Model (CalEEMod) Version 2020.4.0. Model results are provided in Appendix B of this SCEA. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of unmitigated maximum daily regional emissions for Project construction is presented in Table 6 on page 86, along with the regional significance thresholds for each air pollutant. As shown in Table 6, maximum unmitigated regional construction emissions would not exceed the SCAQMD regional significance thresholds for VOC, CO, SO_X, PM_{10}, or $PM_{2.5}$. Maximum unmitigated construction emissions would exceed the SCAQMD daily significance threshold for NO_X as a result of overlapping phases (i.e., combined construction activities of Phases 1, 2, and 3). As a result, regional construction emissions resulting from the Project would result in a significant short-term impact and mitigation measures would be required.

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[28] SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/ceqa/hdbk.html, accessed January 31, 2020.

[29] SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed April 15, 2022.

As discussed above, the 2020–2045 RTP/SCS PEIR MMRP contains mitigation measures that are to be implemented, as appropriate and feasible, if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to air quality. These include Mitigation Measure PMM AQ-1, listed in detail above, which identifies measures to reduce substantial adverse effects related to the violation of air quality standards. The Project would incorporate the following mitigation measure from the 2020–2045 RTP/SCS PEIR MMRP to address the short-term regional construction emissions impact:

> **RTP/SCS Mitigation Measure PMM AQ-1(q):** Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible (ZE/ZNE technologies are not necessary to mitigate construction air quality impacts associated with the Project and will not be included as part of Project mitigation).

With implementation of RTP/SCS Mitigation Measure PMM AQ-1(q), peak daily construction NO_x emissions would be reduced- from 170 pounds per day to 95 pounds per day. Therefore, regional construction emissions resulting from the Project would result in a less than significant impact.

Localized Impacts

The localized effects from on-site daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate lookup tables and Project-specific modeling, where appropriate.[30] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, or $PM_{2.5}$. SCAQMD does not provide an LST for SO_2 since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

[30] SCAQMD, LST Methodology Appendix C—Mass Rate LST Look-Up Table, October 2009, www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf, accessed April 14, 2022.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. For projects that exceed 5 acres, such as the Project, the 5-acre LST look-up values can be used as a screening tool to determine which pollutants require detailed analysis.[31] This approach is conservative as it assumes that all on-site emissions would occur within a 5-acre area and would over-predict potential localized impacts (i.e., more pollutant emissions occurring within a smaller area, resulting in greater concentrations). Although the Project Site is 5.8 acres, localized thresholds for a 5-acre site were used to evaluate localized impacts as smaller sites would have more stringent thresholds. If a project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling be performed.

Estimates of maximum construction-related localized (on-site) daily emissions for NO_X, CO, PM_{10}, or $PM_{2.5}$ are presented in Table 6 on page 86. Based on the construction site acreage and distance to the closest off-site sensitive receptors, localized construction emissions thresholds were obtained from the LST look-up tables and are also listed in Table 6. The nearest residential uses are residential uses located north of the Los Angeles River and north of the Project Site, approximately 110 feet to the north. A 25-meter (83 foot) receptor distance was used to evaluate impacts at these receptors.[32] As presented in Table 6, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO_X, CO, PM_{10}, or $PM_{2.5}$. Therefore, localized construction emissions resulting from the Project would result in less than significant short-term impacts, and no mitigation measures are required.

Operation

SCAQMD has established separate significance thresholds to evaluate potential impacts due to the incremental increase in criteria air pollutants associated with long-term operations. Regional operational emissions for the Project were calculated using CalEEMod. Inputs into the CalEEMod model include Project-related vehicle trips, as well as land uses and square footage to determine energy and water usage and waste generation. Mobile-source emissions were calculated within CalEEMod based on data from the trip generation and VMT analysis included in the Transportation Assessment, Appendix L of this SCEA. The VMT analysis is based on the LADOT VMT Calculator methodology and contains trip generation and daily VMT for the Project. In addition, the proposed land uses would result in an increase in emissions generated by energy sources (e.g., natural gas combustion) and area sources (e.g., landscape fuel combustion, consumer products, and architectural coatings.

Regional Impacts

The results of the modeled emissions calculations are provided in Table 7 on page 87, and CalEEMod model output files are provided in Appendix B of this SCEA. As indicated therein, the Project would result

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31 Telephone Conversation, Ian MacMillan, SCAQMD CEQA Program Supervisor, November 10, 2011.

32 SCAQMD LST thresholds are given at 25, 50, 100, 200 and 500-meter increments.

in an increase in criteria pollutant (VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$.) emissions which would fall below the SCAQMD daily significance thresholds for long-term regional emissions. Therefore, impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

Localized Impacts

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Localized emissions estimates for criteria air pollutants from on-site sources are presented in Table 7 on page 87. The SCAQMD LST mass rate look-up tables, which apply to projects that have active areas that are less than or equal to 5 acres in size, were used to evaluate potential localized impacts. As shown in Table 7, on-site localized operational emissions would not exceed any of the LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

Under existing conditions, CO levels in the Project area are substantially below the federal and state standards.[33] No exceedances of CO have been recorded at monitoring stations in the Basin for some time, and the Basin is currently designated as a CO attainment area for both the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). Air quality data from the SCAQMD Reseda monitoring station between years 2016–2018 indicate that the maximum CO levels in recent years are 3.4 ppm (1-hour average) and 2.5 ppm (8-hour average) compared to the thresholds of 20 ppm (1-hour average) and 9.0 ppm (8-hour average).[34]

Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project-impacted intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMP. As discussed below, this comparison provides evidence that the Project would not cause or contribute to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Basin. These included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.[35] This intersection is located near the on- and off-ramps to Interstate 405 in West Los

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33 SCAQMD, Historical Data by Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed September 1, 2021.

34 SCAQMD, "Historical Data by Year," www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed April 23, 2020. Reseda Monitoring Station.

35 SCAQMD, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24, www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf, accessed April 15, 2022.

Angeles. The evidence provided in Table 4-10 in Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 ppm (8-hour average) at Wilshire Boulevard and Veteran Avenue.[36] The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.[37] The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. Metro evaluated the level of service (LOS) in the vicinity of the Wilshire Boulevard and Veteran Avenue intersection and found it to be LOS E at peak morning traffic and LOS F at peak afternoon traffic.[38,39] As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot.

At buildout of the Project, the Project is projected to have a net increase of 3,540 daily trips as calculated by the City's VMT Calculator as discussed under Item XVII, Transportation, and in Appendix L, Transportation Assessment, of this SCEA. The addition of these trips to any of the nearest study intersections would not result in an average daily traffic volume anywhere near the volumes analyzed in the 2003 AQMP. Therefore, the Project does not trigger the need for CO hotspots modeling and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

Based on the above, with the incorporation of Mitigation Measures PMM AQ- 1(q) from the 2020–2045 RTP/SCS PEIR MMRP, outlined above, to address impacts related to regional construction emissions, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. Thus, as this mitigation measure would be incorporated into the Project prior to this analysis (pursuant to PRC Section 21081), impacts would be less than significant and no Project mitigation would be required.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. As discussed above, the nearest sensitive

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36 The 8-hour average is based on a 0.7 persistence factor, as recommended by SCAQMD.

37 Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

38 The Metropolitan Transportation Authority measured traffic volumes and calculated the LOS for the intersection of Wilshire Blvd./ Sepulveda Ave. which is a block west along Wilshire Blvd., still east of Interstate 405.

39 Metropolitan Transportation Authority. 2004. Congestion Management Program for Los Angeles County. Exhibit 2-6 and Appendix A, http://libraryarchives.metro.net/DPGTL/programs/congestion-management-program-lacmta/2004-congestion-management-program-for-los-angeles-county.pdf, accessed April 15, 2022.

receptor with respect to air quality are residential uses located approximately 130 feet north of the Project Site. Additional residential uses are located further away, approximately 240 feet south of the Project Site, as well as further west of the Project Site.

As discussed above, construction and operation of the Project would result in less than significant impacts relative to both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, impacts to off-site sensitive receptors would be less than significant, and no mitigation measures are required.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005). Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses. The Project would not include any sources of TACs such as generators, boilers or any other combustion sources. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The SCAQMD recommends Health Risk Assessments (HRAs) for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such facilities are located in proximity to the Project Site, and the Project does not propose any such uses. As such, a HRA was not required for the Project.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses as it would include residential, retail, and restaurant uses. On-site trash receptacles would be contained, located,

and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations. In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Based on the above, construction and operation of the Project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people, and impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.

b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts v. Habitat restoration vi. Establishment of conservation easements vii. Permanent dedication of in-kind habitat.

c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.

d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.

e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.

f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.

g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.

h) Appoint a qualified biologist to monitor implementation of mitigation measures.

i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring,

nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.

j) Develop an invasive species control plan associated with project construction.

k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.

l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.

m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.

n) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings.

o) Project sponsors shall consider the impacts of nitrogen deposition on sensitive species

Applicability to the Project

As discussed below, adherence to regulatory compliance measures included in the Migratory Bird Treaty Act and California Fish and Wildlife Code, which are equal to or more effective than the relevant measures under PMM BIO-1, would ensure that the Project would not have a substantial adverse effect on species covered under these regulations. However, the Project would incorporate relevant measures from SCAG Mitigation Measure PMM BIO-1, which would be applicable to protected species that are not covered under existing regulatory measures (e.g., bats). Specifically, the Project would incorporate PMM BIO-1(g) and PMM BIO-1(i) from the 2020–2045 RTP/SCS PEIR, which would address potential impacts and ensure that they would be less than significant levels. The remainder of the measures included in PMM BIO-1 are not applicable to the Project, as existing regulatory measures that would apply to the Project, as outlined below, are equal to or more effective than the remaining measures of PMM BIO-1.

PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.

b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four

national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.

c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.

d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.

e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.

f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.

g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.

h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.

i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.

j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.

k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.

l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.

m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.

n) Install fencing and/or mark sensitive habitat to be avoided during construction activities.

o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist.

p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist

q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).

r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

Applicability to the Project

As discussed below, no riparian or other sensitive natural community exists on the Project Site or in the surrounding area. Therefore, Mitigation Measure PMM BIO-2 is not applicable to the Project.

PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.

a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.

b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.

c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:

- Permittee-responsible mitigation
- Contribution of in-kind in-lieu fees
- Use of in-kind mitigation bank credits
- Where avoidance is determined to be infeasible and

d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:

- Avoidance
- Impact Minimization On-site alternatives
- On-site alternatives
- Off-site alternatives

e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.

Applicability to the Project

As analyzed below, no water bodies or state and federally protected wetlands exist on the Project Site. Adherence to regulatory requirements, including the incorporation of BMPs during construction and operation; compliance with City grading permit regulations; and implementation of Project Design Features, would ensure that construction and operation of the Project would not result in the removal, filling, or other means of hydrological interruption of the Los Angeles River. These measures are equal to or more effective than the measures included in PMM BIO-3, or, in the case of the Project Design Features, include measures that address site-specific conditions. Therefore, the measures included in Mitigation Measure PMM BIO-3 are not applicable to the Project.

PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.

b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.

c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.

d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.

e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.

f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.

g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.

h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.

i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.

j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.

k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore off-site habitat).

l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.

m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.

n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.

o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:

   – Wildlife movement buffer zones
   – Corridor realignment
   – Appropriately spaced breaks in center barriers
   – Stream rerouting
   – Culverts

- Creation of artificial movement corridors such as freeway under or overpasses
- Other comparable measures

p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.

q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.

r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats.

s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to:

- Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.
- Design exterior lighting to confine illumination to the project site
- Provide structural and/or vegetative screening from light-sensitive uses.
- Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
- Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.

t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:

- Install temporary noise barriers during construction.
- Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment,

whenever such procedures are available and consistent with construction procedures.

- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.
- Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
- Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.

u) Require large buffers between sensitive uses and freeways.

v) Create corridor redundancy to help retain functional connectivity and resilience.

Applicability to the Project

The Project would incorporate Conditions of Approval that are in compliance with the Migratory Bird Treaty Act and California Fish and Game Code, which would ensure that the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. These regulatory compliance measures are equal to or more effective than relevant measures under PMM BIO-4. Thus, PMM BIO-4 is not applicable to the Project.

PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.

b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.

c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.

d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.

e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.

f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.

g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.

h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources

i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:

   – Avoidance strategies

   – Contribution of in-lieu fees

– Planting of replacement trees
– Re-landscaping areas with native vegetation post-construction
– Other comparable measures developed in consultation with local agency and certified arborist.

Applicability to the Project

The Project proposed a site-specific mitigation measure (BIO-MM-1) that incorporates aspects of PMM BIO-5, but that specifically address the potential for Project construction to impact the adjacent protected oak tree. The Project would also adhere to the City's Protected Tree and Shrub Relocation and Replacement Ordinance, street tree removal permit requirements, and Urban Forestry policies regarding the removal and replacement of the existing non-protected trees and shrubs. These site-specific mitigation measures and regulatory compliance measures are more effective than PMM BIO-5. Thus, PMM BIO-5 is not applicable to the Project.

PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs.

b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP.

c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.

Applicability to the Project

No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, PMM BIO-6 is not applicable to the Project.

Impact Analysis

The analysis of potential impacts associated with biological resources is based in part on the Los Angeles River Impact Analysis Memorandum (River Memo) prepared GPA Consulting and dated April 1, 2021, and the Protected Tree Report and Addendum (Tree Report and Addendum) prepared by Jan C. Scow Consulting Arborists and dated January 20, 2021, and March 18, 2021, respectively. These reports are included in Appendix C of this SCEA.

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with the Sportsmen's Lodge Hotel, associated facilities, and surface parking. Landscaping within the Project Site consists of ornamental landscaping and hardscape features, including a variety of trees, shrubs, and other plantings. As provided in the Tree Report and Addendum prepared by Jan C. Scow Consulting Arborists, included in Appendix C of this SCEA, there are 96 trees located on or near the Project Site, including 88 on-site trees, seven street trees, and one off-site protected coast live oak. The Project would remove all of the existing on-site landscaping, including the non-native/non-protected trees on the Project Site, and four of the street trees along Ventura Boulevard. The Project would incorporate extensive landscaping on the Project Site that would include approximately 135 trees, as well as a mix of shrubs and groundcover. Additionally, street trees would be replaced at a 1:1 ratio in accordance with the Los Angeles Bureau of Street Services, Urban Forestry Division.

Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. However, birds protected by the Migratory Bird Treaty Act may nest within the trees that would be removed as part of the Project.

The Migratory Bird Treaty Act prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In accordance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project Applicant would be required to conduct tree removal activities associated with the Project outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. These measures to be implemented by the Project in compliance with the Migratory Bird Treaty Act and the California Fish and Game Code would be incorporated into the Project as Conditions of Approval, as follows:

- The Project Applicant/contractor would conduct all demolition, construction, ground disturbance, and vegetation clearing activities, including removal of the existing trees, outside of the avian breeding and nesting season (February 1–August 31) to the extent feasible.

- If removal of the existing trees on and adjacent to the Project Site must occur during the nesting season, a qualified biologist is required to be present during the removal activities to ensure no active bird nests (those containing eggs or nestlings, or with juvenile birds still dependent on the nest) are impacted. The biologist must determine whether active nests are present within the trees before any actual removal activity takes place.

- If any active nests are present within the trees during demolition, construction, ground disturbance, and vegetation clearing activities, the nests shall be avoided until determined by

the biologist to no longer be active. The biologist shall determine appropriate avoidance buffers for any active nest based on species, nest location, and types of disturbance proposed in the vicinity of the nest.

In addition to species covered under the Migratory Brid Treaty Act and the California Fish and Game Code, construction activities, including ground disturbance, vegetation removal, and increased noise and light levels, could have direct and/or indirect impacts on small terrestrial and avian species typically found in developed settings, such as bats, which sometimes use trees and man-made structures for roosting. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment. Specifically, Title 14, Section 251.1 of the California Code of Regulations, prohibits harassment (defined in that section as an intentional act that disrupts an animal's normal behavior patterns, including breeding, feeding, or sheltering) of nongame mammals, and California Fish and Game Code Section 4150, prohibits "take" or possession of all nongame mammals or parts thereof. Any activities resulting in bat mortality, such as the destruction of an occupied bat roost that results in the death of bats; or disturbance that causes the loss of a maternity colony of bats, which may also result in the death of young bats; or various modes of nonlethal pursuit or capture may be considered "take" as defined in Section 86 of the California Fish and Game Code. While none have been identified on the Project Site, it is possible that bats or bat roosts are present in on-site trees or in building cavities. Thus, construction activities could have a significant impact on bats, which are a protected species.

As discussed above, the 2020–2045 RTP/SCS PEIR MMRP contains mitigation measures that are to be implemented, as appropriate and feasible, if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include Mitigation Measure PMM BIO-1, listed in detail above, which identifies measures to reduce substantial adverse effects related to threatened and endangered species and other special status species. Adherence to regulatory compliance measures included in the Migratory Bird Treaty Act and California Fish and Wildlife Code, which are equal to or more effective than the relevant measures under PMM BIO-1, would ensure that the Project would not have a substantial adverse effect on species covered under these regulations. However, the Project would incorporate the following mitigation measures from the 2020–2045 RTP/SCS PEIR MMRP to address protected species that are not covered under existing regulatory measures:

RTP/SCS Mitigation Measure PMM BIO-1(g): Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.

RTP/SCS Mitigation Measure PMM BIO-1(i): Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.

Compliance with the Migratory Bird Treaty Act and California Fish and Game Code, as well as adherence to RTP/SCS Mitigation Measures* PMM BIO-1(g) and PMM BIO-1(i) *from the 2020–2045 RTP/SCS PEIR MMRP outlined above, would ensure that the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Thus, , impacts would be less than significant.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with the Sportsmen's Lodge Hotel, associated facilities, and surface parking. The Project Site is surrounded by a mix of low- to mid-rise commercial, residential, office, and open space uses, with the Los Angeles River located directly adjacent to the Project Site on the north. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.[40,41] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.[42,43] In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.[44,45,46]

As noted above, potential impacts of the Project to the Los Angeles River were analyzed in the River Memo included in Appendix C of this SCEA. As analyzed therein and consistent with above, no wetland or riparian habitat were observed along the banks of the Los Angeles River adjacent to the Project Site. The Project would not directly impact the Los Angeles River. Furthermore, construction equipment staging areas would be located at least 50 feet from the River and construction vehicles and equipment would be checked daily for signs of fluid and fuel leaks, as outlined in BIO-PDF-1, below. Thus, potential indirect impacts would be avoided, as discussed in more detail under Biological Resources Threshold (c), below.

Overall, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service and impacts would be less than significant.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

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40 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS) https://apps.wildlife.ca.gov/bios/, accessed January 4, 2021.

41 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed January 4, 2021.

42 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-3., https://planning.lacity.org/odocument/6aa45676-e431-43ab-8621-dd493e64d2ea/FrameworkFEIR.pdf, accessed April 15, 2022.

43 Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015, https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf, accessed April 15, 2022.

44 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS) https://apps.wildlife.ca.gov/bios/, accessed January 4, 2021.

45 California Department of Fish and Wildlife, CDFW Lands, www.wildlife.ca.gov/Lands, accessed January 4, 2021.

46 U.S. Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed January 4, 2021.

Less Than Significant Impact. As discussed above, the Project Site is located in an urbanized area and is currently developed with the Sportsmen's Lodge Hotel, associated facilities, and surface parking. No water bodies or state and federally protected wetlands exist on the Project Site.[47] However, the Los Angeles River is located adjacent to the northern boundary of the Project Site, which is classified by the U.S. Fish and Wildlife Service as a Riverine System.[48] As discussed in the River Memo included in Appendix C of this SCEA, the Los Angeles River is considered non-wetland waters under the jurisdiction of the United States Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and CDFW. In addition, no wetland or riparian habitat was observed along the River's banks during the field survey.

Construction of the Project would not result in the removal, filling, or other means of hydrological interruption of the River. Specifically, construction activities would occur within the boundaries of the Project Site and would be separated from the River by the existing Los Angeles River Path. However, during grading and construction of the Project, there is potential for construction dust, debris, and materials to enter into the River. As discussed further below under Item X, Hydrology and Water Quality, in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) that would set forth Best Management Practices (BMPs) to be used during construction for stormwater and non-stormwater discharges. As outlined in the River Memo, BMPs such as silt fencing, fiber rolls, straw bales, or other measures, would be effective to minimize dust, dirt, and construction debris from entering the River and/or leaving the construction area. In addition, appropriate hazardous material BMPs would be implemented to reduce the potential for chemical spills or containment releases into the River, including any non-stormwater discharge. Such BMPs may include dust suppression using water or other techniques; storm drain inlet filter or rock bags; and designating separate collection areas for hazardous waste, construction waste, and domestic waste.

In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Additionally, as discussed in the River Memo prepared for the Project, which is included in Appendix C of this SCEA, site-specific features, as outlined in Project Design Feature BIO-PDF-1, would be adhered to during construction of the Project to ensure that impacts on jurisdictional waters within the Los Angeles River would be avoided and/or minimized.

Furthermore, during operation, the Project would comply with the City's LID Ordinance, which requires that post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements.

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[47] United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed January 4, 2021.

[48] According to the U.S. Fish and Wildlife Service Wetlands Mapper, the Riverine System includes all wetlands and deepwater habitats contained within a channel, www.fws.gov/wetlands/data/Mapper.html, accessed January 4, 2021.

Project Design Features

The Project would implement the following Project Design Feature related to biological resources:

BIO-PDF-1: In order to avoid and/or minimize impacts on jurisdictional waters within the Los Angeles River during construction of the Project, the following measures would be implemented:

- Construction work areas in the northern portion of the Project Site would be maintained in a compact nature such that work areas would have minimal interface with the Los Angeles River, and staging areas for equipment refueling and maintenance would be located 50 feet from jurisdictional features.
- Construction vehicle and equipment would be checked daily for signs of fluid and fuel leaks. Should evidence of leaks be discovered, drop pans would be placed under the potentially leaking vehicles and/or equipment when parked and not in operation.

Overall, with adherence to regulatory requirements, including the incorporation of BMPs during construction and operation; compliance with City grading permit regulations; and implementation of Project Design Features, construction and operation of the Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, and impacts would be less than significant.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. As discussed above, the Project Site is located in an urbanized area and is developed with the Sportsmen's Lodge Hotel, associated facilities, and surface parking. In addition, the areas surrounding the Project Site are fully developed or undergoing construction, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[49,50]

As discussed in the Tree Report and Addendum included in Appendix C of this SCEA, there are a total of 96 trees on or near the Project Site, including 88 on-site trees, seven street trees, and one off-property protected coast live oak (*Quercus agrifolia*) tree. The Project would remove four street trees (three *Washingtonia robusta* trees and one *Pistacia chinensis* tree) for a required loading zone on Ventura

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[49] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-4, https://planning.lacity.org/odocument/6aa45676-e431-43ab-8621-dd493e64d2ea/FrameworkFEIR.pdf, accessed April 15, 2022.

[50] Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015, https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf, accessed April 15, 2022.

Boulevard. New trees would be planted in place in accordance with the City's requirements, as discussed in more detail below.

Although unlikely, the existing trees to be removed could potentially provide nesting sites for migratory birds. The Project would be required to comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the California Fish and Game Code and California Department of Fish and Wildlife has never promulgated any regulations interpreting these provisions.

As discussed above, to ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent required by applicable law. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgment of the monitoring biologist, in coordination with the California Department of Fish and Wildlife. These measures would be implemented in compliance with the Migratory Bird Treaty Act and the California Fish and Game Code and would be incorporated into the Project as Conditions of Approval, as outlined under Biological Resources, Threshold (a), above. ***Adherence to these Conditions of Approval would ensure that the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant.***

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant With Mitigation Incorporated. The City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873, updated February 4, 2021) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California bay trees, Mexican elderberry shrubs, and toyon shrubs, of at least 4 inches in diameter at 4.5 feet above the ground level at the base of the tree or shrub. These tree and shrub species are defined as "protected" by the City of Los Angeles. Trees and shrubs that have been planted as part of a tree planting program are exempt from the City's Protected Tree and Shrub Relocation and Replacement Ordinance and are not considered protected. The City's Protected Tree and Shrub Relocation and Replacement Ordinance prohibits, without a permit, the removal of any regulated protected tree or shrub, including "acts which inflict damage upon root systems or other parts of the tree or shrub…" The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be

replaced by other protected shrub varieties and shall not be replaced by trees, as determined by the Board of Public Works, or a licensed or certified arborist.

As previously discussed, the Project would remove all of the landscaping on the Project Site, including the 88 on-site trees. In addition, four existing street trees along Ventura Boulevard would be removed for the pedestrian loading zone. Based on the Tree Report and Addendum included in Appendix C of this SCEA, the Project would not involve the removal of any trees or shrubs considered protected under the City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance either within the Project Site or in the adjacent right-of-way (street trees). The Project would include extensive landscaping, including a variety of trees that would be located throughout the Project Site, in accordance with the City of Los Angeles Landscape Ordinance 170,978 and the landscape regulations applicable to properties within the RIO District. In addition, the street trees that would be removed would be replaced at a 1:1 ratio in accordance with Department of City Planning policy and in coordination with the Los Angeles Bureau of Street Services—Urban Forestry Division.

In addition to the non-protected on-site trees and street trees, there is one protected tree, a coast live oak (Quercus agrifolia) tree, located off-site adjacent to the northeast corner of the Project Site (identified as Tree OP130 in the Tree Report). Although this tree is not located on the Project Site, there is potential for construction activities (e.g., demolition and excavation) and Project landscaping to impact the tree.

Mitigation Measures

The Project would implement the following mitigation measures to address the potential for Project construction activities to result in impacts to the off-site protected tree located adjacent to the Project Site:

BIO-MM-1: Prior to commencement of construction activities, the Project Applicant shall designate a Project Arborist. The Project Arborist shall review the final design of the Project and shall be notified at least 96 hours before: (a) clearing and grading of the Project Site; (b) digging, excavation, trancing, or building with the canopy of the dripline of the protected tree located adjacent to the Project Site on the northeast (Tree OP130); (c) pruning of Tree OP130's canopy or roots; and (d) commencement of any other activity within the canopy dripline of Tree OP130. The Project Arborist will also be on-site for construction monitoring and Project milestones, as follows:

Protective Fencing: Prior to the commencement of construction activities, the Project Applicant shall ensure that Tree OP130 is properly protected by fencing that shall remain in place throughout demolition activities. Upon completion of demolition activities, new protective fencing shall be installed 15 feet from the trunk of Tree OP130. Protective fencing shall also be placed around the street trees along Ventura Boulevard that will be retained. Protective fencing shall remain in place until Project construction is complete. The Project Arborist shall inspect all protective fencing upon installation.

Fencing around Tree OP130 shall be chain-link and a minimum of 5 feet high, held in place by steel stakes driven directly into the ground. Gates shall be installed, as required for operational access, but shall not be utilized for construction activities. No workers shall enter the fenced protection zones. No debris or equipment storage, waste disposal, equipment cleanout, outhouse, or vehicle parking shall be allowed within the fenced areas.

Demolition: The existing surface parking area located adjacent to the Los Angeles River should be demolished in a backwards direction within 15 feet of the trunk of Tree OP130. Demolition will take place from on top of the parking area, and demolition debris will be pulled away from the tree and onto the remaining parking area. No debris will be allowed to fall within 15 feet of Tree OP130, and all demolition equipment and personnel should be kept out of the 15-foot protection zone around the tree.

Exploratory Trenching: In the event that excavation must happen within 15 feet of the trunk of Tree OP130, an exploratory trench shall be dug along the proposed limit of excavation within 15 feet of the trunk of Tree OP130. The trench shall be as deep as the required excavation and as wide as necessary (away from the tree) to accommodate digging. The exploratory trench shall be dug using hand tools or an AirSpade only, and any roots less than 2 inches in diameter shall be cut cleanly using a sharp saw or pruning tool. No roots 2 inches or larger in diameter shall be cut during digging. The Project Arborist shall inspect the exploratory trench and provide mitigation recommendations accordingly.

Excavation: If roots 2 inches or greater in diameter are encountered during excavation near Tree OP130, cuts shall be made cleanly with a sharp saw or pruning tool, far enough behind any damage that all split and cracked root portions are removed. The cut will be made at right angles to the root so that the wound is no larger than necessary. When practical, roots will be cut back to a branching lateral root. Pruning wound treatment will not be applied to cuts.

Clearance Pruning: The Project Arborist shall be consulted prior to clearance pruning of Tree OP130. All pruning will be carried out by an ISA Certified Arborist, or under the oversight of the Project Arborist. All pruning shall conform to ANSI A-300 standards at a minimum.

Landscaping: When designing and installing landscape, irrigation, and hardscape around Tree OP130, the following measures shall be followed:

- No planting of any type, irrigation, or irrigation overspray shall occur within 10 feet of Tree OP130;
- Only drought tolerant or native plants shall be planted within 20 feet of the trunk of Tree OP130;
- No lawn or groundcover requiring frequent irrigation shall be planted within the canopy dripline of Tree OP130;
- Three (3) to 4 inches of organic mulch (freshly chipped tree trimmings) should be maintained within 20 feet of Tree OP130, wherever possible;
- Underground irrigation lines should be kept out of the canopy dripline of Tree OP130 to the extent possible and should be installed (when they are necessary within the dripline) without doing any root damage to the tree. Irrigation trenching within the canopy dripline of Tree OP130 shall be done using hand tools only.

With the incorporation of Project mitigation measures, as well as adherence to the City's Protected Tree and Shrub Relocation and Replacement Ordinance, street tree removal permit requirements, and Urban Forestry policies regarding the removal and replacement of the existing non-protected trees and shrubs, the Project would not conflict with any local policies or

ordinances protecting biological resources. Impacts would be less than significant with incorporation of mitigation measures.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is located in an urbanized area and is currently developed with the Sportsmen's Lodge Hotel, associated facilities, and surface parking. As previously described, the Project Site does not support any known habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[51] ***Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.***

Cumulative Impacts

Less Than Significant Impact. Cumulative impacts associated with biological resources are generally a consequence of aggregate past, present, and foreseeable impacts of the Project and other projects located within the vicinity of the Project Site. Thus, the cumulative analysis in this SCEA takes into consideration the five related projects within 0.75 mile of the Project Site, as identified in Table 35 on page 329 and shown in Figure 16 on page 330 in the analysis further below. Neither the Project Site nor any of the related projects are located on designated open space, conservation land, wildlife habitat, or riparian or wetland areas, and therefore no cumulative impacts associated with these designated areas would occur. As discussed above, the Project Site does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and would not contribute related cumulative impacts. In addition, the Project and the related projects would comply with applicable regulatory requirements regarding biological resources and protected species, including the Migratory Bird Treaty Act, California Fish and Game Code, and the City's regulations regarding protected trees and the removal of street trees. ***As such, no cumulative impacts regarding biological resources would occur.***

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐

[51] California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed April 15, 2022.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.

b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.

c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:

– Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.

– Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.

d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to

ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.

e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.

f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.

g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.

h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.

i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs.

Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS

k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.

l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

Applicability to the Project

Consistent with PMM CULT-1(a), a record search was conducted to determine if the Project area has been previously surveyed and whether historical resources were identified. In addition, consistent with PMM CULT-1(b), a Historic Resources Assessment of the Project Site and surrounding properties was prepared by Architectural Resources Group (July 2021), which is included in Appendix D of this SCEA. As described below, the Historic Resources Assessment concluded that no significant impacts to historic resources would occur as a result of the Project. In addition, consistent with Mitigation Measure PMM CULT-1(f), a CHRIS record search was conducted through the SCCIC, which did not identify any archaeological resources. Because no resources have been identified, no specific avoidance measures are warranted. Nevertheless, the Project would adhere to all applicable regulations regarding the

inadvertent discovery of archaeological resources. Thus, overall, the measures outlined in Mitigation Measure PMM CULT-1 are not applicable to the Project.

PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.

b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional:

– Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available.

– If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.

Applicability to the Project

PMM CULT-2 is not incorporated into the Project, as the City of Los Angeles's standard mitigation measures that address the potential for the accidental discovery of a tribal cultural resource during construction of the proposed Project would be applied, as outlined under Item XVIII, Tribal Cultural Resources, below. These Mitigation Measures (TCR-MM-1 through TCR-MM-3) are equal to or more effective than the measures included in PMM CULT-2. Thus, the SCAG's Mitigation Measure PMM CULT-2 is not applicable to the Project.

Impact Analysis

The analysis of potential impacts to historic and archaeological resources is largely based on the Sportsmen's Lodge Hotel Historical Resources Assessment Report (Historic Resources Assessment), prepared by Architectural Resources Group, dated July 14, 2021, and the Tribal Cultural Resources Assessment (TCR Report) prepared by SWCA Environmental Consultants, dated August 2021, which are included in Appendix D and Appendix M, respectively, of this SCEA.

A. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Less Than Significant Impact. Under CEQA, the evaluation of impacts to historic resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources and, if so, (2) a determination of whether the proposed project will result in a "substantial adverse change" in the significance of the resource or resources. A "substantial adverse change" in the significance of a historical resource is an alteration that materially impairs the physical characteristics that convey its historical significance and justify its eligibility.

On-Site Resources (Direct Impacts)

Existing structures on the Project Site consist of a five-story hotel building (the Sportsmen's Lodge Hotel) and associated facilities. The hotel was associated with the adjacent Sportsmen's Lodge Event Center (Event Center), an events venue and banquet facility that was located on the parcel immediately to the west of the Project Site. The hotel shared a common name and program with the Event Center, and together, the hotel and Event Center made up a complex that included lodging, dining, recreational facilities, and event facilities. The hotel has undergone a series of renovations and remodels, including one in 1976 during which the hotel's Spanish-inspired motif was replaced with a Country-English design. Additionally, the lakes and ponds that were historically part of the complex were infilled. In 2013, the entire Sportsmen's Lodge complex—including the Event Center and hotel—was identified through SurveyLA as a potential historic district, eligible against federal, state, and local criteria. While the evaluation did not explicitly identify the hotel as a contributing feature of the potential district, the hotel building was included within the boundary identified by SurveyLA and is noted in the significance statement. SurveyLA found the potential historic district to be potentially significant within the context of institutional development and within the context of entertainment and was identified as potentially eligible for listing in the National Register, the California Register, and as a Los Angeles Historic-Cultural Monument (HCM). In 2014, the Event Center was independently evaluated without the hotel for historical significance by the firm PCR Services (now known as ESA) as a part of a separate project approved as Case No. DIR-2014-886-SPP-SPPA-2A-M1 and it was concluded that the Event Center was ineligible for federal, state, and/or local listing because of a loss of integrity. The Event Center was demolished in 2019 in connection with the Shops at Sportsmen's Lodge project that was CEQA cleared by adopted Mitigated Negative Declaration (MND) No. ENV-2014-887-MND, and therefore, the physical and associative links between the side-by-side properties have been diminished.

As determined in the Project's Historic Resources Assessment included in Appendix D of this SCEA, the findings of which were accepted by the Los Angeles Department of City Planning Office of Historic Resources (OHR), the Sportsmen's Lodge Hotel does not meet eligibility criteria for listing in the National

Register, the California Register, or as a Los Angeles Historic-Cultural Monument (HCM).[52] The history of the hotel was linked to its association with the Sportsmen's Lodge Event Center, which was demolished and has been redeveloped with The Shops Development. The hotel does not directly signify important trends in the development of the San Fernando Valley or Studio City in a way that is not expressed in the many other commercial buildings that were constructed in the area during the same time period. Thus, the hotel is not associated with events that have made a significant contribution to the broad patterns of history (National Register Criterion A / California Register Criterion 1 / Local (HCM) Criterion 1). In addition, there is insufficient evidence that demonstrates that the hotel has a direct association with the productive period of any individuals who made significant contributions to history (National Register Criterion B / California Register Criterion 2 / Local (HCM) Criterion 2). Furthermore, while the hotel is designed in the mid-century modern style and exhibits characteristics that are commonly associated with the style as applied to the context of commercial architecture, it does not represent distinctive or innovative construction methods and does not stand out as a particularly significant example of the mid-century modern style or as a post-war hotel. Thus, the hotel does not appear to be significant for reasons related to its architecture or physical design (National Register Criterion C and California Register Criterion 3). With regard to integrity, a property must first meet one or more eligibility criteria (referenced above) and also retain sufficient integrity to convey its historic significance. Thus, as the hotel is not eligible pursuant to any of the federal, state, or local criteria, an assessment of integrity is not warranted. Therefore, based on the above and as analyzed in the Project's Historic Resources Assessment, the hotel is not a historical resource pursuant to CEQA. As such, there are no historical resources on the Project Site and the Project would not directly result in a substantial adverse change in the significance of an on-site historical resource.

Off-Site Resources (Indirect Impacts)

As previously mentioned, in 2014, the adjacent Event Center was independently evaluated for historical significance and was concluded to be ineligible for federal, state, and/or local listing. The City of Los Angeles adopted Mitigated Negative Declaration No. ENV-2014-887-MND in connection with approval of the Shops at Sportsmen's Lodge project, which authorized demolition of the Event Center. As such, the Event Center is not a historical resource and the Project would have no impact. Demolition of the Event Center commenced in September 2019 to accommodate The Shops Development.

With regard to other potentially historical resources in the Project vicinity, SurveyLA identified 14 potential historic resources within a 0.5-mile radius of the Project Site. Of these, three are within the viewshed of the Project Site and are analyzed herein. In addition, there is one designated HCM within a 0.5 mile radius of the Project Site. This HCM, Saint Saviour's Chapel (HCM No. 32), is located on the campus of Harvard-Westlake School at 3700-3976 Coldwater Canyon Avenue and is not within the viewshed of the Project Site. The three potential historical resources are as follows:

- Fletcher Silversmiths: Located at 12744 Ventura Boulevard this property was identified in SurveyLA as a rare example of early development along Ventura Boulevard in Studio City, and one of few extant examples of development along Ventura Boulevard in the 1920s. SurveyLA found the property to be individually eligible for listing in the National Register, California Register, and as a Los Angeles HCM.

[52] Written correspondence from Shannon Ryan, Senior City Planner, Office of Historic Resources, November 5, 2020. Please see Appendix D of this SCEA.

- Hughes Market/Ralphs Fresh Fare: Located at 12842 Ventura Boulevard, this property was identified in SurveyLA as an excellent example of Late Modern architecture in Studio City. SurveyLA found the property to be eligible for listing in the California Register and as a Los Angeles HCM.

- Denny's/Twain's: Located at 12907 Ventura Boulevard, this property was identified in SurveyLA as an excellent example of Googie-style coffee shop architecture in Sherman Oaks based on a prototype developed by architects Armet and Davis, and includes a rotating roof sign in addition to the building.

The Project is confined to the boundaries of the Project Site is physically separate from these properties. Furthermore, while the Project would introduce a new visual element to the Project area, it would not affect the setting of any potentially historical resources, as the primary public views of these resources would remain unchanged by the Project. There are no important views of or to any of these potential resources that would be blocked or compromised by the Project. Furthermore, while the Project would introduce new massing on the north side of Ventura Boulevard, it would not change the general character of the streetscape, which consists of an eclectic mix of commercial properties that vary in age, size, scale, massing, and setback. Therefore, the Project would not result in indirect impacts to off-site historical resources.

Overall, the Project would not cause a substantial adverse change in the significance of a historical resource (on-site or off-site) pursuant to CEQA Guidelines Section 15064.5, and impacts would be less than significant.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. The Project Site is located in an urbanized area and has been previously disturbed in conjunction with previous and existing improvements on the Project Site. As noted in the Geotechnical Investigation prepared by Geocon West, Inc. (September 2020), included in Appendix F of this SCEA, fill soils up to about approximately four feet thick are present over most of the Project Site, indicating prior Project Site grading activities. Therefore, the topmost layers of soil on the Project Site are not likely to contain substantive archaeological resources. In addition, as part of the TCR Report prepared for the Project and included as Appendix M of this SCEA, a California Historical Resources Information System (CHRIS) records search was conducted on June 4, 2021, through the South Central Coastal Information Center (SCCIC) located at the California State University, Fullerton. The results of the record search indicate that a total of six cultural resource studies have been conducted within a 0.5-mile radius of the Project Site, two of which were conducted within the boundaries of the Project Site (CHRIS report LA-12315 and CHRIS report LA-13417). As discussed in the TCR Report, no archaeological resources were identified during the CHRIS record search. In addition, the Buried Site Assessment conducted as part of the TCR Report, which considered archaeological, ethnographic, historical, environmental, and other archival data sources in conjunction with the physical setting of the Project Site, found that the sensitivity for archaeological resources at the Project Site is considered low.[53] Thus, the likelihood that intact archaeological resources are present on the Project Site is low.

[53] While the Buried Site Assessment specifically addressed the potential for tribal cultural resources to be located within the Project Site, and not all tribal cultural resources are archaeological resources, the tribal cultural resources that are likely to be preserved below the surface are also likely to fit the definition of an archaeological resource under CEQA.

Notwithstanding, construction of the Project would include a three-level subterranean parking garage that would require excavation to previously undisturbed depths up to 52 feet below the surface to accommodate construction of the subterranean parking structure. Therefore, it is possible that archaeological resources that were not identified during prior construction or other human activity may be present. The Project would adhere to all applicable regulations regarding the inadvertent discovery of archaeological resources, which require the temporary halting of construction activities near the encounter and retaining a qualified archaeologist to assess the find. Thus, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. Therefore, with the implementation of all applicable regulatory requirements, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5, and, as such, any potential impacts related to archaeological resources would be less than significant.

With adherence to all applicable regulatory requirements regarding archaeological resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5. Impacts would be less than significant.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. As discussed above, the Project Site has been subject to previous grading and development. No known traditional burial sites have been identified on-site. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98. In addition, as outlined under Item XVII, Tribal Cultural Resources, if the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the Native American Heritage Commission (NAHC) within 24 hours (Section 7050.5(c)) and adhere to the City's standard mitigation measures, as outlined under Item XVII, Tribal Cultural Resources.

With the implementation of regulatory requirements, potential impacts associated with the disturbance of human remains, including those interred outside of dedicated cemeteries, would be less than significant. Also refer to Item XVII, Tribal Cultural Resources.

Cumulative Impacts

Less Than Significant Impact. With regard to historic resources, although impacts tend to be site-specific, cumulative impacts could occur if the Project and related projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project. As shown in Figure 16 on page 330 in the analysis below, the nearest related project to the Project Site is Related Project No. 4, which is the fully constructed and occupied Shops Development located adjacent to the west of the Project Site. The remaining related projects are located at more substantial distances from the Project Site and are not within the same viewshed as the Project. As discussed above, the Project would not result in any direct or indirect impacts to historical resources. Furthermore, the Project would not substantially change the existing look and feel of the surrounding area to the extent that the

significance of any nearby historical resource would be impaired. Similar to the Project, Related Project No. 4 would continue be physically separated from the potentially historical resources within the Project vicinity and would not affect the setting of any of these potential resources. Additionally, the Project Site is not located within the boundaries of a designated historic district, so there would be no potential to contribute to cumulative impacts on a historic district. Furthermore, the Project would not diminish the number or significant of historical resources of the same property types, as the Project Site does not contain any historical resources. Therefore, Project impacts to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to potential cumulative impacts related to archaeological resources and human remains, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources and/or human remains are uncovered, each related project would be required to comply with applicable regulatory requirements regarding the inadvertent discovery of archaeological resources. In addition, project-specific mitigation would be applied, as necessary***.***

Overall, based on the above, cumulative impacts associated with archaeological resources, tribal cultural resources, and human remains would be less than significant and would not be cumulatively considerable.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

The 2020–2045 RTP/SCS PEIR MMRP did not identify any mitigation measures specifically regarding Energy. However, PMM GHG-1, outlined in Section XII, Greenhouse Gas Emissions, below, identifies measures capable of avoiding or reducing the significant effects of increased residential energy consumption. While this mitigation measure mainly serves to reduce the Project's GHG emissions, measures contained in PMM GHG-1, such as use of energy efficient materials, lighting, and heating and cooling systems, would also serve to reduce the Project's energy usage. As described in the impact analysis below, the Project would incorporate multiple green building and energy efficiency measures in compliance with CALGreen and the LA Green Building Code. In addition, the Project would provide electric vehicle charging stations and infrastructure as well as bicycle parking spaces in compliance with LAMC requirements. Collectively, these regulatory compliance measures and project features are equal

to or more effective than PMM GHG-1 for reducing residential energy consumption. Since the Project would comply with existing energy efficiency standards and incorporate energy reduction practices, the Project would not result in a wasteful or inefficient use of energy. Thus, relative to energy, the measures included in PMM GHG-1 are not incorporated into the Project.

Impact Analysis

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. With regard to Energy Threshold (a), this analysis relies upon Appendix F of the CEQA Guidelines as well as the *L.A. CEQA Thresholds Guide*. Appendix F of the CEQA Guidelines was prepared in response to the requirement in PRC Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth "[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by-case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

In accordance with Appendix F and the *L.A. CEQA Thresholds Guide*, the following criteria will be considered in determining whether this threshold of significance is met:

a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;

b) The effects of the project on local and regional energy supplies and on requirements for additional capacity;

c) The effects of the project on peak and base period demands for electricity and other forms of energy;

d) The degree to which the project complies with existing energy standards;

e) The effects of the project on energy resources;

f) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

g) The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

h) Whether the Project conflicts with adopted energy conservation plans.

The following analysis considers these eight criteria (a through h) in the analysis below.

a. The project's energy requirements and its energy use efficiencies by amount and fuel type for each state of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operations, and maintenance activities).

For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping, and architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Project removal activities of the structures constructed under this Project would include demolition or abandonment of the site. However, it is not known when the Project would be removed. Therefore, analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the construction of the new buildings, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As shown in Table 8 on page 125 and as discussed further below, Project construction would consume approximately a total of 78,528 gallons of gasoline, and approximately 459,441 gallons of diesel.

Electricity

Electricity would be supplied to the Project Site by LADWP and would be obtained from both existing infrastructure serving the Project Site and gas- and/or diesel-powered portable generators, as required. As shown in Table 8, approximately 88,882 kilowatt-hours (kWh) of electricity would be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area), which would result in the conservation of energy. Therefore, the use of

Table 8
Summary of Energy Use During Construction[a]

Fuel Type	Quantity
Electricity	
Water Consumption (Dust Control)[b]	48,058 kWh
Construction Temporary Power (Lighting, power tools)	40,824 kWh
Total Electricity	**88,882 kWh**
Gasoline	
On-Road Construction Equipment	78,528 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	**78,528 gallons**
Diesel	
On-Road Construction Equipment	236,565 gallons
Off-Road Construction Equipment	222,875 gallons
Total Diesel	**459,441 gallons**

kWh = kilowatt-hour

Note: Numbers may not add up exactly due to rounding.

[a] *Detailed calculations are provided in Appendix 6 of this SCEA.*

[b] *Energy usage associated with supply and conveyance of water from the source.*

Source: Eyestone Environmental, November 2021.

electricity during project construction would be minimal and would not be wasteful, inefficient, or unnecessary.

Natural Gas

Construction activities, including the construction of the new buildings, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction.

Transportation Energy

The petroleum-based fuel use summary provided in Table 9 on page 126 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions. As shown, on- and off-road vehicles would consume an estimated 78,528 gallons of gasoline and approximately 459,441 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.007 percent of the 2023 annual on-road gasoline-related energy consumption and 0.04 percent of the 2023 annual diesel fuel-related energy consumption in Los Angeles County.[54]

[54] California Energy Commission, 2010–2019 Gasoline and Diesel Sales, www.energy.ca.gov/media/3874, accessed June 4, 2021.

Table 9
Summary of Total Annual Energy Use During Operation[a]

Source	Project with Project Features
Electricity	
Building	3,380,341 kWh
Water	485,102 kWh
EV Chargers	3,011 kWh
Total Electricity	**3,868,454 kWh**
Natural Gas	**6,253,082 cf**
Mobile (Transportation)	
Gasoline	550,136 gallons
Diesel	95,254 gallons
Total Transportation Fuel	**645,390 gallons**

cf = cubic feet

kWh = Kilowatt-hour

EV = electric vehicle

[a] *Detailed calculations are provided in Appendix E of this SCEA. Energy usage presented is net increase (new construction minus existing uses to be removed).*

Source: Eyestone Environmental, November 2021.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC; refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table 9, the Project's net demand for electricity would be approximately 3,868,454 kWh per year. As shown in Table 9, the Project's net demand for natural gas would be 6,253,082 kBTU per year. As shown in Table 9, the Project's net demand for gasoline and diesel would be 550,136 and 95,254 gallons per year, respectively.

Electricity

With compliance with Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 3,868,454 kWh per year (refer to Table 9). Based on LADWP's 2017 Resource Plan, LADWP forecasts that its total energy sales in the 2026–2027 fiscal year (the Project's buildout year) will be 24,078 gigawatt hour (GWh) of electricity.[55] As such, the Project-related net increase in annual

[55] LADWP, 2017 Final Power Strategic Long-Term Resource Plan, www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc;jsessionid=2fFxgTvGshQgMvXXym0hyxXKgpQGXFn7grVFBPmpBm4ZQpnkT7lD!-183030449?_adf.ctrl-state=kt54p3wl_4&_adf.c))&&_afrLoop=394258500519456&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D394258500519456%26_adf.c%2529%2529%3D%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dofkjmjh5w_4, accessed April 15, 2022.

electricity consumption would represent only approximately 0.02 percent of LADWP's projected sales in 2026–2027. In addition, LADWP is committed to ensuring the sustainability of its power supply, and is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020 and at least 50 percent by 2030, which will ensure that projected supplies will be more than sufficient to meet demand.

Natural Gas

The Southern California Gas Company (SoCal Gas) provides natural gas service to the Project Site vicinity. With compliance of Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project is anticipated to generate a net increase in the on-site demand for natural gas totaling approximately 6,253,082 cubic feet (cf) per year, or approximately 17,132 cf per day. Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCal Gas's planning area will be approximately 2.26 billion cf per day in 2027.[56] The Project's natural gas consumption would account for approximately 0.0007 percent of the forecasted 2027 consumption in SoCal Gas's planning area.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As shown in Table 9 on page 126, the Project's net demand for gasoline and diesel would be approximately 550,136 and 95,254 gallons per year, respectively. The Project Site is located in a High Quality Transit Area (HQTA) and a Neighborhood Mobility Area (NMA) and along a Livable Corridor, as designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective.[57] Extensive public bus service is provided within the Project study area.

The existing transit services in the vicinity of the Project Site would provide Project employees, residents, and guests with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle parking areas for Project residents and guests. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. These Project characteristics would result in a corresponding reduction in VMT and associated transportation energy consumption and reduce the potential for inefficient, wasteful, and unnecessary use of energy. These specific transportation demand management measures include reduced parking, unbundled parking with $100 extra charge, pedestrian project enhancements, and bicycle parking. Furthermore, the Project would install EV ready and EV equipped parking spaces at the Project Site. As such, operational impacts to transportation energy would be less than significant.

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[56] California Gas and Electric Utilities, 2020 California Gas Report, www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf, accessed April 15, 2022.

[57] According to the 2020–2045 RTP/SCS an HQTA is a corridor-focused PGA within one half mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours; an NMA is a PGA with a high number of intersections, low observed travel speed, high mix of uses and high accessibility to "everyday" destinations where complete streets and sustainability policies support and encourage replacing or reducing single and multi-occupant automobile use; and a Livable Corridor is an arterial roadway where local jurisdictions may plan for a combination of high-quality bus frequency, higher density residential and employment at key intersections, and increased active transportation through dedicated bikeways.

b. The effects of the project on local and regional energy supplies and on requirements for additional capacity

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents far less than the estimated net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities. Thus, there would be no demand generated by construction, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.006 percent of gasoline usage and approximately 0.04 percent of diesel usage within Los Angeles County, respectively. [58] As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption during the construction period.

Operation

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2026–2027 fiscal year (the Project's buildout year) will be 24,078 GWh of electricity.[59] As such, the Project-related net increase in annual electricity consumption of 3,868,454 kWh per year would represent approximately 0.02 percent of LADWP's projected sales in 2027. Furthermore, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area (Appendix I of the Strategic Long-Term Resources Plan).

Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCal Gas's planning area will be approximately 2.26 billion cf per day in 2027.[60] The Project's natural gas consumption would account for approximately 0.0007 percent of the forecasted 2027 consumption in SoCal Gas's planning area.

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[58] California Air Resources Board, EMFAC2017 Web Database, www.arb.ca.gov/emfac/2017/. Details provided in Appendix B of this SCEA.

[59] LADWP, 2017 Final Power Strategic Long-Term Resource Plan, www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc;jsessionid=2fFxgTvGshQgMvXXym0hyxXKgpQGXFn7grVFBPmpBm4ZQpnkT7ID!-183030449?_adf.ctrl-state=kt54p3wl_4&_adf.c))&&_afrLoop=394258500519456&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D394258500519456%26_adf.c%2529%2529%3D%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dofkjmjh5w_4, accessed April 15, 2022.

[60] California Gas and Electric Utilities, 2020 California Gas Report, www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf, accessed April 15, 2022.

As energy consumption during Project operations would be relatively negligible and energy requirements are within LADWP's and SoCal Gas' service provision, Project operational impacts on energy usage would be less than significant.

c. The effects of the project on peak and base period demands for electricity and other forms of energy

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.3 percent would be sufficient to account for future electrical demand by the Project.[61] Therefore, Project electricity consumption during operational activities would have a negligible effect on load conditions of the power grid.

d. The degree to which the project complies with existing energy standards

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.[62] Electricity and Natural Gas usage during Project operations presented in Table 7 would comply with Title 24 standards and applicable CalGreen requirements and Los Angeles Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project Site are assumed to comply with CAFE fuel economy standards, as required.

Based on the above, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage, as well as transportation fuel consumption.

e. Effects of the Project on Energy Resources

LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP's most recently adopted 2017

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61 LADWP, 2018 Retail Electric Sales and Demand Forecast, p. 6, https://rates.ladwp.com/Admin/Uploads/Load%20Forecast/2019/04/2018%20Load%20Forecast_Final.pdf, accessed April 15, 2022.

62 Energy Independence and Security Act of 2007, Public Law 110-140, www.govinfo.gov/content/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf, accessed April 15, 2022.

Power Strategic Long-Term Resources Plan identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.[63] According to the U.S. Energy Information Administration (EIA), the United States currently has over 92 years of natural gas reserves.[64] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[65] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above, LADWP is required to procure at least 50 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 34 percent of LADWP's overall energy mix in 2019, the most recent year for which data are available.[66] This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[67]

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63 California Gas and Electric Utilities, 2020 California Gas Report.

64 U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed January 28, 2021.

65 BP Global, Oil Reserves, www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html#oil-reserves, accessed January 28, 2021.

66 LADWP Annual Power Content Labels for 2019 www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-powercontentlabel;jsessionid=vGFXh6pJbvXNrlTynjQnBlfj2tvqxWNK7VymwNX6ZqfnZgHqhT9Q!-1877066039?_afrLoop=741909442724082&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D741909442724082%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsdmaarz3b_4, accessed September 9, 2021.

67 California Energy Commission, Systems Assessment & Facilities Siting Division Cartography Unit, California Wind Resource Potential Map, https://planning.lacity.org/eir/8150Sunset/References/6.0.%20Other%20CEQA%20Considerations/OTHER.05_CEC,%20California%20Wind%20Resource%20Potential_August%202014.pdf, accessed April 15, 2022.

f. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives

As discussed above, the Project would include project features to reduce VMT during operational activities. The Project's high density design and location to job centers and retail uses would allow for residents to live closer to services and shopping areas, reducing VMT. The design, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, also encourages non-automotive forms of transportation such as walking or biking to destinations. In addition, the Project would be located in close proximity to multiple existing and future transit stops. As further discussed under Item VIII, Greenhouse Gas Emissions, these measures would result in an approximately 15-percent reduction in GHG emissions from mobile sources, with a corresponding reduction in the Project's petroleum-based fuel usage. Therefore, the Project would encourage the use of efficient transportation alternatives.

g. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements

The current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Therefore, the Project would incorporate measures that are above and beyond current State and City energy conservation requirements. This includes many of the measures outlined in SCAG's PMM GHG-1. While this mitigation measure serves to reduce the Project's GHG emissions, measures contained in PMM GHG-1 such as use of energy efficient materials, lighting and heating and cooling systems, would also serve to reduce the Project's energy usage.

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

With implementation of these features along with complying with state and local energy efficiency standards, the Project would meet and/or exceed all applicable energy conservation policies and regulations.

h. Whether the Project conflict with adopted energy conservation plans

As discussed under Item VIII, Greenhouse Gas Emissions, the City has published its LA Green Plan/ ClimateLA in 2007 as well as the Green New Deal in 2020, which outline goals and actions by the City to reduce GHG emissions. To facilitate implementation of the LA Green Plan/Climate LA, the City adopted the Green Building Code. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and under Item XI, Land Use and Planning, SCAG's 2020–2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2020–2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2020–2045 RTP/SCS. Most notably, the Project would be an infill mixed-use development developed within an HQTA and NMA and along a Livable Corridor. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including Metro and LADOT bus lines. The introduction of new housing and job opportunities within an HQTA, as proposed by the Project, is consistent with numerous policies in the 2020–2045 RTP/SCS related to locating new housing and jobs near transit. The 2020–2045 RTP/SCS would result in an estimated 19 percent decrease in VMT by 2035. As discussed above, OPR recommended that achieving 15 percent lower per capita (residential or employee) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals (i.e., SB 375 goal).

Thus, consistent with the 2020–2045 RTP/SCS, the Project would result in an approximately 26-percent reduction in VMT from mobile sources in comparison to a Project without reduction measures (e.g., density and proximity to transit, TDM measures, and mitigation measures), and, consequently, the Project's petroleum-based fuel usage would be reduced.[68] In addition, the Project would comply with state energy efficiency requirements, and would use electricity from LADWP, which has a current renewable energy mix of 34 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. ***Based on the above, the Project would be consistent with adopted energy conservation plans.***

Conclusion

As demonstrated in the analysis above, the Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during based and peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During construction the Project would comply with Title 24 energy efficiency standards where applicable resulting in efficient use of energy. During operations, the Project would comply with applicable energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond requirements. ***Thus, overall, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation, and impacts would be less than significant.***

[68] The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. With regard to Energy Threshold (b) the Project was evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CalGreen and City building codes. Also, as discussed under Item VIII, Greenhouse Gas Emissions, of this SCEA, the Project would also be consistent with the SCAG RTP/SCS which includes goals to reduce VMT and corresponding decrease in fuel consumption.

The Project would be subject to the energy conservation requirements of the California Energy Code (Title 24 of the California Code of Regulations, Part 6) and the California Green Building Standards Code (24 CCR part 11). The California Energy Code provides energy conservation standards for all new and renovated commercial buildings constructed in California. The Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. The Code provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including: appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls and ceilings. The Code also emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. In addition, the California Green Building Standards Code sets targets for: energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including eco-friendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels.

The City of Los Angeles adopted and released the City's first ever Sustainable City pLAn, which set short term and longer term energy and conservation targets geared towards advancing the City's economy and equity. In 2019, the City of Los Angeles prepared the 2019 Green New Deal, which provided an expanded vision of the pLAn, focusing on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the Green New Deal, the City would cut an additional 30 percent in greenhouse gas (GHG) emissions above and beyond the 2015 pLAn and ensures that the City stays within its carbon budget between now (2021) and 2050.[69] A consistency analysis is provided under Item VIII, Greenhouse Gas Emissions, which outlines specific policies that the Project would be consistent with. To summarize, the Project would be required to comply with the Title 24 standards for Energy Efficiency and Conservation that are in effect at the time of development. In addition, per compliance with the California Energy Code, the Project would allocate roof area for future solar panels. ***Incorporation of these design features, combined with compliance with regulatory standards, would ensure that the Project would not conflict with energy and conservation measures provided by the state or City, and as such, no impacts would occur.***

[69] City of Los Angeles, L.A.'s Green New Deal Sustainable City pLAn 2019, https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf, accessed April 15, 2022.

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative impacts analysis regarding electricity is LADWP's service area and the geographic context for the cumulative impacts analysis regarding natural gas is SoCal Gas service area. The City has determined to assess the Project's potential cumulative impacts in the context of County-wide consumption. Growth within these geographic areas is anticipated to increase the demand for energy, as well as the need for energy infrastructure, such as new or expanded energy facilities. The Project's contribution to cumulative impacts related to energy consumption would not result in a cumulatively considerable effect related to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation. ***As such, the Project's impacts would not be cumulatively considerable and cumulative energy impacts would be less than significant.***

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.

b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.

c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.

d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.

Applicability to the Project

Consistent with PMM GEO-1(a), a Geotechnical Investigation was prepared for the Project, which includes site-specific measures regarding areas of potential geological risk. Furthermore, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code and would be required to provide a final design-level geotechnical report, subject to Los Angeles Department of Building and Safety (LADBS) review and approval, prior to the issuance of grading permits for the Project. In addition, the Project would be required to comply with existing City and state regulations regarding erosion control, drainage, and stormwater management. Compliance with existing regulatory requirements would be equal to or more effective than the measures included in PMM GEO-1, as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards, and the proposed buildings would be constructed in accordance with all City required geotechnical requirements. In addition, the Project-specific mitigation measures outlined below would reduce any potential impacts to less than significant levels. As such, PMM GEO-1 is not applicable to the Project.

PMM GEO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.

b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.

c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.

d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:

    1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.

2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.
3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.
4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.

e) Avoid routes and project designs that would permanently alter unique geological features.

f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.

g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.

h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.

Applicability to the Project

As analyzed below, no known paleontological resources have been identified at the Project Site. Notwithstanding, to avoid potential impacts due to the inadvertent discovery of paleontological resources during the Project's grading and excavation period, the Project would comply with all applicable regulatory requirements regarding, which are equal to or more effective than the relevant measures included in PMM GEO-2. Thus, PMM GEO-2 is not applicable to the Project.

Impact Analysis

The following analysis is largely based on the Geotechnical Investigation—Proposed Multi-Use Development 12805–12825 West Ventura Boulevard (Geotechnical Investigation) prepared for the Project by Geocon West, Inc., dated September 2020.

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, major fault locations are identified in the City of Los Angeles Local Hazard Mitigation Plan.[70]

Based on the Geotechnical Investigation and a review of the City's Zone Information and Map Access System (ZIMAS), the Project Site is not within an Alquist-Priolo Earthquake Fault Zone and no known active faults underlie the Project Site.[71] According to the Geotechnical Investigation, the closest active fault to the Project Site that is considered capable of surface rupture is the Hollywood Fault, located approximately 3.9 miles southeast of the Project Site.[72] Therefore, as there are no known faults underlying the Project Site, the risk for surface rupture at the Project Site is considered low. Furthermore, while the Project would involve excavation up to 52 feet below ground surface (bgs) for the three subterranean parking levels, the proposed development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. Nevertheless, the Project would comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code and would provide a final design-level geotechnical report, subject to Los Angeles Department of Building and Safety (LADBS) review and approval, prior to the issuance of grading permits for the Project***. Compliance with existing City regulatory requirements would further ensure that the Project would not directly or indirectly cause or exacerbate potential***

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70 City of Los Angeles, Local Hazard Mitigation Plan, 2018, Figure 9-2.

71 City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 2375021027, 2375021028, and 2375021029, http://zimas.lacity.org/, accessed June 4, 2021.

72 Geocon West, Inc., Geotechnical Investigation—Proposed Multi-Use Development 12805–12825 West Ventura Boulevard, June 30, 2021. (Appendix F of this SCEA).

substantial adverse effects, including the risk of loss, injury, or death related to rupture of a known earthquake fault. Impacts would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on a local or regional fault. However, as noted above, no active faults are known to pass directly beneath the Project Site and therefore, the Project would not exacerbate existing environmental conditions such that people or structures would be exposed to strong seismic ground shaking. In addition, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions such as strong seismic ground shaking. Therefore, development of the Project would not result in strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Additionally, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The LADBS is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by LADBS. The final geotechnical report would include the recommendations of the Geotechnical Investigation included as Appendix F of this SCEA, and its final recommendations would be enforced by the LADBS for the construction of the Project. In addition, before permits can be issued for construction, the Project must demonstrate compliance with the applicable provisions of seismic safety plans and regulations, including, but not limited to, the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, and the City's General Plan Safety Element. ***Therefore, based on the above, through compliance with regulatory requirements, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to strong seismic ground shaking. Thus, impacts related to exposure to strong seismic ground shaking would be less than significant.***

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, relatively cohesionless soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

According to the California Department of Conservation's Seismic Hazard Zones Map for the Van Nuys Quadrangle, the Project Site is located within a liquefaction hazard zone.[73] This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. The Safety Element of the Los Angeles City General Plan, which incorporates the 2018 Local Hazard Mitigation Plan, also indicates that the Project Site is located within a liquefiable area (recent alluvial deposits; ground water less than 30 feet deep).[74] Furthermore, ZIMAS indicates that the Project Site is located in an area that has been identified by the State as being potentially susceptible to liquefaction. As noted in the Geotechnical Investigation, groundwater has been encountered at the Project Site at depths ranging from 17.5 to 25 feet below ground surface. Thus, a liquefaction analysis was performed as part of the Geotechnical Investigation, which analyzed impacts for a Design Earthquake event and a Maximum Considered Earthquake (MCE) event. The analysis found that alluvial soils below one level of subterranean construction could be susceptible to up to 2.4 inches of liquefaction-induced settlement during a Design Earthquake and MCE ground motion. The resulting differential settlement at the ground surface is anticipated to be approximately half of the total settlement, or 1.2 inches of settlement over a distance of 20 feet. However, the alluvial soils below three levels of subterranean construction would not be prone to liquefaction induced settlement during Design Earthquake and MCE ground motion. Project design and construction would comply with all applicable requirements of the LADBS for a site located within a potentially liquefiable area. Specifically, final design plans and a final design-level geotechnical report shall be submitted to LADBS for review and approval. This report shall be used for final design of the foundation system for the proposed structures and shall take into consideration the engineering properties beneath the proposed subterranean parking garage and the projected loads. The final report shall specify geotechnical design parameters that are needed by structural engineers to determine the type and sizing of structural building materials. The final report shall be subject to the specific performance criteria imposed by all applicable state and local codes and standards. The final geotechnical report shall be prepared by a registered civil engineer or certified engineering geologist and include appropriate measures to address seismic hazards and ensure structural safety of the proposed structures. The proposed structures shall be designed and constructed in accordance with all applicable provisions of the California Building Code and the Los Angeles Building Code. The design-level geotechnical report shall address each of the grading and foundation recommendations provided in the *Geotechnical Investigation* prepared by Geocon West, Inc., dated June 30, 2021. With compliance with regulatory requirements, including the incorporation of the recommended structural enhancement into the design and construction of the Project, the Project would not expose people or structures to potential substantial adverse effects related to liquefaction, and potential impacts would be less than significant.

With regard to lateral spreading, the Project Site is bounded to the north by the Los Angeles River, which, adjacent to the Project Site, has been channelized. Thus, based on the absence of unsupported soil slopes, the potential for lateral spreading is considered to be low. Similarly, the Project Site is not located with a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area, or within an area that is identified as having a potential for seismic slope instability. The site gently slopes to the north and is not near or in the path of any known or potential landslides. As such, the potential for slope stability hazards is also considered low.

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[73] California Department of Conservation, Information Warehouse Regulatory Maps, https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/, accessed January 5, 2021.

[74] Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, 2021; City of Los Angeles, Local Hazard Mitigation Plan, 2018, Figure 9-20 – South Valley APC Liquefaction Zones, p. 9-27.

Based on the above, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to seismic-related ground failure, including liquefaction. Thus, impacts would be less than significant.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site is located within an urban area with a topography that slopes gently north. As discussed above, the Project Site is not located in a landslide area as mapped by the State of California.[75] Furthermore, the Project Site is not mapped as a landslide area by the City of Los Angeles.[76,77] There are no known landslides near the Project Site, and the Project Site is not in the path of any known or potential landslides. The Project Site's existing topography would not be substantially altered by the Project and development of the Project would not cause landslides. ***As such, the Project would not exacerbate existing conditions that would directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides, and no impact would occur.***

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. However, as outlined in the Hydrology and Water Quality Report prepared for the Project by KPFF, included as Appendix I of this SCEA, Project construction would occur in compliance with local construction regulations that would implement the requirements of the NPDES permit. In accordance with the NPDES permit, the Project would implement a SWPPP that would specify site-specific BMPs and erosion control measures to be used during construction to manage soil surface and prevent soil particles from detaching. Erosion control BMPs during construction could include, but would not be limited to, the use of geotextiles and mats, earth dikes, drainage swales, and slope drains. The Project's construction BMPs would be outlined in an Erosion Control Plan that would be reviewed by the State Water Resources Control Board (SWRCB). In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce erosion and sedimentation. In addition, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills.

At buildout, the Project Site would consist of approximately 75 percent impervious surfaces. While this is a decrease as compared to current conditions, which include 90 percent impervious surfaces, the majority of the Project Site would remain pervious, thereby minimizing areas with exposed topsoil and a resulting increase in stormwater runoff and the associated potential for water-borne erosion. In accordance with

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75 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed June 4, 2021.

76 City of Los Angeles General Plan Safety Element, 2021, Local Hazard Mitigation Plan, 2018, Figure 11-11—Landslide Hazard Areas in the South Valley APC, p. 11-12.

77 City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 2375021027, 2375021028, and 2375021029, http://zimas.lacity.org/, accessed June, 2021.

the requirements of the NPDES permit and the City's LID Ordinance, measures would be implemented throughout the operational life of the Project to reduce erosion, including the installation of capture and use system BMPs, as discussed below. ***Therefore, based on the above, with compliance with applicable regulatory requirements that include the implementation of BMPs, the Project would not result in substantial soil erosion or the loss of topsoil during construction or operation. Impacts would be less than significant.***

c. Would the project be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant With Mitigation Incorporated. As discussed above, the Project Site is not located near slopes or geologic features that would result in or exacerbate on- or off-site landsliding. Therefore, no impacts related to landslides would occur.

As previously discussed, liquefaction-related effects include lateral spreading, which refers to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement. Although the Project Site is located in an identified liquefiable area, the potential for lateral spreading is considered low. The Los Angeles River, which is adjacent to the north of the Project Site, has been channelized. In addition, the Project Site is generally flat with gentle northerly slope. Thus, based on the absence of unsupported soil slopes, the potential for lateral spreading is considered to be low. Nonetheless, Project design and construction would comply with all applicable requirements of the LADBS for a site located within a potentially liquefiable area, as well as site-specific design recommendations set forth in the Geotechnical Investigation. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts related to lateral spreading would be less than significant.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No large scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site. In addition, the Project Site is not located within an area of known ground subsidence. Therefore, there is minimal to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, as concluded in the Geotechnical Investigation, the potential for subsidence is considered low.

The Project's potential impacts associate with liquefaction are addressed above under Threshold (a).iii. As discussed therein, the Project Site is located within a liquefaction hazard zone as mapped by the California Department of Conservation, a liquefiable zone as indicated in the Safety Element of the General Plan, and an area that has been identified by the State as being potentially susceptible to liquefaction, as indicated in ZIMAS. As analyzed in the Geotechnical Investigation, the alluvial soils below one level of subterranean construction could be susceptible to up to 2.4 inches of liquefaction settlement during a Design Earthquake and MCE ground motion. The resulting differential settlement at the ground surface is anticipated to be approximately half of the total settlement, or 1.2 inches of settlement over a distance of 20 feet. As outlined above, through compliance with regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report impacts associated with liquefaction would be less than significant with implementation.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater

than those reached by typical rain events. According to the Geotechnical Investigation, soils underlying the Project Site indicate fine- to medium-grained to very dense silty sands, clayey sand and sandy clay. Due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant.

Overall, based on the above, impacts associated with on- or off-site landslides, lateral spreading, subsidence, and collapse would be less than significant and no mitigation would be required. In addition, compliance with regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical report would ensure that the Project would not result in on- or off-site liquefaction, and impacts would be less than significant.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. According to the Geotechnical Investigation, the existing soils encountered between depths of 10 feet to 15 feet are considered to have a "high" expansive potential (Expansion Index = 102) based on the 1997 Uniform Building Code, and are classified as "expansive" based on the 2019 California Building Code.[78] Based on depth of the proposed subterranean parking levels, the foundations and slabs at the subterranean levels would not be prone to the effects of expansive soils. However, on-grade foundations and slabs will derive support in soils with a high expansion potential. Project design and construction would comply with all applicable requirements of LADBS for a site with underlying expansive soils and would implement the recommendations set forth in the site-specific geotechnical report prepared by the geotechnical engineer and approved by LADBS. ***Therefore, compliance with regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical report would ensure that the Project would not create substantial direct or indirect risks to life or property associated with expansive soils. Impacts would be less than significant.***

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project Site is located within a community served by existing wastewater infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. **No impact related to the use of septic tanks or alternative wastewater disposal systems would occur.**

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[78] According to the 1997 Uniform Building Code (Table 18-I-B), soils with and Expansion Index between 91 and 130 are considered to have a high expansive potential. According to Section 1803.5.3 of the 2019 California Building Code, soils with an Expansion Index greater than 20 are considered to be expansive.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact.

Geologic Features

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site. Thus, the Project would not destroy any distinct and prominent geologic or topographic features and no impacts would occur.

Paleontological Resources

Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is located within an urbanized area and has been subject to repeated grading and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed. A Project-specific paleontological records search for the Project Site was conducted by the Natural History Museum of Los Angeles County in March 2021, which is included as Appendix G of this SCEA. As outlined therein, there are no previously encountered fossil vertebrate finds located within the Project Site. However, according to the records search, vertebrate fossil localities have been discovered nearby from the same sedimentary deposits that occur on the Project Site either at the surface or at depth. Surface deposits throughout the Project Site consist of soil on top of Holocene-age Alluvium and Miocene age sedimentary bedrock of the Modelo Formation.

As outlined in the paleontological records search, the closest known vertebrate fossil localities to the Project Site are LACM 1282, LACM 4502, LACM 4505, LACM 4507, and LACM 4457, which were collected from the Modelo Formation deposits at the surface and produced numerous fossilized fish (*Chondrichthyes and Osteichthyes*). The paleontological records search indicated that the location of these five localities is along Dixie Canyon Road north of Mulholland Drive. It is likely that they were encountered near where Dixie Canyon Avenue meets the Los Angeles River, which is approximately 0.8 mile northeast of the Project Site. However, Dixie Canyon Avenue (and Dixie Canyon Place) extend south to Mulholland Drive, so these localities could also be located up to approximately 1.0 mile southwest of the Project Site.[79]

Further afield, the vertebrate fossil locality LACM 6970 produced a fossil ground sloth (*Glossotherium)*, camel (*Cameolops)*, and bison (*Bison)*, at a depth of 60-80 feet below ground surface near Lankershim

[79] The paleontological records search indicates that these fossil localities were collected on Dixie Canyon Road. However, within the Project vicinity, there is only a Dixie Canyon Avenue and a Dixie Canyon Place.

Boulevard and Bloomfield Street during excavations for the Metro B (Red) Line tunnels and stations, approximately 2.68 miles northeast of the Project Site. The vertebrate fossil localities LACM 3263 and LACM 6208 produced a fossil horse family (*Equidae)* and bison (*Bison)*, at a depth of 11–20 feet below ground surface at 5112 Kester Avenue during sewer excavations, approximately 2.86 miles northwest of the Project Site. Additionally, vertebrate fossil localities LACM 6386 and LACM 6306 produced a fossil rodent (*Rodentia)*, frog (*Anura)*, lizard (*Lacertilia)*, and snake (*Serpentes)*, at a depth of 60 feet below ground surface at the Universal City Station for the Metro B (formerly Red) Line, approximately 2.86 miles southeast of the Project Site.

Very shallow excavations in the Holocene-age alluvial deposits underlaying the Project Site are unlikely to uncover significant vertebrate deposits. However, the Project would include excavations up to a maximum depth of 52 feet. Thus, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present. The Project would comply with all applicable regulatory requirements regarding inadvertent discovery of paleontological resources, including the temporary halting of construction and evaluation of the find by a qualified paleontologist.

Overall, the Project would not directly or indirectly destroy a unique geologic feature and, with adherence to all regulatory requirements, would not directly or indirectly destroy a unique paleontological resource. Thus, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), impacts associated with geology and soils are generally evaluated within the context of each individual project rather than on a cumulative basis. Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), geological impacts are typically assessed on a project-by-project basis, rather than on a cumulative basis. Nonetheless, cumulative growth in the surrounding area (inclusive of the Project and the five related projects identified in Table 35, below) would expose a greater number of people to seismic hazards. However, as with the Project, related projects and other future development project would be required to comply with existing regulatory requirements and the City's grading permit review and approval process, as well as site-specific geotechnical evaluations that would identify potential effects related to the underlying geologic and soil conditions for a particular related project site. In addition, in the event that paleontological resources are uncovered, each related project would be required to comply with the applicable regulatory requirements regarding inadvertent discovery of paleontological resources. ***Therefore, cumulative impacts related to geology and soils (including paleontological resources) would not be cumulatively considerable and cumulative impacts would be less than significant.***

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:

i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit.

ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.

iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.

iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment.

v. Use high-efficiency lighting and cooking devices.

vi. Incorporate passive solar design.

vii. Use high-reflectivity building materials and multiple glazing.

viii. Prohibit gas-powered landscape maintenance equipment.

ix. Install electric vehicle charging stations.

x. Reduce wood burning stoves or fireplaces.

xi. Provide bike lanes accessibility and parking at residential developments.

b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.

c) Include off-site measures to mitigate a project's emissions.

d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:

   i. Use energy and fuel-efficient vehicles and equipment;

   ii. Deployment of zero- and/or near-zero-emission technologies;

   iii. Use lighting systems that are energy efficient, such as LED technology;

   iv. Use the minimum feasible amount of GHG-emitting construction materials;

   v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;

   vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;

   vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy;

   viii. Incorporate design measures to reduce water consumption;

   ix. Use lighter-colored pavement where feasible;

   x. Recycle construction debris to maximum extent feasible;

   xi. Plant shade trees in or near construction projects where feasible; and

   xii. Solicit bids that include concepts listed above.

e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:

   i. Promote transit-active transportation coordinated strategies;

   ii. Increase bicycle carrying capacity on transit and rail vehicles;

   iii. Improve or increase access to transit;

   iv. Increase access to common goods and services, such as groceries, schools, and day care;

   v. Incorporate affordable housing into the project;

   vi. Incorporate the neighborhood electric vehicle network;

   vii. Orient the project toward transit, bicycle and pedestrian facilities;

   viii. Improve pedestrian or bicycle networks, or transit service;

   ix. Provide traffic calming measures;

   x. Provide bicycle parking;

   xi. Limit or eliminate park supply through;

   xii. Elimination (or reduction) of minimum parking requirements

   xiii. Creation of maximum parking requirements

   xiv. Provision of shared parking.

   xv. Unbundle parking costs;

   xvi. Provide parking cash-out programs;

xvii. Implement or provide access to commute reduction program;

f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;

g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and

h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:

   i. Provide car-sharing, bike sharing, and ride-sharing programs;

   ii. Provide transit passes;

   iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;

   iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;

   v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;

   vi. Provide employee transportation coordinators at employment sites;

   vii. Provide a guaranteed ride home service to users of non-auto modes.

i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;

j) Land use siting and design measures that reduce GHG emissions, including:

   i. Developing on infill and brownfields sites;

   ii. Building compact and mixed-use developments near transit;

   iii. Retaining on-site mature trees and vegetation, and planting new canopy trees;

   iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and

   v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.

l) Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.

m) Encourage telecommuting and alternative work schedules, such as:
    i. Staggered starting times
    ii. Flexible schedules
    iii. Compressed work weeks
n) Implement commute trip reduction marketing, such as:
    i. New employee orientation of trip reduction and alternative mode options
    ii. Event promotions
    iii. Publications
o) Implement preferential parking permit program
p) Implement school pool and bus programs
q) Price workplace parking, such as:
    i. Explicitly charging for parking for its employees;
    ii. Implementing above market rate pricing;
    iii. Validating parking only for invited guests;
    iv. Not providing employee parking and transportation allowances; and
    v. Educating employees about available alternatives.

Applicability to the Project

As analyzed below, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen) that would be consistent with or as effective as the measures included in PMM GHG-1.

- The Project would integrate green building measures consistent with CalGreen (California Building Code Title 24). Specifically, the Project would comply with the 2019 Title 24 Standards which ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As described in the 2019 Title 24 Standards, the standards are "challenging but achievable design and construction practices" that represent "a major step towards meeting the Zero Net Energy (ZNE) goal." As discussed above in Subsection 3.3.7, the Project would include highly efficient HVAC systems; energy-efficient wall insulation and glazing units; and Energy Star–labeled appliances, or equivalent rating as may be applied at the time of construction. Furthermore, all exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology (See Subsection 3.3.5). The Project would also set aside a minimum area for potential installation of solar panels on residential and non-residential buildings at a later date as required by Title 24.

- The Project would comply with the City's EV charging requirements, which specify that 10 percent of new parking spaces would require EV charging equipment. In addition, 30 percent of all new parking spaces would be required to be EV "ready," which will be capable of supporting future EV charging equipment.

- Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of

non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility.

- The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[80] The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling.

In addition, the Project would implement Project Design Features that would also serve to reduce GHG emissions. As an example, WAT-PDF-1 would incorporate water conservation features in addition to those measures required by the City's current codes and ordinances. The Project would also include TDM strategies, as outlined in Project Design Feature TR-PDF-1 and Project Mitigation Measure TR-MM-1. These TDM strategies include the provision of bicycle parking, pedestrian network improvements, voluntary travel behavior change, reduced parking, and unbundled parking. In addition, as discussed below, GHG-PDF-1 would prohibit the installation of natural gas-powered hearths (fireplaces) in all residential units.

The Project would adhere to existing regulatory requirements regarding GHG emissions and the above Project Design Features, which are consistent with or as effective as PMM GHG-1 in reducing substantial adverse effects related to GHG emissions. As such, PMM GHG-1 is not applicable to the Project.

Impact Analysis

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact.[81] The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. Nor have SCAQMD, OPR, CARB, CAPCOA, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emission that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the analysis focuses on a project's consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions, as discussed under GHG Threshold (b). The evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG emissions-related impacts on the environment.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The

[80] Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

[81] The Less Than Significant Impact determination is based on the analysis included under GHG Threshold (b).

primary purpose of quantifying the Project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions.[82]

The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction

GHG emissions from construction activities were forecasted using a reasonable estimate of construction schedule and phasing and applying published GHG emission factors. Construction emissions were calculated using the CalEEMod model. The output values used in this analysis were adjusted to be Project-specific, based on usage rates, type of fuel, and construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix B of this SCEA).

The Project would include new residential, restaurant, retail, and other commercial uses totaling 650,996 square feet. Specifically, the Project would provide 520 residential units, 18,019 square feet of restaurant uses, 27,926 square feet of retail uses, and 64,151 square feet of residential amenity and accessory space. As presented in Table 10 on page 152, construction of the Project is estimated to generate a total of 8,961 metric tons of GHGs measured as an equivalent mass of carbon dioxide ($MTCO_2e$). As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emission estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.

A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix B of this SCEA.

Operation

The Project would include an increase of residential and commercial uses. This would result in direct and indirect GHG emissions generated by the increase in vehicular trips, as well as operations associated with the proposed uses, including: (1) building operations: emissions associated with space heating and cooling, water heating, and lighting; (2) water: emissions associated with energy used to pump, convey, treat, deliver, and re-treat water; and (3) solid waste: emissions associated with waste streams (embodied energy of materials). The Project would comply with the requirements under Title 24 and the Los Angeles Green Building Code, which would serve to reduce GHG emissions.

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[82] Pursuant to California Public Resources Code Sections 21155.2(b)(1) and 21159.28(a) any project specific or cumulative GHG related impacts associated with vehicular and/or truck trips are disclosed for informational (as opposed to impact evaluation) purposes. The SCEA statute specifies that these specific impacts do not need to be discussed or referenced in the document since the project is presumed to be consistent with the RTP/SCS.

Table 10
Construction-Related GHG Emissions
($MTCO_2e$)

Year	$MTCO_2e$[a]
2023	1,194
2024	2,686
2025	2,290
2026	2,715
2027	75
Total	8,961
Amortized Over 30 Years[b]	**299**

$MTCO_2e$ = metric tons of an equivalent mass of carbon dioxide

[a] *CO2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix B of this SCEA.*

[b] *As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.*

Source: Eyestone Environmental, September 2021.

Operational emissions from the sources described above were estimated using CalEEMod for the Project in order to determine the net incremental change in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the Project's daily VMT as discussed under Item XVII, Transportation, and in the Transportation Assessment included in Appendix L of this SCEA. The Project's daily VMT was calculated using the LADOT VMT Calculator (Appendix D of the Transportation Assessment). As shown in Table 11 on page 153, the Project, with implementation of regulatory requirements set forth in Title 24 and Los Angeles Green Building Code, including the use of LED lighting, as well as implementation of project design features and mitigation measures outlined herein, including WAT-PDF-1, TR-PDF-1, TR-MM-1, and GHG-PDF-1, would result in approximately 6,105 $MTCO_2e$ annually. As pointed out above, there is not an adopted numerical significance threshold for assessing impacts related to GHG emissions. Thus, a significance determination cannot be made relative to GHG Threshold (a). The following analysis, which includes an evaluation of the Project's consistency with applicable plans, policies, or regulations adopted for the purpose of reduction GHG emissions, is, therefore, used to determine the significance of the Project's GHG emissions-related impacts on the environment.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. As discussed above, in the absence of a quantifiable significant threshold for GHG Threshold (a), the following analysis is uses to determine significance levels related to GHG Threshold (a) and GHG Threshold (b).

Table 11
Operational Greenhouse Gas Emissions

Emission Source	Project With Regulatory Requirements (No Project Design Features or Mitigation Measures) CO_2e (metric tons)[a]	Project With Regulatory Requirements, Project Design Features, and Mitigation Measures CO_2e (metric tons)[a]
Area[b]	122	9[c]
Energy[d]	1,184	1,184
Mobile	5,516	4,704[e]
EV Charging[f]	(314)	(314)
Stationary[g]	2	2
Solid Waste[h]	44	44
Water/Wastewater[i]	177	177
Construction	299	299
Total Emissions	**7,030**	**6,105**

[a] *CO_2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix B of this SCEA.*

[b] *Area source emissions are from landscaping equipment.*

[c] *The reduction in area source emissions accounts for implementation of Project Design Feature GHG-PDF-1.*

[d] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates and account for compliance with 2019 Title 24 Standards and Los Angeles Green Building Code. As described in the 2019 Title 24 Standards, the standards are "challenging but achievable design and construction practices" that represent "a major step towards meeting the Zero Net Energy goal." Homes built under the 2019 standards will use about 53 percent less energy and approximately 30 percent less energy for nonresidential uses than those under the 2016 standards.*

[e] *The reduction in mobile source emissions accounts for project features such as increased density and proximity to transit as well as other VMT reduction measures (e.g., unbundled parking) that are included as TR-PDF-1 and TR-MM-1, which would reduce VMT and associated fuel usage in comparison to free-standing sites. This reduction in VMT was calculated within the LADOT VMT Calculator.*

[f] *EV Charging GHG emission reduction accounts for compliance with City requirements.*

[g] *Stationary source emissions are from an on-site emergency generator.*

[h] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates and accounts for compliance with City's mandated diversion goals.*

[i] *Water/wastewater emissions are calculated based on CalEEMod default water consumption rates and accounts for compliance with Los Angeles Green Building Code.*

Source: Eyestone Environmental, April 2022.

Consistency with Applicable Plans and Policies

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to the following:

- By 2010, reduce to 2000 emission levels;

- By 2020, reduce to 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. Executive Order (EO) B-30-15, which was issued in April 2015 by Governor Brown, requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.[83]

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) required by AB 32 in 2008.[84] The 2008 Scoping Plan proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[85] The First Update to the AB 32 Scoping Plan (First Update), released on May 22, 2014, found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.[86]

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Update).[87] The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources. These policies

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83 Executive Order B-55-18 establishes a new statewide goal to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

84 Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.

85 Climate Change Scoping Plan, CARB, December 2008, www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm, last reviewed April 3, 2013, accessed April 28, 2022.

86 CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, p. 34, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

87 CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf, accessed April 28, 2022.

include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constraints and reduces emissions at covered sources.[88]

The California Attorney General's Office has taken an active role in addressing climate change in CEQA documents. The Attorney General's Office has created and routinely updates a Fact Sheet listing project design features to reduce greenhouse gas emissions.[89] The Attorney General's Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that "local agencies will help to move the State away from 'business-as-usual' and toward a low-carbon future." The Fact Sheet explains that the listed "measures can be included as design features of a project," but emphasizes that they "should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming."

The Governor's Office of Planning and Research (OPR) recommended Amendments to the CEQA Guidelines for GHGs which were adopted on December 30, 2009. CEQA Guidelines Section 15064.4 was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section of the CEQA Guidelines urges lead agencies to quantify GHG emissions of projects where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. In addition to quantification, CEQA Guidelines Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to reduce or mitigate GHGs).

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead, lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.[90] The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.[91]

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project.[92,93] The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance

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88 CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 6.

89 California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.

90 CEQA Guidelines Section 15064.7(c).

91 CEQA Guidelines Section 15130 (f).

92 CEQA Guidelines Section 15064.4(a).

93 CEQA Guidelines Section 15064.4(a).

based standards for its determination.[94] A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.[95]

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, this analysis considers consistency with regulations or requirements set forth by the 2008 Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Green New Deal.

A significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

CARB's Climate Change Scoping Plan

The Scoping Plan includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

Mandatory Regulatory Compliance Measures

The following applicable mandatory reduction actions/strategies would serve to indirectly reduce Project GHG emissions.

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94 CEQA Guidelines Section 15064.4(a)(1)-(2).

95 CEQA Guidelines Section 15064.4(b).

- **RPS Program and SB 2X:** The California RPS program (Updated under Senate Bill 2X) requires both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50 percent renewables by 2030. In 2019, LADWP indicated that 34 percent of its electricity came from renewable resources in Year 2016. Electricity GHG emissions provided above in Table 11 on page 153 assume that LADWP will receive at least 33 percent of its electricity from renewable sources by the year 2020 and 50 percent by the year 2030 (with a straight line interpolation for the Project buildout year of 02027) consistent with SB 350. The CalEEMod default carbon intensity for electricity generated by LADWP (pounds of CO_2e per MWh) is based on a year 2007 renewables portfolio of 8 percent and was therefore updated within CalEEMod to reflect the year 2022 renewables portfolio. It is noted that under recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026 and, 60 percent by 2030, and 100 percent by 2045. The Project complies with these percentage renewable requirements inasmuch as the Project is served by LADWP, which is committed to achieving the increase in renewable energy resources by the required dates. Given LADWP's progress towards meeting and exceeding the established targets, as well as potential penalties for non-compliance, it is assumed LADWP will comply.

- **SB 350:** As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would further support this action/strategy because it includes energy-efficient light-emitting diode (LED) lighting for the Project.

- **Cap-and-Trade Program:** As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electric service providers and not directly to the Project. That being said, while not quantified in this analysis, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project's electricity usage per year presented in Table 11 on page 153 would indirectly be covered by the Cap-and-Trade Program.

- **Advanced Clean Cars Program:** CARB approved the Advanced Clean Cars Program in 2012 which establishes an emissions control program for model year 2017 through 2025 and increasing the number of zero emission vehicles manufactured in the 2018 through 2025 model years. Standards under the Advanced Clean Cars Program apply to all passenger and light duty trucks within California and indirectly used by employees and deliveries to the Project. Mobile source GHG emissions provided in Table 11 on page 153 conservatively do not include this additional 34 percent reduction in mobile source emissions as the CalEEMod model default fleet mix for the Air Basin does not yet account for this regulation. The Project would further support this regulation by allocating 10 percent of the total parking spaces with EV charging stations and 30 percent of total parking spaces would be capable of supporting future EVSE.

- **Low Carbon Fuel Standard (LCFS)**: The current LCFS requires a reduction of at least 7.5 percent in the carbon intensity (CI) of California's transportation fuels by 2020. CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030. As discussed previously, the CalEEMod model does not take into account the more recent updates to LCFS. The Project's emissions inventory conservatively does not take credit for additional GHG reductions due to the more recent

LCFS requirements, but this additional 10-percent reduction in CI would indirectly reduce the Project's mobile source emissions.

- **California Integrated Waste Management Act of 1989:** The regulation requires each jurisdiction's source reduction and recycling element to include a diversion of 50 percent of all solid waste by 2000. AB 341 (2011) amended the regulation to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter. The Project would comply with these percentage recycling requirements inasmuch as the Project is served by the City of Los Angeles, which currently achieves a diversion rate of 76 percent.[96] Project-related GHG emissions from solid waste generation provided in Table 11 on page 153 includes a 76-percent reduction in solid waste generation source emissions consistent with the minimum diversion rate required for the City of Los Angeles (CalEEMod default diversion rate is zero percent). The Applicant must also only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. Consistent with CalGreen requirements, the Project would recycle and/or salvage at least 65 percent of non-hazardous construction and demolition debris, and the Applicant would prepare a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials would be sorted on-site or comingled.

Applicable Scoping Plan Measures

Further evaluation of project design features and specific applicable polices and measures in the Scoping Plan is provided below. As shown below, the Project would not conflict with the policies included in the Scoping Plan.

- **Energy Independence and Security Act of 2007 (EISA):** EISA requires phasing out of incandescent light bulbs sold in the United States resulting in 25 percent greater light bulb efficiency in 2014 and 200 percent greater efficiency in 2020. CalEEMod does not incorporate this nationwide reduction in electricity usage associated with lighting. The Project would not conflict with this requirement as the Project would incorporate energy-efficient light-emitting diode (LED) lighting throughout the Project. Electricity GHG emissions provided in Table 11 on page 153 account for LED lighting electricity consumption.

- **CCR, Title 24, Building Standards Code:** The 2019 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The Project would not conflict with the regulatory requirements as the Project must comply with applicable provisions of the 2020 Los Angeles Green Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The Project would further support this regulation since the Project would incorporate energy-efficient LED lighting throughout the Project, reducing overall energy usage compared to baseline conditions. In addition, lighting and energy usage for new structures would comply with Title 24 standards.

- **Assembly Bill 1109 (AB 1109):** The Lighting Efficiency and Toxic Reduction Act establishes standards structured to reduce average statewide electrical energy consumption by not less

[96] City of Los Angeles Zero Waste Progress Report, March 2013.

than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.[97] The Project would not conflict with the requirements under AB 1109 because it complies with local and state green building programs and incorporates energy-efficient LED lighting throughout the Project.

- **Senate Bill (SB) 375:** SB 375 requires integration of planning processes for transportation, land use and housing. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. As discussed under Item XVII, Transportation and in the Transportation Assessment included in Appendix L of this SCEA, the Project's increased square footage would result in an increase in daily trips and VMT. As shown in Appendix L, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a 26-percent reduction in overall VMT and resultant GHG emissions compared to the unadjusted baseline ITE trip generation rates and LADOT VMT Calculator. The Project's reduction in VMT compared to a Project without reduction features would support the goals of the 2020–2045 RTP/SCS. Therefore, the Project would be consistent with SB 375, the reduction in passenger vehicle GHG emissions per capita goals provided in the 2020–2045 RTP/SCS, and with CARB's updated 2035 target.

- **Senate Bill (SB) X7-7:** The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment. The Project would comply with the City of Los Angeles Green Building Code which requires a 20 percent reduction in water usage.

- **CARB In-Use On-Road Regulation:** CARB's in-use on-road heavy-duty vehicle regulation (Truck and Bus Regulation) applies to nearly all privately and federally owned diesel fueled trucks and buses with a gross vehicle weight rating greater than 14,000 pounds. Construction contractors working on the Project site would be required to comply with this regulation.

SCAG 2020–2045 RTP/SCS

SCAG's 2020–2045 RTP/SCS, adopted on September 3, 2020, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of

[97] AB 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534

congestion would be less difficult to navigate due to cordon pricing, and using an electric vehicle will be easier thanks to an expanded regional charging network.

The goals and policies of the 2020–2045 RTP/SCS that focus on reducing VMT feature transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities such that there is access to high quality transit service. Priority Growth Areas, which include HQTAs, Job Centers, Transit Priority Areas (TPAs), NMAs, Livable Corridors, and Spheres of Influence (SOIs), will account for less than 4 percent of regional total land but are projected to accommodate 64 percent of future household growth and 74 percent of employment growth between 2020 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's PGAs, including HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[98] Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

With regard to individual developments, such as the Project, the strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency. The Project's consistency with these general categories of strategies and policies are each discussed below.

Consistency with Integrated Growth Forecast

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.[99] By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. HQTAs, will account for 3 percent of regional total land, but are

[98] SCAG, Final 2020–2045 RTP/SCS, Making Connections, p. 5, May 7, 2020.

[99] 2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.

projected to accommodate 46 percent and 50 percent of future household and employment growth respectively between 2012 and 2040. The overall land use pattern in the 2020–2045 RTP/SCS reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practices in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

Consistent with the SCAG's RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide residents and employees with convenient access to public transit, which would facilitate a reduction in VMT and corresponding vehicular GHG emissions. The Project would concentrate new development within 0.5 mile (walking distance) of bus lines serviced by Metro and LADOT Downtown Area Shuttle (DASH) bus lines with connections to the Metro B (Red) Line at the Universal City Station. The bus lines on Ventura Boulevard adjacent to the Project Site are part of Metro's NextGen Bus Plan (approved in October 2020), which focuses on improving speed, frequency, reliability, and accessibility of the City's bus system.[100] As part of the NextGen Bus Plan, Metro Bus Line 750 and a segment of Metro Bus Line 150 were consolidated with Metro Bus Line 240 to operate more frequent service along Ventura Boulevard, which services the Project Site. Currently, Metro's Bus Line 240 provides average headways of 12 minutes during the weekday morning and afternoon peak periods, and when Metro's NexGen Bus Plan is fully implemented, headways are expected to be 10 minutes during the weekday morning and evening peak commute times as well as during the midday hours, in both directions. Thus, residents and employees are provided with an alternative to single-occupant vehicle travel that would facilitate a reduction in VMT and corresponding vehicular GHG emissions. As such, the Project's location provides some opportunities for the use of public transit to reduce vehicle trips. Moreover, the Project would represent a development within an existing semi-urbanized area that would include residential uses near other residential and commercial uses.

As discussed above, the Project would incorporate reduction measures which will reduce VMT in comparison to a Project without reduction features. The Project's estimated VMT reductions would be consistent with regional strategies to reduce transportation-related GHG emissions and would be consistent with and support the goals and benefits of the 2020–2045 RTP/SCS, which seeks improved mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them. The Project represents a development within an existing urbanized area that would concentrate new residential uses within an HQTA and NMA and along a Livable Corridor. The convenient access to public transportation and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

Consistency with VMT Reduction Strategies and Policies

As discussed under Item XI, Land Use and Planning, the Project includes GHG-reducing strategies from the 2020–2045 RTP/SCS that are applicable to the Project. Specifically, and as shown in Table 12 on page 199 in the analysis further below, the Project includes characteristics that are consistent with

[100] Los Angeles County Metropolitan Transit Authority, NextGen Bus Plan, October 2020, www.metro.net/about/plans/nextgen-bus-plan/#documents, accessed October 22, 2021.

strategies identified in the 2020–2045 RTP/SCS, and that would reduce Project trips and VMT as compared to the Project without implementation of VMT reducing measures within the Air Basin as measured by CalEEMod. Such characteristics and VMT reducing measures include developing a mix of residential and commercial uses in close proximity to other residential and commercial uses, because in comparison, a similar project located further away from major residential centers or mass transit would not achieve a similar reduction in VMT. In addition, the Project would include EV parking at the Project Site reducing mobile source GHG emissions.

As discussed above, the Project represents an infill development within an existing urbanized area that would concentrate new residential uses within an HQTA and NMA and along a Livable Corridor. Furthermore, in accordance with Ordinance No. 185,480, the Project would provide bicycle parking spaces as required by the LAMC, in addition to bicycle-serving amenities that would further encourage biking. These project features would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2020–2045 RTP/SCS, with regard to individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. As discussed above, the Project Site would set aside parking spaces with EV charging equipment and spaces that support future EVSE. With the continued retention of these parking spaces under the Project, the Project would support the alternative fueled vehicle policy initiative.

Energy Efficiency Strategies and Policies

The third goal within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. All Project lighting systems would meet current Title 24 Energy Standards through use of LED bulbs which would reduce energy usage and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, reduction of outdoor water use; drip irrigation systems; and water-efficient landscape design including drought tolerant plants. Restroom fixtures would also comply with the City of LA Green Building code which requires a 20-percent reduction in water usage based on the City of LA Plumbing Code. The Project would also use LID techniques to minimize the amount of stormwater that leaves the Project Site.

Land Use Assumptions

At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHGs. In order to assess the Project's potential to conflict with the 2020–2045 RTP/SCS, this SCEA also analyzes the Project's land use assumptions for consistency with those utilized by SCAG in its Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project's consistency with the applicable goals and principles set forth in the 2020–

2045 RTP/SCS is discussed under Item XI, Land Use and Planning, of this SCEA. As shown under Item XI, the Project is consistent with the goals and principles set forth in the 2020–2045 RTP/SCS.

In sum, the Project is a land use development that is consistent with the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.[101] By furthering implementation of SB 375, the Project would support regional land use and transportation GHG reductions consistent with state regulatory requirements. Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2020–2045 RTP/SCS. Overall, the Project would not conflict with the 2020–2045 RTP/SCS, which is intended to reduce GHG emissions.

City of Los Angeles Sustainable City pLAn/City of LA Green New Deal

The Sustainable City pLAn, a mayoral initiative, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. The Sustainable City pLAn provides information as to what the City will do with buildings and infrastructure in their control, and provides specific targets related to housing and development, as well as mobility and transit, including the reduction of VMT per capita and increasing trips made by walking, biking or transit. The Sustainable City pLAn was updated in April 2019 and renamed as L.A.'s Green New Deal. L.A.'s Green New Deal's specific targets, include ensuring 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035; reducing VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050; increasing the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025 and 50 percent by 2035 and has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035.[102]

Although the Sustainable City pLAn/L.A.'s Green New Deal is not directly applicable to private development projects, the Project would generally be consistent with these aspirations as the Project would concentrate a new residential development within a 0.5 mile (walking distance) of the Metro Rapid, Metro Local and LADOT DASH lines. In accordance with Ordinance No. 185,480 and LAMC requirements, the Project would also provide bicycle parking spaces to further encourage biking. Furthermore, the Project would comply with CALGreen, implement various project design features to reduce energy usage, and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAn with regard to energy-efficient buildings and waste and landfills. Therefore, the Project would be consistent with the Sustainable City pLAn.

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[101] As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

[102] City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019 Targets, https://plan.lamayor.org/targets/targets_plan.html, accessed October 20, 2020.

In addition, the Project would use LED lighting to minimize use of electricity and would use native and drought-tolerant plant species in the landscaping to minimize water use. The Project Site will provide parking spaces which are electric vehicle (EV) ready and with EV-charging stations to assist in the reduction of GHG emissions from vehicles. Installation of EV-charging stations would also be consistent with the L.A. Green New Deal goal of increasingly publicly available EV charging infrastructure. These EV charging stations would facilitate trips in zero emission vehicles, resulting in a reduction of GHG emissions.[103] Therefore, the Project would be consistent with the Sustainable City pLAn and the L.A. Green New Deal.

Project Design Features

The Project would implement the following Project Design Feature related to GHG emissions:

GHG-PDF-1: The Project shall prohibit the installation of natural gas-powered hearths (fireplaces) in all residential units.

Conclusion

In conclusion, the Project would not conflict with the emission reduction measures discussed within CARB's Scoping Plan and subsequent updates, particularly their emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan and updates, the Project would use "green building" features consistent with the CalGreen Building Code.[104] As discussed above, the Project would generate only a small number of new vehicle trips that would not result in any VMT impacts, and would also not conflict with SCAG's 2020–2045 RTP/SCS. Furthermore, as detailed above, the Project would use LED lighting to minimize use of electricity, use native and drought-tolerant plant species in the landscaping to minimize water use, and include EV ready and EV-charging stations to assist in the reduction of GHG emissions from vehicles. As such, the Project would comply with the Sustainable City pLAn/L.A.'s Green New Deal.

Overall, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. In addition, in the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project would not generate GHG emissions that may have a significant impact on the environment. Thus, impacts relative to GHG Threshold (a) and GHG Threshold (b) would be less than significant

[103] However, as a conservative assumption, the GHG analysis did not take credit for this reduction.

[104] The Project's GHG emissions inventory does not take into account future regulations and legislation to reduce GHG emissions to achieve carbon neutrality by 2045. However, for all the reasons described above, the Project would support the State's goals of Executive Order B-55-18 as well as AB 32 and SB 32 to achieve carbon neutrality by 2045.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM HAZ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.

b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.

c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/ Operations Plan should include the following:

   – The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. and ensure notification in the event the Coroner is not available.

   – The location of such hazardous materials.

   – An emergency response plan including employee training information.

   – A plan that describes the way these materials are handled, transported and disposed.

d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.

e) Avoid overtopping construction equipment fuel gas tanks.

f) Properly contain and remove grease and oils during routine maintenance of construction equipment.

g) Properly dispose of discarded containers of fuels and other chemicals.

h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.

i) Identify and implement more stringent tank car safety standards.

j) Improve rail transportation route analysis, and modification of routes based on that analysis.

k) Use the best available inspection equipment and protocols and implement positive train control.

l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.

m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.

n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.

o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.

p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.

q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.

Applicability to the Project

As analyzed below, no significant impacts are anticipated in relation to the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials in connection with the Project. Regardless, consistent with PMM HAZ-1, appropriate hazardous materials management protocols would be implemented at the Project Site to the extent applicable during construction and operation, and the Project would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials. Existing regulations are equal to or more effective than PMM HAZ-1. Therefore, PMM HAZ-1 is not incorporated into the Project.

PMM HAZ-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:

a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment;

b) More stringent tank car safety standards;

c) Improved rail transportation route analysis, and modification of routes based on that analysis;

d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control;

e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size;

f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments;

g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that

can provide real-time information in the event of an oil train derailment or accident;

h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.

Applicability to the Project

PMM HAZ-2 includes measures regarding the transport of hazardous materials. No significant impacts are anticipated in relation to the transport of such materials. However, consistent with this SCAG measures, appropriate hazardous materials management protocols would be implemented at the Project Site to the extent applicable during construction and operation. The Project would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, which are equal to or more effective that PMM HAZ-2. As such, this measure is not incorporated into the Project

PMM HAZ-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.

b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.

Applicability to the Project

The Project would not emit or handle hazardous materials in proximity to a school. As such, PMM HAZ-3 is not applicable to the Project.

PMM HAZ-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.

b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes

oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.

c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.

d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.

e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.

f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.

g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.

h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.

i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.

j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.

k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate

federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.

l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.

m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.

n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.

o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

Applicability to the Project

Consistent with PMM HAZ-4, a Phase I ESA was prepared for the Project. Based on the findings of the Phase I ESA, the Project would implement Project Design Features HAZ-PDF-1 and HAZ-PDF-2 to ensure that potential lead-based paint and asbestos containing materials are identified and abated appropriately under applicable state and local regulations prior to demolition of any structures. Furthermore, incorporation of Project Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which consist of site-specific measures outlined in the Phase I ESA prepared for the Project, would ensure that impacts would be reduced to less than significant levels. Furthermore, the Project would implement all applicable hazardous materials management protocols and would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials. Regulatory compliance, incorporation of Project Design Features, and implementation of Project-specific Mitigation Measures would be more effective that PMM HAZ-4, and as such, PMM HAZ-4 is not applicable to the Project.

MM HAZ-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.

b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;

c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation

Applicability to the Project

Consistent with this measure, the Project would implement Project Design Feature TR-PDF-2, which, consistent with current and standard City policy, would require the preparation of and City approval of a Construction Traffic Management Plan to ensure that adequate emergency access is maintained during construction of the Project. Project Design Feature TR-PDR-2 is equal to or more effective than the measures identified in Mitigation Measure PMM HAZ-5. As such, PMM HAZ-5 is not applicable to the Project.

Impact Analysis

The following analysis is based, in part, on the Environmental Site Assessment—Phase I, Preliminary Endangerment Assessment (PEA) Report Format for 12805, 12815, 12825 Ventura Boulevard (Phase I ESA) prepared for the Project by California Environmental, dated July 2021 (Revised April 2022), which is included as Appendix H of this SCEA.

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact.

Construction

Typical of construction activities for development projects, during demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Project Site. However, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), California's Hazardous Materials Release Response Plans and Inventory Law, Unified Hazardous Waste and Hazardous Materials Management Regulatory Program,

Federal and California Occupational Safety and Health Acts, Safe Drinking Water and Toxic Enforcement Act, and California Radiation Control Regulations. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring at other nearby residential and commercial developments. In addition, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, State, and local requirements, such as Federal Resource Conservation and Recovery Act and California Hazardous Waste Control Law and Federal Occupational Safety and Health Act and California Occupational Safety and Health Act. ***Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.***

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant With Mitigation Incorporated. As concluded in the Phase I ESA prepared for the Project and analyzed below, adherence to regulatory requirements and project design features, and implementation of Mitigation Measures outlined below, construction and operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accidents conditions involving the release of hazardous materials into the environment. The Phase I ESA included historical site utilization research and a site reconnaissance to identify potential on-site hazards. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards within the Project Site. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the ASTM Standard Practice as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. Types of RECs can include Historical Recognized Environmental Conditions (HRECs), which are RECs that have been addressed to the satisfaction of the applicable regulatory authority or have met unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls; and Controlled Recognized environmental Conditions (HRECs), which are RECS that have been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

As discussed in the Phase I ESA, by 1927, the Project Site contained several small structures along the western property line with the remainder of the site undeveloped and covered with trees. By 1952, several of these small structures have been removed and several new structures have been developed along Ventura Boulevard. The Sportsmen's Lodge Event Center and Hotel was constructed on the Project Site in 1950, and by 1955 the site consisted of two pools, a restaurant, and a banquet room. According to historical aerial photographs, the Sportsmen's Lodge Hotel appeared in its current configuration by 1964, and has been occupied as such, along with several commercial tenants including retail stores and car rental businesses.

Construction

Hazardous Waste Generation, Handling, and Disposal

As discussed above, during Project demolition, grading/excavation, and building, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Project Site. However, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and managements of hazardous materials. As such, Project construction activities would not create or exacerbate a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of potentially hazardous materials.

Risk of Upset from Recognized Environmental Conditions and Other Site Conditions

At the time of the site reconnaissance for the Phase I ESA, there was no evidence of past use, treatment, storage, disposal, or generation of hazardous substances on the Project Site. The Phase I identified a 2-inch diameter PVC cased groundwater monitoring well that was observed in the asphalt parking lot on the southeast corner of the Project Site, as shown in Figure 14 on page 174. The well was opened and inspected and it appeared to be in relatively good condition. However, the property owner was unaware of the well and it was not accounted for in any of the records researched for the Phase I ESA, and as such, its presence indicates the possibility of a previous groundwater-sampling event and is considered an environmental concern. No other wells were observed on the Project Site.

The Phase I ESA did not identify any HRECs or CRECs in connection with the Project Site. However, three properties within close proximity to the Project Site were found to have some potential degree of environmental risk, including one REC, as shown in Figure 14 and discussed below.

- *Ultimate Cleaners*: Ultimate Cleaners is a dry cleaning business located approximately 100 feet south of the Project Site at 12754 Ventura Boulevard. The business has operated on the property since at least 1990 and has received multiple Notices of Violation and Notices to Comply since that time. Database records and SCAQMD files indicate that the facility used Perchlorotehylene (PCE) dry cleaning equipment on-site from at least 1991 to 2005. Since 2005, the business has used petroleum-based solvents. The use of PCE along with multiple issues related to PCE leaks, poor record keeping, and insufficient staff training indicate that a solvent release may have occurred. Due to the region's shallow groundwater (approximately 15 feet bgs) and the Project Site's close proximity and downgradient location to this property, it is possible that if a release occurred, it may have impacted the Project Site. Thus, it is considered a REC.

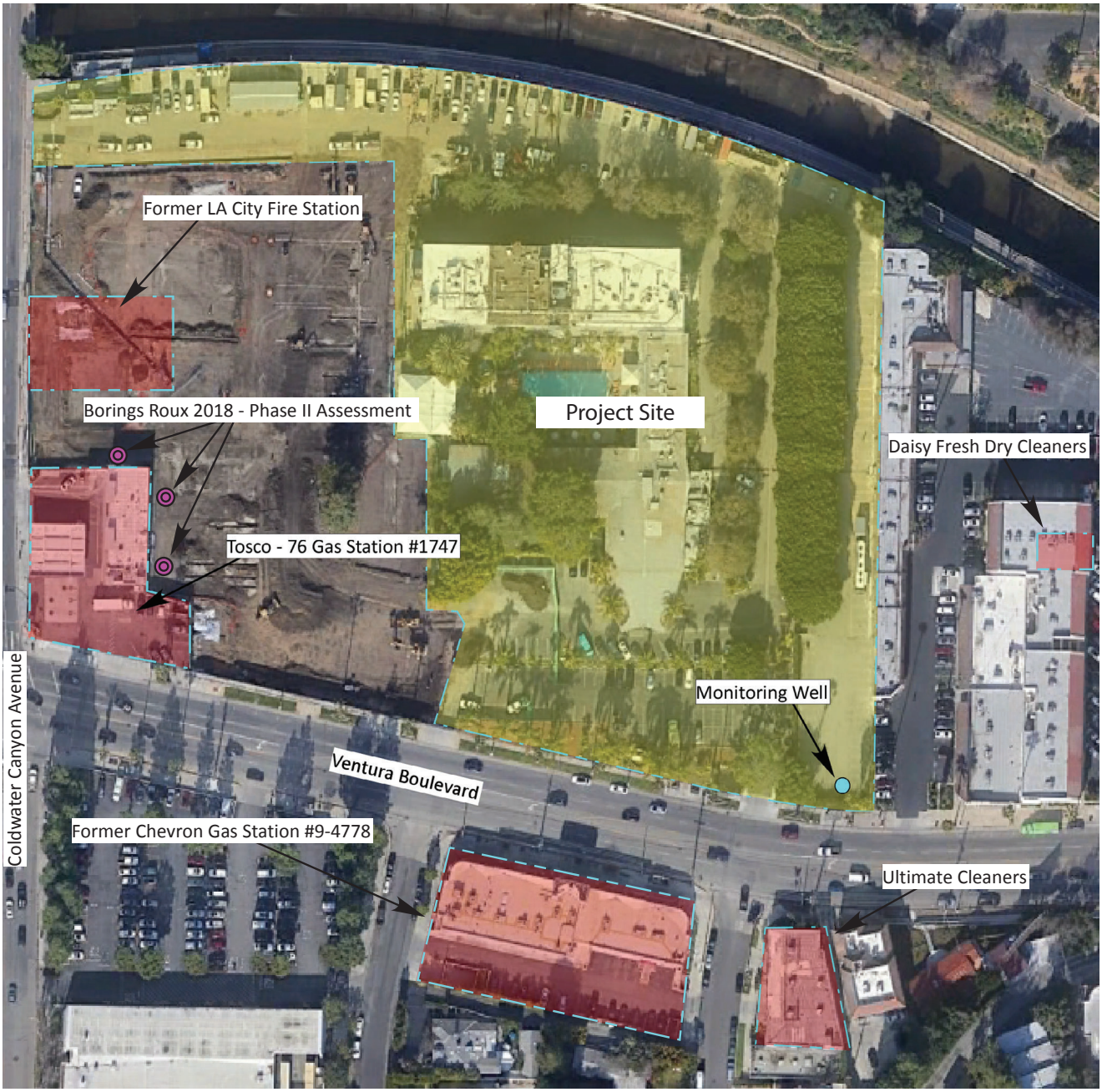

Figure 14
Location of Potential RECs and
Other Conditions in the Project Vicinity

Source: California Environmental, July 2021.

- *Tosco 76 Station*: The Tosco 76 service station is an active gas station located approximately 250 feet west of the Project Site on the northeast corner of Ventura Boulevard and Coldwater Canyon Boulevard. In 1992, four underground storage tanks (USTs) and associated product lines were removed and replaced on the property. Contaminants (i.e., TPH) were detected in soil samples taken during that time, and subsequently, approximately 989 cubic yards of soil was excavated and removed. Additional subsurface investigations and groundwater monitoring that occurred on the property between 1993 and 1998 found additional contaminants, including gasoline and diesel range hydrocarbons, BTEX, and MTBE, in the soils underlaying the property. the LARWQCB approved a Remedial Action Plan (RAP) for the property in 2000, which consisted of a soil vapor extraction system and a groundwater pump and treat system, both of which ran near continuously from 2001 to 2008. The site was granted "No Further Action" (NFA) from the LARWQCB for low-risk closure in 2009. The Tosco 76 station and a former City of Los Angeles Fire Station that was located just north of the gas station along Coldwater Canyon Boulevard were each identified as a REC in a previous Phase I ESA that was prepared for 12825/12833 Ventura Boulevard and 4230 Coldwater Canyon Avenue by Roux Associates, Inc., dated March 28, 2017 (Roux Phase I). The locations of these properties are shown on Figure 14 on page 174. The Tosco 76 station had a known historical release of petroleum products, and groundwater sampling conducted through the mid-2000s showed that the groundwater plume had migrated beneath the Sportsmen's Lodge Event Center, which was located adjacent to the west of the Project Site. The former City Fire Station historically had three USTs on the site.

  These two properties were further evaluated in a Phase II Site Investigation conducted by Roux Associates, Inc, dated May 18, 2017 (Roux Phase II). The Roux Phase II Site Investigation consisted of six borings, identified in Figure 14 on page 174, that were drilled to a maximum depth between 13 and 20 feet bgs, with one extending to 35 feet bgs. Soil samples did not detect levels above method reporting limits for the analyzed compounds, which included total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and gasoline range organics (GROs). In addition, soil gas samples were analyzed for VOCs and GROs. Minor concentration of toluene and 1,2,4-trimethylvenzene were detected from the three borings in the vicinity of the former fire station, and elevated concentrations of PCE, 1,2,4 trimethylbenzene, GRO, benzene, toluene, and ethylbenzene were detected from the soil gas samples from the three borings located adjacent to the gas station. A low concentration of PCE was detected in the groundwater sample. It was concluded in the Roux Phase II ESA that the low concentrations of VOCs and GRO detected in soil vapor and groundwater were consistent with reported and suspected upgradient releases and did not appear to have significantly impacted the subject properties. No further investigation regarding the Tosca 76 station or the former City of Los Angeles Fire Station were recommended by Roux Associates, Inc.

- *Daisy Fresh Dry Cleaners*: Located approximately 150 feet east of the Project Site at 12731 Ventura Boulevard, the property was occupied by the Daisy Fresh Dry Cleaners from at least 1985 to 2009. The database records and SCAQMD file indicate that the facility used PCE in their operations from at least 1985 to 2005. There are no records indicating a release from this property, and it is considered unlikely this this cross-gradient facility has impacted the Project Site.

  In addition, the nearest listed contaminated property to the Project Site a former Chevron service station that was located approximately 100 feet to the south of the Project Site, across Ventura Boulevard. Hydrocarbon-impacted soil was encountered when the property was being redeveloped in 1989, and several site investigations determined that the hydrocarbon impacts extended into groundwater. A Remedial Action Plan (RAP) for the property was approved by the Los Angeles Regional Water Quality Control Board (LARWQCB) in 1989 and

a soil vaper extraction (SVE) system was implemented on the property to remove the contaminants from the soil. Five groundwater monitoring well were installed, including two on the Project Site. The SVE system ran until 1996, with quarterly groundwater monitoring. The final groundwater monitoring event that occurred in the first quarter of 1996 indicated that the contaminant concentration in the groundwater had decreased significantly. Specifically, all the monitoring wells showed non-detectable levels of TPH except for one, which showed approximately one-fifth of the maximum concentration previously detected. Both of the groundwater monitoring wells on the Project Site had non-detectable levels of TPH and low levels of benzene, toluene, and xylene. The former Chevron property received case closure from the LARWQCB in 1996. Thus, due to the low levels of contaminants detected in the groundwater beneath the Project Site, this release is not considered an environmental concern for the Project.

As outlined in the Phase I ESA prepared for the Project, the Project Site is identified on the standard environmental government sources, including HWTS, HAZNET, RCRA NonGen/NLR, EMI, FINDS, and ECHO databases. These listings are associated with small quantities of hazardous waste generated on the Project Site, including asbestos containing material generated during on-site renovations and unspecified solvents that are likely related to common chemicals used in the hotel and restaurant. These listings are not considered an environmental concern. Additionally, there is one 1990 HAZNET listing for 3.1 tons of contaminated soil generated from a site clean-up. Due to the small quantity of soil generated and no other records indicating a cleanup occurring on the Project Site, this is likely associated with a small surface release and is not considered an environmental concern. The Project Site is not listed on databases maintained by the CalEPA DTSC or RWQCB and there are no files maintained by either agency for the Project Site.

Based on the above and as outlined in the Phase I ESA prepared for the Project, two areas of concern were identified relative to the potential risk of upset from RECs or other site conditions. These risks are associated with the Ultimate Cleaners property and the potential for vapor intrusion, and the existence of a groundwater monitoring well on the southeast corner of the Project Site, which indicates the possibility of a release from an adjacent property. The Project would adhere to all applicable regulations regarding soils and groundwater, including SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) and applicable NPDES permit requirements. SCAQMD Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: the excavation of a UST or piping which has stored VOCs; the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; the handling or storage of VOC-contaminated soil (i.e., soil which registers 50 ppm or greater using an organic vapor analyzer calibrated with hexane) at or from an excavation or grading site; or the treatment of VOC-contaminated soil at a facility. SCAQMD Rule 1166 further requires that a copy of the approved mitigation plan be maintained on-site during the entire excavation period and that the SCAQMD executive officer be notified at least 24 hours prior to excavation. In accordance with SCAQMD Rule 1166, monitoring for VOC contamination would occur at least once every 15 minutes and VOC concentration readings would be recorded. If VOC-contaminated soil is detected, the approved mitigation plan would be implemented. As such, compliance with existing regulations would ensure the Project would not create or exacerbate a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of VOC-contaminated soil that may be encountered on-site. With regard to groundwater, as discussed in Section X, Hydrology and Water Quality, below, temporary dewatering operations are expected to be necessary during Project construction. As such, any discharge to groundwater would need to comply with the applicable NPDES permit requirements, which addresses

appropriate treatment and disposal methods. In addition, in addition to compliance with regulatory requirements, Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which address specific site conditions, would be implemented to further ensure that the Project would not exacerbate the risk of upset and accident conditions associated with RECs and other site conditions.

Underground and Aboveground Storage Tanks

According to the Phase I ESA, no evidence of existing aboveground storage tanks (ASTs) or underground storage tanks (USTs), clarifiers, sumps, or grease interceptors were observed on the Project Site. In addition, no other records were found that indicate the presence of any USTs within the areas proposed for construction. In the unlikely event that USTs are found during construction of the Project, they would be removed in accordance with applicable federal, state, and local regulations. Thus, the Project would not exacerbate hazardous conditions related to risk of upset associated with exposure to USTs or ASTs.

Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Thus, a building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or asbestos-containing materials (ACMs). Based on the age of the on-site structure, ACMs may be present on-site. Pursuant to SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), an asbestos survey would be conducted prior to demolition activities, subject to approval by the City of Los Angeles Department of Building and Safety. In the event that ACMs are found, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable federal, state, and local regulations. If required, the Project Applicant shall submit a Hazardous Building Materials Demolition Assessment and Management Plan to the SCAQMD and LAFD for review and approval. Thus, with compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Based on the age of the on-site structure, lead-based paint (LBP) may be present on-site. The on-site building and associated facilities would be demolished. In the event that LBP is found, suspect materials would be managed in accordance with applicable procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. If required, the Project Applicant shall submit a Hazardous Building Materials Demolition Assessment and Management Plan to LAFD for review and approval. Therefore, with compliance with relevant regulations and requirements, the Project would not expose people to a substantial risk resulting from the release of LPB into the environment.

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the USEPA banned the manufacture and sale of PCB-containing transformers. During site reconnaissance, potential PCB-containing equipment was observed, including four vaulted transformers located on the west property line and one on-pole transformer located on the north property line. The vaulted transformers, which are used for the property adjacent to the west of the Project Site, are owned and maintained by the Los Angeles Department of Water and Power (LADWP). The transformers were sealed and not accessible during site reconnaissance and no information with regard to the PCB content of the transformers was available.[105] LADWP maintains responsibility for the transformers, and in the event of a release of dielectric fluid from the transformers, LADWP typically performs the cleanup. In the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations, such as the Toxic Substances Control Act and California Hazardous Waste Control Law. Therefore, with compliance with applicable regulations and requirements, the Project would not exacerbate reasonably foreseeable upset and accident conditions associated with PCBs.

Oil Wells and Methane

A review of the State of California Geologic Energy Management Division (CalGEM) Well Finder determined that no oil fields or oil wells are located within a 2,000-foot radius of the Project Site. In addition, the Project Site is not located within a recognized Methane Hazard Zone or Methane Buffer Zone as mapped by ZIMAS. Therefore, the Project would not exacerbate environmental hazards relative to oil wells or methane.

Operation

Hazardous Waste Generation, Handling, and Disposal

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of residential, retail, and restaurant uses, including cleaning products, paints, and those used for landscape maintenance. All hazardous materials present on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, State, and local requirements, such as Federal Resource Conservation and Recovery Act and California Hazardous Waste Control Law and Federal Occupational Safety and Health Act and California Occupational Safety and Health Act. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant.

Risk of Upset from Recognized Environmental Conditions and Other Site Conditions

As discussed above, the Project Site is identified on the standard environmental government sources, including HWTS, HAZNET, RCRA NonGen/NLR, EMI, FINDS, and ECHO databases, which are

[105] Transformers contain dielectric fluid or mineral oil, which may contain minor amounts of PCB and could be "PCB contaminated" (PCB content of 50 to 500 parts per million).

associated with small quantities of hazardous waste generated on the Project Site, including asbestos containing material generated during on-site renovations and unspecified solvents that are likely related to common chemicals used in the hotel and restaurant. These listings are not considered an environmental concern. Additionally, there is one 1990 HAZNET listing for 3.1 tons of contaminated soil generated from a site clean-up. Due to the small quantity of soil generated and no other records indicating a cleanup occurring on the Project Site, this is likely associated with a small surface release and is not considered an environmental concern. The Project Site is not listed on databases maintained by the CalEPA DTSC or RWQCB and there are no files maintained by either agency for the Project Site. The Project would adhere to applicable regulatory requirements pertaining to the use of hazardous materials, including the maintenance of required inspection logs, manifests, and records. Thus, operation of the Project would not exacerbate the risk of upset and accident conditions associated with RECs and other site conditions

Underground and Aboveground Storage Tanks

According to the Phase I ESA and as discussed above, no evidence of existing USTs or ASTs were observed on the Project Site. It is possible that a future restaurant may include an AST for cooking oil or grease. However, the AST would be operated and maintained in accordance with manufacturer's specifications. The Project does not propose the installation of other USTs or ASTs as part of its operation. Thus, Project operation would not exacerbate hazardous conditions related to risk of upset associated with exposure to USTs or ASTs.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs. Therefore, Project operation is not anticipated to increase the occurrence of or exposure to friable asbestos or ACMs at the Project Site.

Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Therefore, Project operation is not anticipated to increase the occurrence of or exposure to LBP at the Project Site.

Polychlorinated Biphenyls

In accordance with existing regulations that ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs, and operation of the Project would not expose people to any risk resulting from the release of PCBs into the environment

Oil Wells and Methane

The Project does not include the installation of new oil wells. As such, operation of the Project would not exacerbate the risk of upset and accident conditions associated with operation or re-abandonment of oil wells. In addition, the Project is not located within a recognized Methane Hazard Zone or Methane Buffer Zone as mapped by ZIMAS. Thus, operation of the Project would not exacerbate environmental hazards relative to oil wells or methane.

Mitigation Measures

The following mitigation measures are provided to reduce Project impacts related to the release of hazardous materials into the environment:

HAZ-MM-1: Prior to construction of the Project, a gas screening survey shall be conducted to evaluate the level of volatile organic compounds (VOCs) in the soil gas beneath the Project Site to determine if the levels exceed current regulatory guidance concentrations. Based on the findings, any impacted soil shall be removed and disposed of in accordance with SCAQMD Rule 1166. The gas screening survey will also analyze whether there is the potential for release of vapors from potentially contaminated groundwater and, if required, the Project will comply with applicable regulations, including the installation of a vapor barrier or membrane to address any vapor release.

HAZ-MM-2: Prior to construction of the Project, the existing groundwater monitoring well located in the southeast portion of the Project Site shall be sampled to evaluate the origin(s) of volatile organic compounds (VOCs) in soil gas and subsequently abandoned under a permit issued by the Los Angeles County Health Department.

Based on the above, with adherence to regulatory requirements and project design features, which are consistent with the measures identified under Mitigation Measure PMM HAZ-4, and implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, construction and operation of the Project would not exacerbate the risk of upset and accident conditions associated with the release of hazardous materials into the environment. Therefore, impacts associated with hazardous waste generation, handling, and disposal during construction and operation of the Project would be less than significant with mitigation.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are no schools located within a 0.25-mile radius of the Project Site. The nearest school is Harvard-Westlake Upper School located approximately 0.42 mile south of the Project Site. As discussed above, the types and amounts of hazardous materials that would be used in connection with construction of the Project would be typical of those used during construction of residential and commercial developments and would include vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and State Occupational Safety and Health Act requirements, and would not create a significant hazard to nearby schools. ***The Project would not involve the use, handling or disposal of acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school, and impacts would be less than significant.***

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA. As discussed above, the Project Site is identified on the standard environmental government sources, including HWTS, HAZNET, RCRA NonGen/NLR, EMI, FINDS, and ECHO databases. These listings are associated with small quantities of hazardous waste generated on the Project Site, including asbestos containing material generated during on-site renovations and unspecified solvents that are likely related to common chemicals used in the hotel and restaurant. These listings are not considered an environmental concern. Additionally, there is one 1990 HAZNET listing for 3.1 tons of contaminated soil generated from a site clean-up. Due to the small quantity of soil generated and no other records indicating a cleanup occurring on the Project Site, this is likely associated with a small surface release and is not considered an environmental concern. ***The Project Site is not listed on databases maintained by the CalEPA DTSC or RWQCB and there are no files maintained by either agency for the Project Site. Thus, based on the above analyses, while the Project is identified on standard government sources that monitor hazardous materials, conditions on the Project Site would not create a significant hazard to the public or the environment, and impacts would be less than significant.***

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project Site is not located within 2 miles of an airport or within an airport planning area. The closest private airstrip or airport is the Bob Hope Airport, which is approximately 4.65 miles northeast of the Project Site. ***Given the distance between the Project Site and this airport, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise. No impact would occur.***

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The nearest disaster routes to the Project Site are Ventura Boulevard, which is adjacent to the southern boundary of the Project Site, the US-101, which is approximately 0.76 mile north of the Project Site, and Laurel Canyon Boulevard, which is approximately 0.92 mile east of the Project Site.[106,107] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the Project's Construction Traffic Management Plan, as outlined in Project Design Feature TR-PDF-2. The Construction Traffic Management Plan would ensure that adequate emergency access is maintained and

[106] City of Los Angeles, GeoHub, https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore, accessed August 15, 2022.

[107] County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Valley Area, September 2012.

that through-access for drivers, including emergency personnel, along all roads would still be provided during construction. Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. ***Therefore, the construction and operation of the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan, and impacts would be less than significant.***

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The Project Site is located within Very High Fire Hazard Severity Zone (VHFHSZ),[108] as established by LAMC Section 57.4908. However, the Project Site is located in an urbanized area and is not adjacent to any dense wildland areas. In addition, the Project Site has been previously developed with urban uses and ornamental landscaping. Nevertheless, due to the Project Site's location within a VHFHSZ, the Project is subject to certain requirements intended to reduce the potential for wildland fires, including brush clearing regulations, greenbelt requirements, and the use of fire-resistant materials that reduce the potential for wildland fires to spread. These requirements are outlined in detail under Item XX, Wildfire, below. Additionally, standard fire protection devices, including fire hydrants and sprinklers, would be incorporated as part of the Project, and appropriate emergency evacuation procedures would be adopted to ensure the safety of residents, employees, and visitors to the Project Site. Furthermore, as stated above, the Project would comply with all applicable federal, State, and local requirements concerning the use, storage, management, handling, and disposal of hazardous materials, which would reduce the potential for Project construction activities to result in the release or explosion of a hazardous material that may ignite a fire in the area. ***Therefore, based on the Project Site's location in a developed area and with compliance with the requirements of LAMC and implementation of any additional measures identified by LAFD, Project construction and operation would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.***

Cumulative Impacts

Less Than Significant Impact. Development of the Project in combination with the five related projects listed in Table 35 on page 329 and Figure 16 on page 330 in the analysis further below has the potential to increase the risk of an accidental release of hazardous materials. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, LBP, PCBs, and oil and gas, and would be required to comply with all applicable local, state, and federal laws, rules and regulations, as discussed above for the Project. Because environmental safety issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. **Therefore, with full compliance with all applicable local, state, and federal laws, rules and regulations, as well as implementation of site-specific recommendations for the related projects and the Project, significant cumulative impacts related to hazards and hazardous**

[108] City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 2375021027, 2375021028, and 2375021029, http://zimas.lacity.org/, accessed June 4, 2021.

materials would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM HYD-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such

measures may include the following or other comparable measures identified by the Lead Agency:

a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.

b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.

c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.

d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.

e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.

f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse:

g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.

h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.

i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.

j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.

k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.

l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.

m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.

Applicability to the Project

Consistent with PMM HYD-1, and as described below, the Project would comply with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, MS4 permit, CWA, City stormwater ordinances) related to stormwater runoff and water quality. Conformance with applicable regulations would be ensured during the City's building plan review and approval process for the Project. Compliance with these regulatory requirements, which are equal to or more effective than Mitigation Measure PMM HYD-1, would ensure that the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, PMM HYD-1 is not applicable to the Project.

PMM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Avoid designs that require continual dewatering where feasible.

For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.

a) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.

b) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.

c) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.

Applicability to the Project

Consistent with PMM HYD-3, should the Project require temporary or permanent dewatering as anticipated, it would be conducted in compliance with all applicable regulatory requirements regarding water quality. In addition, since the Project Site is currently developed and provides little groundwater recharge potential, the construction of the Project would not substantially impact the amount of groundwater recharge occurring on-site. These regulatory compliance measures would be equal to or more effective than Mitigation Measure PMM HYD-2. Thus, PMM HYD-2 is not applicable to the Project.

PMM HYD-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and

feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.

Applicability to the Project

As discussed below, the Project Site is not located in a flood zone and would not impede or redirect flood flows. Therefore, Mitigation Measure HYD-8(b) is not applicable to the Project.

Impact Analysis

The following analysis is based, in part, on the Sportsmen's Lodge Residential Phase: Hydrology and Water Quality Report (Hydrology and Water Quality Report) prepared for the Project by KPFF Consulting Engineers, dated July 2022 and included as Appendix I of this SCEA.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact.

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. As Project construction would disturb more than one acre of soil, the Project would be required to retain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a SWPPP with the State, which would specify BMPs and erosion control measures to be used during construction of the Project to manage runoff flows and prevent pollution. The Project would be required by the City of Los Angeles to put in place an erosion control plan (Local SWPPP) for the full duration of Project construction activities. The NPDES and SWPPP measures would be designed to contain and treat, as necessary, stormwater and construction watering for dust reduction on the Project Site to prevent runoff from impacting off-site drainage facilities or receiving waters. BMPs could include, but not be limited to, sand bag barriers, inlet protection, regular street sweeping, controlled entrance/exit with rumble plates, dust control, and designated staging areas for materials and equipment. Site=-specific BMPs, which will be implemented when construction commences, prior to site clearing and grubbing or demolition activities, would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control

plan, to reduce the effects of sedimentation and erosion. Therefore, with compliance with NPDES requirements, including site-specific BMPs, and City grading regulations, construction of the Project would not violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated. Thus, temporary construction-related impacts on surface water quality would be less than significant.

Operation

Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for at least the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use system BMPs to collect and store the first flush of stormwater runoff to satisfy LID Manual requirements, which would then be used for landscape irrigation.

As is typical of most urban existing uses and proposed developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, trash, bacteria, nutrients, organics, pesticides, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. The existing site is approximately 90-percent impervious and consists of buildings, paved surface lots, and minimal landscape areas. Implementation of the Project would decrease the impervious surfaces to approximately 75-percent. As discussed in the Hydrology and Water Quality Report included as Appendix I of this SCEA, existing underground storm drain facilities in the Project vicinity consist of six catch basins located directly south of the intersection of Ventura Boulevard and Coldwater Canyon Avenue, one catch basin along the Sportsmen's Lodge frontage on Coldwater Canyon Avenue approximately 250 feet north of Ventura Boulevard, and one catch basin at the Sportsmen's Lodge property approximately 260 feet from Coldwater Canyon Avenue and adjacent to the Los Angeles River. These catch basins, which are owned and operated by the City of Los Angeles, collect and discharge the stormwater into the Los Angeles River. The Project Site is currently defined as two drainage areas, and the site does not implement BMPs or have means of treatment for stormwater runoff. The Project would improve this condition by complying with the LID standards for capturing the first flush of stormwater rather than it being disposed directly to the public storm drain system. Specifically, the Project Site would consist of four drainage areas that would drain via building roof drains, surface flow, and subterranean drainage to the proposed BMPs. The captured stormwater would be routed via building and site conveyance pipes and would be connected to the LID system. This runoff area will be captured by two proposed rain cisterns from the series of six rainwater cistern tanks that would be provided on-site to provide capture and reuse system for the Project. Therefore, with the incorporation of such LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Thus, impacts to surface water quality during operation of the Project would be less than significant.

Groundwater Quality

Construction

Construction activities for the Project would include demolition of existing buildings and a surface parking lot and excavation to a depth of 52 feet below ground surface. As provided in the Geotechnical Investigation included as Appendix F of this SCEA, the historically highest groundwater level is 5 to 10 feet below ground surface. Thus, Project construction activities are expected to encounter groundwater and temporary dewatering is anticipated.[109] Temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements, and the treatment and disposal of the water would occur in accordance with the requirements of the LARWQCB Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

In addition, during on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives could be used and would therefore require proper management and disposal to prevent hazardous materials from being released into groundwater. Compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater.

Thus, based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant.

Operation

Operational activities from a development project that could affect groundwater quality are typically spills of hazardous materials and leaking USTs. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. However, as discussed above, the Project would not include any new USTs that would have the potential to expose groundwater to contaminants. In addition, while the development of new building facilities could slightly increase the use of on-site hazardous materials as described above, compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, as described above, the Project would include the installation of a capture and use system to treat and dispose of the volume of water produced by the greater of the 85th percentile storm or the 0.75 -inch storm event, which would allow for the treatment of the on-site stormwater prior to using it for irrigation. The Project also does not include the installation or operation of water wells, or any extraction or recharge system.

[109] Dewatering involves the discharge of non-stormwater (i.e., groundwater) that must be removed from a work location and discharged into the storm drain system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not treated, can lead to exceedance of the NPDES requirements.

Therefore, operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality.

Overall, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality. Furthermore, as described above, the Project would comply with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, MS4 permit, CWA, City stormwater ordinances) related to stormwater runoff and water quality. Conformance with applicable regulations would be ensured during the City's building plan review and approval process for the Project. Through compliance with these regulatory requirements, implementation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, the Project's impacts will be less than significant.

Overall, as analyzed above, the construction or operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Thus, impacts would be less than significant.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact.

Construction

There are two groundwater production wells or supply wells within one mile of the Project Site.[110] However, construction activities would not be anticipated to affect existing wells, nor would the Project include the construction of water supply wells. Development of the Project would include excavations to a maximum depth of 52 feet below ground surface. As provided in the Geotechnical Investigation included as Appendix F of this SCEA, historical groundwater levels are approximately 5 to 10 feet below ground surface. Therefore, dewatering is anticipated during construction activities for the Project. Due to the limited and temporary nature of dewatering operations, impacts to groundwater supplies and management of the basin would not be considered significant. Construction of the Project will comply with appropriate building codes and standard practices. Furthermore, the treatment and disposal of the dewatered water would occur in accordance with the requirements of LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. In addition, 90 percent of the Project Site is currently impervious and does not allow for groundwater recharge. Therefore, construction of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the Basin.

[110] Los Angeles County Department of Public Works, Groundwater Wells, https://dpw.lacounty.gov/general/wells/#, accessed June 4, 2021.

Operation

As previously discussed, the Project Site is currently approximately 90 percent impervious with little to no groundwater recharge potential. The Project would provide a considerable amount of landscaping and would decrease the amount of impervious surface on the Project Site to approximately 75 percent, thereby improving the potential for groundwater recharge. Furthermore, the Project's BMPs, as described above, would capture stormwater from the developed portions of the Project Site to be used for landscaping irrigation. Thus, the majority of the stormwater runoff would be retained on-site. The stormwater that bypasses the capture and use system would discharge to the Los Angeles River and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. Should the Project require temporary dewatering, it would be conducted in compliance with all applicable regulatory requirements regarding water quality. In addition, since the Project Site is currently developed and provides little groundwater recharge potential, operation of the Project would not substantially impact the amount of groundwater recharge occurring on-site. As such, through adherence with regulatory compliance measures, operation of the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Overall, construction and operation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, and impacts during construction and operation of the Project would be less than significant.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. The Project Site is not crossed by any water courses or rivers. However, the Los Angeles River runs adjacent to the northern boundary of the Project Site. Construction activities for the Project would include demolition of the existing buildings and surface parking lot, excavating down approximately 52 feet for subterranean parking, building up of the structure, and constructing hardscape and landscape around the building. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements and a Local SWPPP that include implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to erosion and siltation would be less than significant.

As previously discussed, the Project Site is currently comprised of approximately 90-percent impervious surfaces under existing conditions. At buildout of the Project, the Project Site would be comprised of approximately 75-percent impervious areas. Accordingly, there would be a limited potential for erosion or siltation to occur from exposed soils. The Project would include BMPs that would address drainage flows and would ensure that substantial soil erosion or siltation does not occur. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur.

Overall, the Project would comply with all applicable regulatory requirements, including the LAMC's grading requirements regarding erosion control and state and local requirements regarding stormwater management. Through compliance with these regulatory requirements, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site. Thus, impacts would be less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact. As indicated above, the Los Angeles River runs immediately north of the Project Site. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs and erosion control measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. As such, construction-related impacts to flooding would be less than significant.

In addition, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). As discussed above and in the Hydrology and Water Quality Report included as Appendix I of this SCEA, infiltration is not considered feasible at the Project Site. Thus, the Project would implement capture and use systems to collect and store the first flush of stormwater runoff to satisfy LID requirements and use it for irrigation. A series of six rainwater cistern tanks will be provided on-site to provide capture and reuse system for the Project. Each tank will be located either around the open space or subgrade parking and provide for the proposed drainage areas. Thus, operational impacts to flooding would be less than significant.

Overall, with implementation of BMPs and compliance with applicable regulatory requirements including the LAMC's grading requirements regarding erosion control and state and local requirements regarding stormwater management, the Project would not increase the rate or

amount of surface runoff in a manner that would result in flooding on- or off-site. Thus, impacts would be less than significant.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. As discussed above, the Project would result in a decrease in the imperviousness of the Project Site. As detailed in the Hydrology and Water Quality Report, a comparison of the pre- and post-Project peak flow rates indicates a decrease in overall stormwater runoff from the Project Site. However, a comparison of the pre- and post-Project flow rate for the 50-year design storm event indicates an increase in stormwater runoff from the Project Site to Coldwater Canyon Avenue due to the redirection of stormwater that previously flowed directly to the Los Angeles River. As outlined in the Hydrology and Water Quality Report, the current capacity of the curb and gutter system in Coldwater Canyon Avenue is adequately sized to accommodate the increase in flow. In addition, compliance with the LID requirements would ensure stormwater treatment with post-construction BMPs that are required to control pollutants associated with events up to the 85th percentile storm event, per the City's Stormwater Program. In order to comply with these LID requirements, approximately 19,062 cubic feet (142,590 gallons) of stormwater would need to be threated throughout the Project Site. Six cisterns, each with a capacity of 25,000 gallons, would be provided to capture and temporarily store stormwater, until it is used through the irrigation systems, per the capture and use system. Thus, the BMPs that would be implemented as part of the Project, which are currently not implemented on the Project Site, would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. ***Consequently, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and impacts would be less than significant.***

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.[111,112] The Project Site is located in Zone X of the FEMA Flood Insurance Rate Map (FIRM). Zone X is characterized as an area of minimal flood hazard and having a less than 0.2 percent annual chance for a flood. In addition, as discussed above, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. ***Thus, the Project would not impede or redirect flood flows, and no impact would occur.***

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. The discussion is focused on whether the Project would place housing in a 100-year flood zone; or be located within a 100-year flood zone, which would impede or redirect flood flows. A significant impact may occur if a Project exposes people or structures to a significant risk or loss

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111 Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1320F, effective September 26, 2008.

112 Los Angeles General Plan Safety Element, 2021; Local Hazard Mitigation Plan, Figure 10-6—Mapped Flood Hazard Areas in South Valley APC, p. 10-13.

or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure. In addition, a significant impact may occur if a Project Site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

Flood Hazard Areas

As previously discussed, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. The Project Site is located in Zone X of the FEMA Flood Insurance Rate Map (FIRM).[113] Zone X is characterized as an area of minimal flood hazard, usually depicted on FIRMs as above the 500-year flood level. In addition to the low risk of flooding, the Project would implement capture and use BMPs to retain stormwater runoff on-site, as described above. Thus, impacts would be less than significant.

Dam Failure

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the Geotechnical Investigation, the Project Site is located within the Sepulveda Dam, Lopez Dam, and Los Angeles Damn inundation areas. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. These dams, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Specifically, the California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, LADWP operates the dams in in the Project Site area and mitigates the potential for over flow and seiche hazard through control of water levels and dam wall height. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. The City's Local Hazard Mitigation Plan, which was adopted in July 2018, provides a list of existing programs, proposed activities and specific projects that may assist the City in reducing risk and preventing loss of life and property damage from natural and human-cause hazards including dam failure. The Hazard Mitigation Plan evaluation of dam failure vulnerability classifies dam failure as a medium risk. Given the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant. Additionally, as discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater. Thus, existing regulatory requirements and dam safety protocols would ensure that the Project Site is safe from dam failure. As such, impacts would be less than significant.

[113] Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1320F, effective September 26, 2008.

Seiche, Tsunami, Mudflow

There are no standing bodies of water near the Project Site that may experience a seiche. In addition, the City of Los Angeles 2018 Local Hazard Mitigation Plan, which is part of the 2021 Safety Element of the City of Los Angeles General Plan, does not map the Project Site as being located within a tsunami inundation zone. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Also, the Project Site is not located in an area identified to have potential for seismic slops instability or in the path of any known or potential landslides. As such, the Project would not be vulnerable to seiche, tsunami, or mudflow and impacts would be less than significant.

Overall, the Project would not risk release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone, and impacts would be less than significant.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Hydrology Report, the Project Site is located within the Los Angeles River Reach 3. Pollutants of concern listed for the Los Angeles River under California's Clean Water Act Section 303(d) List include: Cadmium (dissolved), Lead (dissolved), Chlordane, Dichloroethylene, Tetrachloroethylene, Trichloroethylene, Coliform Bacteria, Copper (dissolved), Total Aluminum, Total Lead, Enterococcus, Fecal Coliform, Total Coliform, Algae, Ammonia, Oil and Grease, Zinc (dissolved), and trash. No Maximum Daily Load (TMDL) data have been recorded by EPA for this waterbody.

The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the TMDL milestones.[114] The objective of the EWMP Plan for the Upper Los Angeles River Watershed is to determine the network of control measures (often referred to as best management practices) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices.[115]

Potential pollutants generated by the Project would be typical of commercial and residential land uses and may include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not currently have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As

[114] California State Water Resources Control Board, Watershed Management Programs, www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/index.html, accessed February 9, 2021.

[115] Enhanced Watershed Management Program (EWMP) for the Upper Los Angeles River Watershed, January 2016.

such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Upper Los Angeles River Watershed.

Overall, with compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Accordingly, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The related projects comprise a variety of uses, including residential, commercial/retail, mixed-use, and a park and gymnasium. The Project and all of these related projects, as well as other development projects in the area, would be required to comply with applicable regulatory requirements regarding drainage and water quality, including implementation of a SWPPP and BMPs, conformance with NPDES permit conditions, and a LID or Standard Urban Stormwater Mitigation Plan, which would reduce impacts to a less than significant level. Furthermore, the Project would not result in any water quality related impacts and would not increase peak stormwater flows from the Project Site. ***Therefore, the Project would not contribute to a cumulative impacts regarding hydrology and water quality.***

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM LU-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Facilitate good design for land use projects that build upon and improve existing circulation patterns

b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:

– Selecting alignments within or adjacent to existing public rights of way.

- Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
- Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).

c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:

- Alignment shifts to minimize the area affected.
- Reduction of the proposed right-of-way take to minimize the overall area of impact.
- Provisions for bicycle, pedestrian, and vehicle access across improved roadways.

Applicability to the Project

As described under Land Use Threshold (a) below, the Project would not physically divide an established community. Therefore, Mitigation Measure PMM-LU-1 is not applicable to the Project

PMM LU-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.

Applicability to the Project

As outlined in the impact analysis under Land Use Threshold (b) below, the Project would not physically divide an established community or create a significant environmental impact due to a conflict with the 2020–2045 RTP/SCS, LAMC, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, Ventura–Cahuenga Boulevard Corridor Specific Plan, or the City of Los Angeles General Plan. Therefore, Mitigation Measure LU-2 is not applicable to the Project.

Impact Analysis

a. Would the project physically divide an established community?

No Impact. The Project Site is generally bounded by the Los Angeles River to the north, Ventura Boulevard to the south, Coldwater Canyon Avenue to the west, and commercial uses to the east. The Project Site is currently developed with the Sportsmen's Lodge Hotel, associated facilities, and surface

parking. The Project Site is located within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area. The Project Site has a General Plan land use designation of Other Public Open Space, Open Space, and Neighborhood Office Commercial. The area surrounding the Project Site is developed primarily with a mix of commercial, open space, and residential uses. Specifically, land uses located adjacent to the Project Site include the Los Angeles River to the north and residential uses north of the River. Adjacent to the west of the Project Site is the Shops at Sportsmen's Lodge commercial project with restaurant, retail, and health club uses that recently completed construction and has received a temporary certificate of occupancy, and a gas station. To the south of the Project Site, across Ventura Boulevard, is a large-scale grocery store and a pet store. Mid-rise office buildings and low-rise retail and restaurant buildings are located further east along Ventura Boulevard, and open space associated with a golf and tennis club is located further east of the Project Site, north of the Los Angeles River.

The Project would demolish the existing buildings on the Project Site and develop 18,019 square feet of restaurant uses, 27,926 square feet of retail uses, 540,900 square feet of residential uses (providing for approximately 520 residential units), and 64,151 square feet of residential amenity and accessory space. The proposed uses would be located within three low- to mid-rise buildings referred to as Building 1, 2, and 3, respectively. These uses would be consistent with other residential and commercial developments located adjacent to and in the general vicinity of the Project Site. All proposed development would also occur within the boundaries of the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. ***Therefore, the Project would not physically divide an established community and no impact would occur.***

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that regulate land use or guide land use decisions pertaining to the Project Site.

A project is considered consistent with the provisions and general policies of applicable City or regional land use plan and regulation if it is consistent with the overall intent of the plan or regulation and would not preclude the attainment of its primary goals.[116] More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

Various local and regional plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies of SCAG's RTP/SCS, the City's General Plan (including the Framework Element, the Housing Element, Conservation Element, and Mobility Plan 2035), the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, the Ventura–Cahuenga Boulevard Corridor Specific Plan, and the LAMC, to the extent

[116] *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th.704, 719.

that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect. The Project's consistency with certain other goals, objectives, and policies that do not directly relate to the avoidance or mitigation of environmental effects is also briefly discussed for informational purposes.

Southern California Association of Governments

Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2020–2045 RTP/SCS, also known as Connect SoCal, was adopted on September 3, 2020. The 2020–2045 RTP/SCS presents a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The core vision of the 2020–2045 RTP/SCS is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The 2020–2045 RTP/SCS builds upon this core vision with new initiatives at the intersection of land use, transportation, and technology to reach the region's GHG reduction goals. These initiatives include policies, projects, and programs that strengthen and enhance each other beyond what each would accomplish in isolation. Strategies to advance the core vision address sustainable development, system preservation and resilience, demand and system management, transit backbone, complete streets, and goods movement. For each of these strategies, SoCal Connect provides information on progress made since the prior (2016–2040) RTP/SCS.

The Project's consistency with the applicable goals and strategies of the 2020–2045 RTP/SCS, which largely reflect the goals that were established in the 2016–2040 RTP/SCS, is outlined in Table 12 on page 199. As discussed therein, as an infill development located within an HQTA and NMA and along a Livable Corridor, the Project would be consistent with the applicable 2020–2045 RTP/SCS goals and strategies.

City of Los Angeles General Plan

Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the community plans and most of the City's General Plan Elements. Specifically, the Framework Element defines citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth in appropriate locations. The Land Use Chapter establishes these land use categories, which are described by ranges of intensity/density, heights, and lists of typical uses: Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. These land use categories are intended to serve as a guideline for the community plans and do not convey land

Table 12
Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS

Goal/Strategy	Analysis of Project Consistency
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods. **Goal 3:** Enhance the preservation, security, and resilience of the regional transportation system. **Goal 4:** Increase person and goods movement and travel choices within the transportation system.	**No Conflict.** The Project Site is located in an urbanized area within the City of Los Angeles that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is located within an HQTA as defined by SCAG. Specifically, the Project Site is located less than 0.25 mile (approximately 250 feet) from the intersection of Ventura Boulevard and Goodland Avenue, which is currently served by the Metro Bus Line 240 with frequency of service intervals of approximately 12 minutes during the morning and afternoon peak commute periods. As part of Metro's NextGen Bus Plan, Metro Bus Line 750 and a segment of Bus Line 150 were consolidated with Metro Bus Line 240 to operate more frequent service along Ventura Boulevard, which services the Project Site. As a result, when fully implemented, Metro's NextGen Bus Line 240 is expected to provide headways of 10 minutes during the weekday morning and afternoon peak periods, as well as during the midday hours, in both directions. The Project is also located within an NMA and along a Livable Corridor. In addition, the Project would include a pedestrian-friendly design that would incorporate landscaped pedestrian pathways and courtyards, ground floor uses, and streetscape improvements that would enhance the pedestrian experience and promote walkability on the Project Site and in the area. The Project would also provide long-term and short-term bicycle parking spaces in accordance with LAMC requirements. Additionally, the Project does not include any design features that could pose safety issues to travelers. Thus, the Project would maximize mobility and accessibility by providing opportunities for walking and biking and opportunities for the use of other alternative modes of travel, including convenient access to public transit.
Goal 5: Reduce greenhouse gas emissions and improve air quality. **Goal 6:** Support healthy and equitable communities. **Goal 7:** Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**No Conflict**. As discussed under Item XVII, Transportation, the Project would implement TDM strategies to reduce the number of single-occupancy vehicle trips to the Project Site, thereby facilitating a reduction in VMT and improved air quality to contribute to the protection of the environment and the health of the community's residents. As evaluated under Item III, Air Quality, operation of the Project would result in less than significant impacts related to air quality, and short-term construction impacts related to regional construction emissions would be reduced to less than significant levels. As identified in Part 3, Project Description, and Item VIII, Greenhouse Gas Emissions, the Project would include specific project elements that would further support and promote environmental sustainability. These features would consist of compliance with regulatory requirements, including the provisions set forth in the CALGreen Code that have been incorporated into the City of Los Angeles Green Building Code. These features also include energy conservation, water conservation, and waste reduction features. With implementation of regulatory requirements, project design features, and construction mitigation, impacts related to air emissions, which directly relate to the environment and the health of the City's residents, would be less than significant. In addition,

Table 12 (Continued)
Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS

Goal/Strategy	Analysis of Project Consistency
	the Project Site's location within an HQTA, and thus, within close proximity to a variety of public transit options, would further support healthy and equitable communities. The Project's mix of uses, pedestrian-friendly design, and provision of bicycle parking spaces would also promote a healthy community.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**No Conflict**. The Project would construct 520 residential units of various sizes and would also set aside 78 units for Very Low-Income households(i.e., 15 percent of the total project units) . These units would consist of a mix of 171 studios, 140 one-bedroom units, and 209 two-bedroom units in varying sizes and configurations, thereby providing a range of housing opportunities. Furthermore, the Project is within an HQTA and is supported by multiple transportation options, as discussed above.
Strategy: Focus Growth Near Destinations and Mobility Options.	**No Conflict**. The Project would construct 520 residential units (78 of which would be reserved for Very Low-Income Households), 18,019 square feet of restaurant uses, and 27,926 square feet of retail uses. The proposed development would locate a mix of uses that, along with other development in the area, would serve as a shopping, dining, and gathering destination. Furthermore, the Project would provide housing and jobs near transit. The Project has convenient access to a variety of public transportation options, including Metro's NextGen Bus Line 240, which includes a consolidation of Bus Lines 240, 750, and a segment of 150; Metro Bus Line 167; and DASH Van Nuys/Studio City Line. In addition, the Universal City/Studio City station of the Metro B Line is located approximately 2.86 miles southeast of the Project Site.
Strategy: Promote Diverse Housing Choices.	**No Conflict**. The Project would construct 520 residential units, including 78 units set aside for Very Low-Income Households. These units would be available in various sizes, including 171 studio units, 140 one-bedroom units, and 209 two-bedroom units.
Strategy: Support Implementation of Sustainability Policies.	**No Conflict**. While this is a citywide strategy, the Project would support it. The Project's design is based on smart growth principles and environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit. Additionally, the Project would incorporate environmentally sustainable design features required by the Los Angeles Green Building Code. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials wherever applicable. Furthermore, the Project would incorporate additional sustainable features including highly efficient HVAC systems, energy efficient wall insulation and glazing units, WaterSense-labeled plumbing fixtures, weather-based controller and drip irrigation systems, Energy Star-labeled appliances, and water-efficient landscape design. The Project would also comply with the City's EV charging requirements. In addition, the new residential units would be equipped with among high efficiency toilets and low-flow showerheads.

Table 12 (Continued)
Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS

Goal/Strategy	Analysis of Project Consistency

Source: Eyestone Environmental, 2021.

use entitlements or affect existing zoning for properties in the City.[117] The Project is not directly located within one of these districts, as identified in the Framework Element's Long Range Land Use Diagram for the San Fernando Valley, but it is located near a designated Community Center, encompassing the area at the intersection of Ventura Boulevard and Laurel Canyon Boulevard. A Community Center is defined as a focal point for surrounding residential neighborhoods and containing a diversity of uses such as small offices and overnight accommodations, cultural and entertainment facilities, schools and libraries, in addition to neighborhood-oriented services. Community Centers are served by small shuttles, local buses in addition to automobiles and/or may be located along rail transit stops.

As described below, the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan designates the northern portion of the Project Site for Other Public Open Spaces and Open Space land uses, while the southern portion of the Project Site is designated for Neighborhood Office Commercial uses. The Land Use Chapter identifies Open Space land use in accordance with LAMC. The Land Use Chapter further identifies Neighborhood District land use designation as retail commercial, small professional offices, personal services, food stores and similar uses. Additionally, mixed-use structures integrating housing with commercial uses (includes density and other incentives) are featured in Neighborhood Districts.

The Project's location along Ventura Boulevard and within the Specific Plan is consistent with the Land Use Chapter's description of Neighborhood District land uses. Furthermore, the Project will comply with numerous relevant goals, objectives, and policies set forth in the Land Use Chapter, as identified in Table 13 on page 202.

Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes a goal of creating a livable City for existing and future residents. This chapter defines "urban form" as the City's general pattern of building height, development intensity, activity centers, focal elements, and structural elements, such as natural features, transportation corridors, open space, and public facilities. "Neighborhood design" is defined as the physical character of neighborhoods and communities. The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts

[117] As indicated in Chapter 1 of the Framework Element, it neither overrides nor supersedes the community plans. It guides the City's long-range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and the City's community plans. The Framework Element expressly states that it "is not sufficiently detailed to impact requests for entitlements on individual parcels. Community plans will be more specific and will be the major documents to be looked to for consistency with the General Plan for land use entitlements." The Executive Summary of the Framework Element similarly states that it "does not convey or affect entitlements for any property." Precise determinations are made in the community plans.

Table 13
Consistency with Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
General Plan Framework Element	
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.	**No Conflict**. The Project includes a mix of uses, consisting of residential, retail, and restaurants, which would inherently result in a balanced distribution of land uses. The Project would be consistent with surrounding uses and would be designed to complement existing residential neighborhoods. The Project Site is located along the Ventura Boulevard corridor in close proximity to multiple public transit options, which would help reduce traffic congestion and improve air quality through a reduction in vehicles traveling to the Project Site. Furthermore, as detailed under Item XV, Public Services, under Item XIX, Utilities and Service Systems, the agencies that provide public infrastructure and services to the Project Site would have adequate infrastructure and capacity to serve the Project. In addition, the Project would include extensive open space and landscaping, including enhancements around the Los Angeles River that would increase public access to this resource. Thus, the Project would contribute to the achievement of a more livable City.
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**No Conflict**. The Project would provide a mix of uses, including 520 residential units (including 78 Very Low-Income affordable units, which is 15 percent of the total Project units), 18,019 square feet of restaurant uses, 27,920 square feet of retail uses, and 64,151 square feet of residential amenity and accessory space. In addition, 66,816 square feet of open space would be provided to support the needs of Project residents and visitors and to provide new open space opportunities to the public.
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	**No Conflict**. While this policy refers to the citywide provision of public infrastructure, as discussed under Item XV, Public Services, and Item XIX, Utilities and Service Systems, the Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, utilities to the Project Site would have capacity to serve the Project. Therefore, the Project would not conflict with this policy.
Policy 3.1.3: Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parklands and trails, neighborhood parks, and urban open spaces.	**No Conflict**. While this policy relates to citywide provision of open space, the Project would incorporate a variety of open space and amenities throughout the Project Site for residents and guests, totaling approximately 79,366 square feet. Open space areas would include approximately 66,816 square feet of common open space (52,520 square feet of exterior common open space and 14,296 square feet of interior common open space), which would exceed the requirements of the LAMC. Approximately 21,039 square feet of this common open space would be accessible to the public. The Project would also include approximately 12,500 square feet of private open space. Common open space areas would include a series of landscaped pedestrian pathways and courtyards that would connect the areas within the Project Site

Table 13 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
	and provide pedestrian access to the Los Angeles River Path. A large residential courtyard would be located toward the interior of the Project Site that would feature seating areas and landscaping. In addition, a landscaped pedestrian entry plaza would be located along Ventura Boulevard that would provide access to an open-air retail plaza. A publicly accessible outdoor plaza would be located between Building 2 and Building 3, which would connect to a landscaped and terraced open space area directly connecting to the Los Angeles River. Additional open space and landscaping would be provided on the roof (Level 7) of Building 1 and on the roof (Level 3) of Building 2. Therefore, the Project would not conflict with this policy.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution. **Policy 3.2.3**: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No Conflict**. While this is a citywide objective, the Project supports this vision of development. The Project is located in a designated HQTA and NMA and along a Livable Corridor, thereby promoting sustainability and reducing automobile dependency and VMT, with associated reductions in air quality and GHG emissions. The Project Site is located within close proximity to a variety of public transit options provided Metro and LADOT, including Metro's NextGen Bus Line 240, which includes a consolidation of Bus Lines 240, 750, and a segment of 150, located along Ventura Boulevard; Metro Bus Line 167, located along Coldwater Canyon Avenue; and DASH Van Nuys/Studio City Line, located approximately 0.4 mile north of the Project Site. In addition, the Universal City/Studio City station of the Metro B Line is located approximately 2.86 miles southeast of the Project Site. Furthermore, the Project would provide a total of 313 bicycle parking spaces, including 49 relocated spaces, for residents and visitors. In addition, the ground floor retail and restaurant uses and pedestrian-scaled improvements proposed by the Project would promote walkability in the vicinity of the Project Site. The Project would also include Transportation Demand Management (TDM) strategies to reduce vehicle trips to and from the Project Site. Therefore, the Project would provide the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, VMT, and air pollution.
Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.	**No Conflict**. As discussed under Item XIV, Population and Housing, population and employment growth associated within the Project would be well within SCAG's projections for the Los Angeles Subregion, which serve as the basis for the General Plan Framework's demographics projections and planned provisions of transportation and utility infrastructure and public services. Moreover, as discussed under Item XV, Public Services, and Item XIX, Utilities and Service Systems, the Project would incrementally increase water demand, wastewater generation, solid waste generation, and demand for public services, but would have a less than significant impact on these services and utilities. Therefore, the Project

Table 13 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
	would be consistent with this objective.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**No Conflict.** The Project would support this objective as the Project would include the development of 520 multi-family residential units, 18,019 square feet of restaurant uses; 27,926 square feet of retail uses; and 64,151 square feet of residential amenity and accessory space within a site designated as Neighborhood Office Commercial. The Project would be compatible with the existing neighborhood context and would further support this objective as it is located in an area that is well-served by several transit lines as well as numerous employment and entertainment options
Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents quality of life can be maintained or improved.	**No Conflict.** The Project would provide for the stability and enhancement of the neighborhood by providing 520 new multi-family units (with 15 percent of the total residential units reserved for Very Low-Income households) and 37,043 square feet of restaurant and retail uses to serve Project residents and residents in the surrounding area. As discussed for Policy 3.1.2 and Objective 3.2 above, the Project is located within an area with sufficient public infrastructure and services and that is well-served by public transit.
Policy 3.8.4: Enhance pedestrian activity by the design and siting of structures in accordance Chapter 5 Urban Form and Neighborhood Design policies of this Element and Pedestrian-Oriented District Policies 3.16.1 through 3.16.3.	**No Conflict**. The Project would enhance pedestrian activity within the Project Site by incorporating a series of pedestrian pathways that would connect to courtyards and gathering areas. In addition, the open-air retail plaza would include ground-level retail and restaurant uses that would further encourage pedestrian activity. The Project would also include pedestrian improvements along all of the frontages. For example, the Project would include pedestrian enhancements that would provide increased access and passive recreational opportunities along the Los Angeles River Path. In addition, an entry plaza would be located along Ventura Boulevard that would encourage pedestrian activity. Furthermore, the buildings would be stepped back from Ventura Boulevard, Coldwater Canyon Avenue, and the Los Angeles River, with the tallest Project component located toward the center of the Project Site. This would reduce building massing and, thereby, contribute to the pedestrian scale.
Housing Chapter	
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**No Conflict.** While this is a citywide objective, the Project would support its implementation. Specifically, as discussed in Objective 3.2 and Policy 3.2.3 above, the Project Site is located in a designated HQTA and NMA and within a Livable Corridor, and is located within close proximity to a variety of public transit options provided Metro and LADOT. In addition, the Project would be designed to be compatible with the surrounding area, which includes higher activity commercial areas along Ventura Boulevard and lower-density residential neighborhoods north of the Los Angeles River and south of Ventura Boulevard. As previously described, the Project design would be stepped back from all public frontages with

Table 13 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
	the tallest component located toward the center of the Project Site. In addition, the Project would enhance the interface between the Project Site and the residential uses to the north by incorporated building articulation, landscaping, and open space areas connecting the Project Site to the River.
Open Space and Conservation Chapter	
Goal 6A: An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.	**No Conflict.** While this is a citywide/regional goal, the Project would contribute to the public and private open space system by including a series of landscaped pedestrian pathways and courtyards that would connect the Project Site and provide access to the Los Angeles River Path. Also, an outdoor public plaza would be located between Building 2 and Building 3. Additional open space would be provided on the roof (Level 7) of Building 1, which would include a pool and deck, and on the roof (Level 3) of Building 2, which would include an amenity deck overlooking the Los Angeles River. The Project would provide 66,816 square feet of open space, which exceeds the requirements of the LAMC. Thus, the Project would not conflict with this goal.
Policy 6.4.7: Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources.	**No Conflict.** While this is a citywide policy, the Project would support its implementation by providing approximately 66,816 square feet of open space. The Project would provide several open space areas that would be accessible to the public, including a series of landscaped pedestrian pathways and courtyards, including an entry plaza and an open-air retail plaza. In addition, the Project would include an outdoor public plaza located between Building 2 and Building 3 that would connect to a terraced open space area that would lead to the Los Angeles River Path. This on-site open space would serve to reduce the demand on parks and recreational facilities in the vicinity of the Project Site and would provide new recreational opportunities associated with the Los Angeles River Path. Thus, the Project would not conflict with this policy.
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods. b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.	**No Conflict.** Refer to Policy 6.4.7 above.

Table 13 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	**No Conflict**. The Project would support this objective by providing 18,019 square feet of restaurant uses and 27,926 square feet of retail uses to complement the employment base of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area, help meet needs of local residents, and foster continued economic investment. In addition, the Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality. Thus, the Project would not conflict with this objective.
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	**No Conflict**. The Project would develop 27,926 square feet of retail uses and 18,019 square feet restaurant uses in an area well served by public transit. Specifically, the Project Site is located less than 0.25 mile (approximately 250 feet) from the intersection of Ventura Boulevard and Goodland Avenue, which is currently served by the Metro's NextGen Bus Line 240 (which includes a consolidation of Bus Lines 240, 750, and a segment of 150), with current frequency of service intervals of 12 minutes during the morning and afternoon peak commute periods. In addition, the Project Site is located approximately 0.4 mile south of the DASH Van Nuys/Studio City station and approximately 2.86 miles northwest of the Universal City/Studio City station of the Metro B Line.
Policy 7.2.5: Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.	**No Conflict**. As discussed under Objective 7.2 and Policy 7.2.3 above, the Project would include approximately 27,926 square foot of retail uses that would serve employees, visitors, and the local neighborhood, which would reduce VMT. Thus, the Project would not conflict with this policy.
Infrastructure and Public Services Chapter	
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	**No Conflict**. As discussed under Item XV, Public Services, under Item X, Hydrology and Water Quality, in accordance with the requirements of the NPDES Construction General Permit, the Project would implement a SWPPP adhering to the California Stormwater Quality Association BMP Handbook. The Project would implement BMPs and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would include the installation of capture and use system BMPs to collect and store the first flush of stormwater runoff to satisfy LID Manual requirements, which would then be used for landscape irrigation. The Project does not include uses that handle or generate hazardous substances. The Project would also reduce the amount of flow entering the wastewater system through the incorporation of Project Design Feature WAT-PDF-1 included under Item XIX, Utilities and Service Systems, which would minimize water use and the corresponding wastewater generation. Thus, with the implementation of the BMPs, the Project would reduce the amount of hazardous substances and the total amount of flow

Table 13 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
	entering the wastewater system over existing conditions and the Project would not conflict with this policy.
Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations. **Objective 9.6:** Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	**No Conflict.** While this is a citywide goal, the Project would not interfere with its implementation as detailed in Policy 9.3.1 above. Thus, the Project would not conflict with this goal.
Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.	**No Conflict.** As evaluated under Item XIX, Utilities and Service Systems, based on the WSA prepared for the Project, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the Project would not conflict with this objective and no new water supply, storage, and delivery systems are required to support the development.
Housing Element	
Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.	**No Conflict**. The Project would construct 520 residential units of various sizes and would also set aside 78 units for Very Low-Income households. The residential units would consist of a mix of 171 studios, 140 one-bedroom units, and 209 two-bedroom units in varying sizes and configurations and at different price points, thereby providing a range of housing opportunities. Thus, the Project would not conflict with goal.
Policy 1.1.4: Plan for and provide sufficient services and amenities to support the existing and planned population.	**No Conflict.** While this is a citywide goal, with regard to utilities and service systems, as discussed under Item XIX, below, the existing infrastructure would have sufficient capacity to accommodate the Project. In addition, the Project would provide a variety of open space and recreational amenities to enhance the open space resources in the neighborhood, including improvements associated with the Los Angeles River that would increase accessibility and functionality.
Policy 1.2.1: Expand rental and for-sale housing for people of all income levels. Prioritize housing developments that result in a net gain of Affordable Housing and serve those with the greatest needs. **Policy 1.2.2:** Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households.	**No Conflict.** The Project would develop 520 multi-family residential units consisting of studio, one-, and two-bedroom rental units. The various residential units would be rented at different price points and would include 78 units reserved for Very Low-Income households, thereby providing options to meet the needs of people of all income levels and resulting in a net gain of Affordable Housing.
Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for household of all income levels.	**No Conflict**. Refer to the response for Goal 1, above.

Table 13 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
Goal 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.	**No Conflict.** The Project would provide 520 residential units of various sizes and prices, including 78 units for Very Low-Income households on a site that is well-served by public transit. The Project would include an array of amenities for the residents that would contribute to a healthy and livable community, including open space and enhanced access to the Los Angeles River, a pool and deck on the roof (Level 7) of Building 1, and an amenity deck overlooking the Los Angeles River on the roof (Level 3) of Building 2. In addition, the design of the Project is based on principles of environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit. In addition, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen). These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. Thus, consistent with this goal, the Project would create a healthy, livable, sustainable, and resilient community.
Policy 3.1.5: Develop and implement environmentally sustainable urban design standards and pedestrian-centered improvements in development of a project and within the public and private realm such as shade trees, parkways, and comfortable sidewalks. **Policy 3.1.7:** Promote complete neighborhoods by planning for housing that includes open space, and other amenities.	**No Conflict.** The Project would support this policy by implementing sustainability measures consistent with the Los Angeles Green Building Code and CALGreen that would reduce energy and water usage and waste, thereby reducing associated GHG emissions and minimizing the Project's impact on natural resources and infrastructure. These measures would include, but not be limited to, photovoltaic (solar) cell-ready; electric vehicle charging stations; material recycling stations; highly efficient HVAC systems; energy-efficient wall insulation and glazing units; WaterSense-labeled, or functionally equivalent, plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and water-efficient landscape design (i.e., grouping plants according to their water needs, and the use of native and low-water plants). In addition, in accordance with the City's LID ordinance requirements, the Project would use captured stormwater runoff for irrigation of the new landscaping around the Project Site. Provisions for harvesting and filtering greywater for landscape irrigation would also be provided, as allowed by the City. Additionally, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials where applicable. The Project would also provide a variety of amenities to serve the residences and visitors to the Project Site. The Project would a total of approximately 79,366 square feet, including approximately 52,520 square feet of exterior common open space, approximately 14,296 square feet of interior common space, and approximately 12,550 square feet of private open space. Approximately 21.039 square feet of the Project's

Table 13 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
	open space areas would be accessible to the public. The Project Site would include a series of landscaped pedestrian pathways and courtyards that would connect the Project Site and provide pedestrian access to the Los Angeles River Path. Additional open space would be provided on the roof of Building A, which would include a pool and deck, and on the roof of Building B, which would include an amenity deck overlooking the Los Angeles River.
Objective 3.2: Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options. **Policy 3.2.1:** Promote the integration of housing with other compatible land uses at both the building and neighborhood level. **Policy 3.2.5:** Promote and facilitate the reduction of water, energy, carbon and waste consumption in new and existing housing.	**No Conflict.** The Project would incorporate environmentally sustainable design features and open space areas and amenities as described in response to Policy 3.1.5 and Policy 3.1.7, above. The Project would create a mixed-use development consisting of multi-family residential and retail/restaurant uses. The Project would be located in an area well-served by public transit. In addition, the Project would provide bicycle parking and amenities throughout the Project Site to encourage alternative modes of transportation. The Project's residential development would include 520 multi-family residential units consisting of studio, one-, and two-bedroom units. The proposed residential and commercial uses would be integrated with a variety of open space and landscaping opportunities, including the Los Angeles River, creating an attractive mixed-use development.
Mobility Plan 2035	
Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.	**No Conflict**. During construction of the Project, the majority of construction activities would be anticipated to be confined on-site. However, limited construction activities may be needed on adjacent rights-of-way. Pursuant to Project Design Feature TR-PDF-2, the Project would prepare and implement a Construction Traffic Management Plan to minimize potential construction impacts to the surrounding area related to construction trucks, worker trips, and any possible sidewalk and lane closures and ensure safe passage for all modes of travel during Project construction. As part of the Construction Traffic Management Plan, a Worksite Traffic Control Plan will be developed to identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. The Worksite Traffic Control Plan will ensure that the potential conflicts between construction activities, street traffic, bicyclists and pedestrians are minimized and that safe passage of all modes of travel will remain during times of Project construction. Thus, the Project would not conflict with this policy.
Policy 2.3: Recognize walking as a component of every trip and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**No Conflict**. The Project would improve pedestrian accessibility within and around the Project Site by providing new landscaping, walkways, crosswalks, and sidewalks that meet their designated width. No additional curb cuts are proposed, and one existing driveway would be removed, thereby reducing the total vehicle conflict points with pedestrians. Each driveway would all be designed to provide safe access for pedestrians. The sidewalks that serve as

Table 13 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
	routes to the Project Site would continue to provide proper connectivity and adequate widths for a comfortable and safe pedestrian environment. The Project's pedestrian entrances along Ventura Boulevard and Coldwater Canyon Avenue would provide a comfortable and welcoming atmosphere, and would provide pedestrian access to the open-air retail plaza (off Ventura Boulevard) and the Los Angeles River Plan (off Coldwater Canyon Avenue). Public access to the River Path would be enhanced through the addition of a terraced and landscaped open space area. Additionally, new street trees would be provided, and landscaping would be incorporated along the Project's street frontages on Ventura Boulevard and Coldwater Canyon Avenue.
Policy 2.10: Facilitate the provision of adequate on and off-street loading areas.	**No Conflict.** The Project would provide a pick-up/drop-off zone on Ventura Boulevard that would be designed to meet the Project Site's loading needs without disrupting traffic within the public right-of-way. All other loading and service areas would also be located in the subterranean parking levels.
Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.	**No Conflict**. While this is a citywide policy, the Project would promote this policy by providing adequate vehicular and pedestrian access and providing bicycle facilities, as previously discussed. In addition, the Project would be located in an area well served by public transit. Thus, the Project would not conflict with this policy.
Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	**No Conflict**. The Project would support this policy by new development consisting of residential and commercial uses located in proximity to employment, destinations, and other neighborhood services in a transit-rich area, and in a designated HQTA, NMA, and Livable Corridor.
Policy 3.4: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	**No Conflict**. The Project would support the implementation of this citywide policy by locating a new mixed-use development in an area well served by public transit. Residents, employees, and visitors to the Project Site would be well-served by local and regional transit options, which would reduce the number of vehicle miles traveled. Thus, the Project would not conflict with this policy.
Policy 3.8: Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.	**No Conflict**. The Project would provide a total of 313 bicycle parking spaces consisting of 273 long-term spaces (which includes 49 spaces that are proposed to be relocated from The adjacent Shops Development) and 40 short-term spaces. The Project would also provide a closed-circuit security camera system to ensure that the bicycle parking and storage areas are secured and well-maintained. Thus, the Project would not conflict with this policy.
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	**No Conflict**. The Project supports implementation of this policy by locating a mix of residential, retail, and restaurant uses in an area well served by public transit. The Project would also promote pedestrian activity through building design and streetscape amenities and bicycling opportunities. In

Table 13 (Continued)
Consistency with Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Analysis of Project Consistency
	addition, as outlined under Item XVII, Transportation, the Project would incorporate several TDM measures to reduce the number of single occupancy vehicle trips to the Project Site. Therefore, the Project would support ways to reduce VMT and would not conflict with this policy.
Source: Eyestone Environmental, 2021	

and lay a foundation for updating the community plans. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The Project's consistency with the relevant objectives and policies that support the goals of the Urban Form and Neighborhood Design Chapter of the Framework Element is discussed under Item I, Aesthetics. As concluded therein, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

Open Space and Conservation Chapter

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources, address the outdoor recreational needs of the City's residents, and guide amendments to the General Plan Open Space Element and Conservation Element. This chapter also includes policies to resolve the City's open space issues. Specifically, this chapter contains open spaces goals, objectives, and policies regarding resource conservation and management, outdoor recreation, public safety, community stability, and resources development.

The Project's consistency with this Framework Element chapter is provided in Table 13 on page 202. As described therein, the Project would be consistent with the relevant objectives and policies that support the goals of the Open Space and Conservation Chapter of the Framework Element. The Project is located along Ventura Boulevard, a densely developed mixed-use corridor, and does not encroach on the City's natural resources. The Project would include new landscaped areas and new street trees, as well as 79,366 square feet of exterior and interior common open space and private open space for its residents, as well as approximately 21,039 square feet of open space that would be accessible to the public. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Open Space and Conservation Chapter that seek to avoid or mitigate an environmental effect.

Infrastructure and Public Service Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest and two traffic signals at the project driveways. For each of the public services and infrastructure systems, basic policies call for

monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project's consistency with the Framework Element's Infrastructure and Public Services Chapter is shown in Table 13 on page 202. As described therein, the Project would comply with the City's grading permit regulations, which require the preparation of an erosion control plan. The Project would also be required to comply with the City's LID Ordinance, which would require the implementation of BMPs to collect, detain, and treat runoff on-site. As discussed under Item XIX, Utilities and Service Systems, LADWP would be able to meet the water demand for the Project as well as existing and planned water demands of its future service area. Furthermore, the Project would not exceed the available capacity within the water distribution infrastructure that would serve the Project Site and no system upgrades would be required as a result of the Project. Thus, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Infrastructure and Public Services Chapter that seek to avoid or mitigate an environmental effect.

Conservation Element

The Conservation Element primarily addresses the preservation, conservation, protection, and enhancement of the City's natural resources, including agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resources. The Conservation Element also recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Project Site is currently developed with a five-story hotel and associated uses and surface parking areas and does not contain any natural resources. As discussed throughout this SCEA, the Project would have no significant impact on agricultural lands, endangered species, habitat areas, or mineral resource areas. In addition, as discussed under Item IV, Biological Resources, above, the trees and landscaping within the Project Site are not subject to the City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873), and mitigation measures would ensure that impacts to a protected oak tree located adjacent to the Project Site would be less than significant. With respect to historic resources, as discussed under Item V, Cultural Resources, of this SCEA, the existing on-site building is not considered to be a historic resources as defined by CEQA. Furthermore, none of the potential historical resources in the Project vicinity would be directly or indirectly affected by the Project, as they are physically separate from the Project and the primary public views and general character of these resources would remain unchanged by the Project. The Project would also implement the City's standard conditions to ensure that potential impacts to archaeological and paleontological resources would remain less than significant, and potential impacts to tribal cultural resources would be less than significant with incorporation of the City's standard mitigation, as outlined in Mitigation Measures TCR-MM-1 through TCR-MM-3. Furthermore, as analyzed in under Item I, Aesthetics, of this SCEA, the Project would not obstruct or remove access to natural and scenic vistas, but instead, would enhance and improve access to the Los Angeles River. Thus, the Project would not conflict with Section 15 of the Conservation Element, which encourages protection of scenic vistas and the preservation of public views of visual resources. Overall, as outlined above, the Project would not conflict with the Conservation Element.

Housing Element

The 2021-2029 Housing Element (Housing Element), which was adopted on November 24, 2021, identifies City's housing conditions and needs; establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy; and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City.[118] The Housing Element was adopted on November 24, 2021. The goals of the Housing Element are as follows:

- Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs;
- Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households at all income levels;
- Goal 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos;
- Goal 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present; and
- Goal 5: A City that is committed to preventing and ending homelessness.

The Project's consistency with the applicable goals, policies, and objectives set forth in the Housing Element is analyzed in Table 13 on page 202. As described therein, the Project would provide 520 new dwelling units including 78 Very Low-Income affordable units (15 percent of the total units), and thereby directly providing a diverse range of new housing opportunities for the City's residents. The Project would provide these new housing opportunities for residents in direct proximity to Ventura Boulevard's diverse residential and commercial environment, while also enabling residents to utilize existing transit infrastructure provided by Metro's Rapid and local bus lines in the vicinity of the Project Site. Additionally, the Project will further contribute to an active pedestrian environment through its landscaping and other streetscape improvements. Also, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy, water usage, and waste generation, thereby reducing associated GHG emissions and minimizing the impact on natural resources and infrastructure. Therefore, as detailed in Table 13, the Project would be consistent with the applicable objectives and policies set forth in the Housing Element.

Transportation Element/Mobility Plan 2035

The Mobility Plan, adopted on January 20, 2016 and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan.

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[118] While the 2021-2029 Housing Element was adopted by the Los Angeles City Council, the California Department of Housing and Community Development has determined that it is out of compliance with State Housing Element Law. Thus, the City is required to revise and re-adopt the Housing Element in order to meet the statutory requirement of the State Housing Element Law.

The overarching goal of the Mobility Plan is to achieve a transportation system that balances the needs of all road users. The Mobility Plan incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, The Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:[119]

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals. The Project would be consistent with the relevant objectives and policies that support the goals of the Mobility Plan, as detailed in Table 13 on page 202. Specifically, the Project would support the Mobility Plan policy to provide for safe passage of all modes of travel during construction by implementing a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-2, which would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets. The Project would be consistent with the Mobility Element street standards with the exception of a Waiver of Dedication and Improvement request to allow for a reduced sidewalk along a portion of the Ventura Boulevard frontage to allow for a dedicated rideshare pick-up and drop-off area. The Project also recognizes all modes of travel by providing adequate vehicular access, improving pedestrian access, and providing bicycle facilities. Also, the Project's proximity to a variety of public transit options would provide all residents, workers, and visitors convenient access to transit services. Therefore, the Project would be generally consistent with the applicable policies that support the goals and objectives set forth in the Mobility Plan.

Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan (Community Plan) is one of 35 community plans established for different areas of the City to implement the policies of the General Plan Framework Element. Last updated in 1998 and currently in the process of an update, the specific purpose of the Community Plan is "promoting a vision of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass area as a community that looks with pride and approaches its future with eagerness, while maintaining its individual identity by:

[119] Los Angeles Department of City Planning, Mobility Plan 2035, September 2016, https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf, accessed April 15, 2022.

- Preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of compatible new housing opportunities.

- Improving the function, design and economic vitality of the commercial corridors.

- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.

- Maximizing the development opportunities of the future rail transit system while minimizing any adverse impacts.

- Planning the remaining commercial and industrial development opportunity sites for needed job producing uses that improves the economic and physical condition of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area."

The Project would preserve and enhance the positive characteristics of existing residential neighborhoods while providing a variety of compatible new housing opportunities and improve the function, design and economic vitality of the commercial corridors. The Project will also advance a number of other objectives, goals and policies of the Community Plan, as evidenced by the consistency analysis in Table 14 on page 216. As set forth therein, the Project would be consistent with the applicable objectives and policies set forth in the Community Plan.

Ventura–Cahuenga Boulevard Corridor Specific Plan

Pursuant to Government Code Section 65450 et seq., a specific plan is a land use mechanism for systematically implementing the general plan for a prescribed geographic area. The Ventura–Cahuenga Boulevard Corridor Specific Plan was first adopted by the City in 1991, and last updated in 2001. The Specific Plan is in the process of being updated with the intent of modernizing regulations, streamlining processes, and translating land use regulations into the City's comprehensive update to the Zoning Code.

The Specific Plan does not outline goals, objectives, or policies, although it does identify purposes that relate to the regulations outlined in the plan. These regulations are outlined in Section 6 of the Specific Plan, which includes building limitations, and Section 7, which outlines land use regulations for all land uses in the Specific Plan area. Whenever the Specific Plan contains provisions which require different setbacks, restricted yards, lower densities, lower heights, restricted uses, greater parking requirements or other greater restrictions or limitations on development than would be allowed in the LAMC, the Specific Plan shall supersede the applicable provisions of the LAMC. Notwithstanding, the Specific Plan represents the direct implementation of the City's General Plan for the Project Site and other properties within the Ventura–Cahuenga Corridor area and has been found by the City to be in conformance with the General Plan. The Project's consistency with the applicable standards included in the Specific Plan is outline in Table 15 on page 220. As noted therein, the Project relies on height and square footage increases in excess of Specific Plan standards and side and rear yard reductions permitted by the State Density Bonus Law as a result of the provision of 78 Very Low-Income units (i.e., 15 percent of the total number of units). A Letter of Clarification has been issued by the Department of City Planning that clarifies certain conditions to the existing Shops Development pursuant to the approval of the proposed Project and the requested Lot Line Adjustment. The Letter of Clarification includes the following clarifications, none of which render the Shops Development out of compliance with applicable Ventura–Cahuenga Boulevard Corridor Specific Plan standards:

Table 14
Consistency with Goals, Objectives, and Policies of the Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
Land Use Policies and Programs—Residential	
Goal 1: A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community.	**No Conflict**. The Project's 520 dwelling units, including 78 Very Low-Income affordable units (i.e., 15 percent of the total units), would provide new housing opportunities to people in need of housing, help to meet the diverse housing needs within the Community Plan area, and make new housing opportunities available to the Community Plan's population. Furthermore, the development of the commercial uses on the Project Site, combined with the residential uses, would constitute an appropriate location of new housing as well as community-serving uses in close proximity to Ventura Boulevard, existing transit infrastructure, and existing nearby low- to mid-rise commercial developments, while protecting nearby single-family residential neighborhoods. The Project is therefore consistent with Goal 1 of the Community Plan.
Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.	**No Conflict**. No housing units would be removed as part of the Project. The Project would result in the removal of the Sportsmen's Lodge Hotel and would provide 520 new dwelling units, including 78 Very Low-Income affordable units (i.e., 15 percent of the total dwelling units) to accommodate the need for housing units within the Community Plan area and across the City.
Objective 1-2: To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.	**No Conflict.** The Project would provide 520 residential dwelling units, including 78 Very Low-Income affordable units (i.e., 15 percent of the total units). The Project will provide new housing in direct proximity to Ventura Boulevard's diverse commercial environment, while also enabling residents to utilize existing transit infrastructure provided by Metro's Rapid and local bus lines in the vicinity of the Project Site, which would reduce the number of vehicle miles traveled. Additionally, the Project will further contribute to an active pedestrian environment through its landscaping, street tree planting, and other streetscape improvements, which will make the Project accessible to residents.
Policy 1-2.1: Locate higher residential densities near commercial centers, rail transit stations and major bus routes where public service facilities, utilities and topography will accommodate this development.	**No Conflict**. The Project is located along the Ventura Boulevard corridor in close proximity to multiple public transit options. Specifically, the Project Site is located less than 0.25 mile (approximately 250 feet) from the intersection of Ventura Boulevard and Goodland Avenue, which is served by the Metro's NextGen Bus Line 240 (which includes consolidated Bus Lines 750 and 150) with frequency of service intervals of 10 minutes during the morning and afternoon peak commute periods. In addition, the Project Site is located approximately 0.4 mile south of the DASH Van Nuys/Studio City Line and approximately 2.86 northwest of the Universal City/Studio City station of the Metro B Line. As a result, the Project would provide residents and visitors with convenient access to public transit. Also, the Project would provide approximately 39,467 square feet of community-serving retail and restaurant uses to complement the employment base of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area, which

Table 14 (Continued)
Consistency with Goals, Objectives, and Policies of the Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
	will help meet needs of local residents, and foster continued economic investment. The Project's surrounding area adheres to an irregular network of streets and blocks that responds to the local topography and the weaving course of the channelized Los Angeles River.
Objective 1-4: To promote and insure the provision of adequate housing for all persons regardless of income, age or ethnic background.	**No Conflict**. The Project would develop new affordable housing units in order to directly meet the high demand for additional housing in the City and Community Plan area. Specifically, the Project would provide 78 Very Low-Income affordable units, which represents 15 percent of the total new units.
Policy 1-4.2: Promote housing in mixed use projects in pedestrian oriented areas and transit oriented districts.	**No Conflict**. The Project places housing as well as neighborhood-serving commercial uses near transit and providing bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. Additionally, due to its proximity to numerous existing transit lines, the Project also encourages increased transit use, thereby contributing to increased ridership.
Land Use Policies and Programs—Commercial	
Policy 2-1.1: New commercial uses shall be located in existing established commercial areas or existing shopping areas.	**No Conflict**. The Project would provide approximately 37,043 square feet of community-serving retail and restaurant uses. The Project Site is located in an urbanized area developed with a mix of low- to mid-rise commercial uses adjacent to the east, south, and west along a heavily trafficked vehicular corridor (Ventura Boulevard).
Policy 2-3.7: Promote mixed use projects in proximity to transit stations, along transit corridors, and in appropriate commercial areas.	**No Conflict.** The Project is located along the Ventura Boulevard corridor in close proximity to multiple public transit options. Specifically, the Project Site is located less than 0.25 mile (approximately 250 feet) from the intersection of Ventura Boulevard and Goodland Avenue, which is served by the Metro's NextGen Bus Line 240, which includes a consolidation of Bus Lines 240, 750, and 150 to provide increased frequency and service operation), with current frequency of service intervals of 12 minutes during the morning and afternoon peak commute periods, as well as throughout the midday hours, in both direction. Furthermore, the Project Site is located with a designated HQTA and NMA and within a Livable Corridor. Therefore,, the Project would provide residents and visitors with convenient access to public transit.
Policy 2-4.1: Require that any proposed development be designed to enhance and be compatible with adjacent development.	**No Conflict.** The Project is a new mixed-use residential development with commercial components that would serve the existing and future residents of the surrounding community. The proposed low-to mid-rise residential and commercial uses would be consistent and compatible with the existing adjacent low- and mid-rise uses surrounding the Project Site. Furthermore, the Project will create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of commercial uses on the ground level. The Project would also provide new street trees which would

Table 14 (Continued)
Consistency with Goals, Objectives, and Policies of the Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
	improve the pedestrian realm and experience.
Policy 2-5.1: Require that future development of properties located along the Los Angeles River be designed with river access features.	**No Conflict.** The Project Site is bounded by the Los Angeles River to the north. Therefore, the Project would contribute to the public and private open space system by including a series of landscaped pedestrian pathways and courtyards that would connect the Project Site and provide access to the Los Angeles River Path.
Land Use Policies and Programs—Open Space	
Goal 5: A community with sufficient open space in balance with development to serve the recreational, environmental and health needs of the community and to protect environmental and aesthetic resources.	**No Conflict.** The Project would provide approximately 79,366 square feet of open space, including 66,816 square feet of common open space (52,520 square feet of exterior common open space and 14,296 square feet of interior common open space) and 12,550 square feet of private open space, with approximately 21,039 square feet of open space accessible to the public. The Project would contribute to the public and private open space system by including a series of landscaped pedestrian pathways and courtyards that would connect the Project Site and provide access to the Los Angeles River Path. Also, the Project would include an outdoor public plaza located between Building 2 and Building 3. Additional open space would be provided on the roof (Level 7) of Building 1, which would include a pool and deck, and on the roof (Level 3) of Building 2, which would include an amenity deck overlooking the Los Angeles River. Additional common open space would be provided on the first floor of the building and would include walkways, outdoor dining seating, new trees, and raised planters.
Police Protection	
GOAL 8: A community with adequate police facilities and service to protect the community's residents from criminal activity, reduce the incidence of crime and provide other necessary law enforcement services. **Objective 8-1:** To provide adequate police facilities and personnel to correspond with population and service demands. **Policy 8-1.1:** Coordinate with the Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	**No Conflict**. Consistent with Goal 8 and applicable objectives and policies. In order to ensure that the Project would provide adequate security, and would not impede police protective services, the Project would be reviewed by the City to ensure design guidelines relative to security, semi-public and private spaces, are implemented. Therefore, the Project would be consistent with applicable objectives and policies of Goal 8.
Fire Protection	
GOAL 9: Protect the community through a comprehensive fire and life safety program. **Objective 9-1:** Ensure that fire facilities and protective services are sufficient for the existing and future population and land use. **Policy 9-1.1:** Coordinate with the Fire	**No Conflict**. Consistent with Goal 9 and applicable objectives and policies, the Project would be located in proximity to an existing fire station (refer to Item XV, Public Services). Plans would be subject to the approval of the Los Angeles Fire Department (LAFD) for fire and life safety plan review. LAFD would review fire truck access, fire department connection location, and hydrant pressure requirements for the Project.

Table 14 (Continued)
Consistency with Goals, Objectives, and Policies of the Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	Therefore, the Project would be consistent with applicable objectives and policies of Goal 9.
Transportation	
Objective 13-1: To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multi-modal transportation and safety, comply with Citywide performance standards for acceptable levels of service (LOS) and insure that necessary road access and street improvements are provided to accommodate traffic generated by new development.	**No Conflict**. As concluded in the Transportation Assessment included in Appendix L of this SCEA, the Project would not result in any VMT impacts under the City's current criteria. Furthermore, the Project would promote multi-modal transportation through its location in a HQTA with access to several transit options. In addition, the Project would encourage biking and walking by providing a total of 313 bicycle parking spaces, implementing pedestrian network improvements, and incorporating voluntary travel behavior change, reduced parking, and unbundled parking. No street improvements would be required, but the Project proposed to include signals at the two vehicular access points, which would provide additional crossing opportunities and improve safety between vehicles and pedestrians/bicyclists. The Project would also include a passenger loading zone along Ventura Boulevard, which would reduce the potential for queuing issues on the main roadway. Therefore, the Project would be consistent this objective.
Historic and Cultural Resources	
GOAL 16: Preservation and restoration of cultural resources, neighborhoods and landmarks which have historical and/or cultural significance. **Objective 16-1**: To ensure that the community's historically significant resources are protected, preserved, and/or enhanced.	**No Conflict**. As discussed under Item V, Cultural Resources, the Project would not directly impact any historical or cultural resource as there are none on the Project Site. In addition, the potential historical resources in the Project vicinity would not be directly or indirectly impacted by the Project. Therefore, the Project would be consistent with this goal and objective.

Source: Eyestone Environmental, 2021

- **Condition A.6: Lot Coverage**—Currently the Shops Project Permit Compliance approval allows for a maximum lot coverage of 29 percent. A clarification was made to permit a maximum lot coverage up to 60 percent in compliance with the Specific Plan.

- **Condition A.7: Floor Area Ratio**—The Shops Project Permit Compliance maximum FAR was clarified so as to not exceed 0.88:1, below the 1:1 FAR permitted by the Specific Plan.

- **Condition A.8: River Frontage Landscape Buffer**—The Project Permit Compliance requires a landscape buffer along the River frontage. After the Lot Line Adjustment is recorded, the Shops Development will no longer have river frontage and therefore this condition would no longer be applicable.

Table 15
Consistency with Standards of the Ventura-Cahuenga Boulevard Corridor Specific Plan

Standard	Analysis of Project Consistency
Section 6.B.3. Floor Area Ratio Limitations. The following Floor Area Ratio shall apply to Projects within the Neighborhood and General Commercial Plan Designations: No Project may exceed a maximum Floor Area Ratio of 1.0:1.	**No Conflict.** The Project would result in 637,214 square feet of floor area, representing a maximum FAR of up to 2.84:1. As permitted by State Density Bonus Law and the City's implementing ordinance codified in LAMC 12.22.A.25, the Project requests approval of a Density Bonus incentive to permit a 2.73:1 FAR.
Section 7.A.3.b. Side Yards. A side yard of 10 feet may be permitted, except that an accessway, which may include a maximum 20 foot wide driveway, a maximum 4 foot wide walkway and landscape buffers of 18 inches to 5 feet on either side of the accessway, may be provided for vehicular access to parking and pedestrian access to the building, or as specified under Item F [Parking], or where the Project contains residential uses, in which case, LAMC Sections 12.07, 12.07.01, 12.07.1, 12.08, 12.08.1, 12.08.3, 12.08.5, 12.09, 12.09.1, 12.09.5, 12.10, 12.11, and 12.12 shall apply. For corner lots, the side of the lot facing the side street intersecting with Ventura or Cahuenga Boulevard shall require a minimum 18 inch and maximum 15 foot landscaped setback.	**No Conflict**. Building 2 (with the exception of a portion of the Parking P1 level) is setback 20 feet from the rear property line Ten foot side yards are also provided with the exception of the Parking P1 level. As permitted by State Density Bonus Law and the City's implementing ordinance codified in LAMC 12.22.A.25, the Project request approval of Density Bonus waiver of development standards for a 0-foot rear yard in lieu of 20 feet required at the Parking Level P1 only as well as 0-foot side yards in lieu of the required 10 feet at the Parking Level P1 only.
Section 7.B.2. Neighborhood and General Commercial Plan Designation Areas. Buildings and structures shall cover no more than 60 percent of the lot area.	**No Conflict**. The Project's proposed lot coverage is approximately 55.6 percent and will not exceed the 60 percent allowance for lot coverage.
Section 7.E.1.a. Height Limit. Studio City/Cahuenga Pass. Notwithstanding Subdivisions 2 and 3 of LAMC Section 12.21.1 B, no building or structure shall exceed the following heights: 4. From the intersection of Whitsett Avenue and Ventura Boulevard to the intersection of Fulton Avenue and Ventura Boulevard: On both sides of Ventura Boulevard—30 feet.	**No Conflict.** The Project includes the development of three low- to mid-rise buildings ranging in height from 37 feet to 94 feet. The Specific Plan permits 30 feet in height and up to 45 feet in height for buildings designed with setbacks. In addition, the Project is subject to the transitional height limits set forth in LAMC Section 12.21.1.A10 due to proximity to an Open Space zone (Los Angeles River). As permitted by State Density Bonus Law and the City's implementing ordinance codified in LAMC 12.22.A.25, the Project requests approval of a Density Bonus incentive to permit a maximum Project height of 94 feet and a waiver of development standard to waive the transitional height limits. Nevertheless, the project structures step down along the Ventura Boulevard and River frontage consistent with the spirit of the Specific Plan and LAMC stepback/transitional height requirements.
Section 7.F.1.a. Parking Requirements. For commercial uses, other than offices, at least one parking space for each 250 square feet of floor area.	**No Conflict.** The Project proposes the parking ratio of 1 parking space for each 250 square feet of floor area for the proposed retail uses.
Section 7.F.1.c. Parking Requirements. For restaurants, take-out food establishments, banquet rooms and related uses, at least one parking space for each 100 square feet of floor area.	**No Conflict.** The Project proposes the parking ratio of 1 parking space for each 100 square feet of floor area for the proposed restaurant uses.

- **Condition A.9.a:** The Project Permit Compliance prohibits parking for the Shops Development on the eastern most parcel (APN-028). This condition clarifies that 446 spaces are permitted within the Sportsmen's Lodge Mixed-Use Project's subterranean parking structure.

- **Condition A.9.h & j:** The Project Permit Compliance approval requires specific parking related signage on the landing and hotel sites which will be made obsolete by the Sportsmen's Lodge Mixed-Use Project.

- **Condition A.12**: The Project Permit Compliance approval conditions that require landscaping for surface parking will be removed as the Shops parking will be located below grade.

Los Angeles Zoning Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. The Zoning Code establishes objective zoning and development standards but was not adopted to avoid or mitigate environmental impacts. Therefore, no consistency analysis is required for purposes of determining potential impacts under this threshold. However, a brief discussion of the Project's consistency with the Zoning Code is provided below for informational purposes.

The Project Site is zoned C1.5-1VL-RIO (Limited Commercial, Height District 1VL, River Improvement Overlay), with the northeast portion of the Project Site adjacent to the Los Angeles River zoned R4P-1VL-RIO (Multiple Dwelling or Parking, Height District 1VL, River Improvement Overly). Pursuant to the LAMC, the C1.5 Zone permits limited commercial uses, including C1 (limited commercial) uses, retail, theaters, hotels, broadcasting studios, parking buildings, parks and playgrounds, and R4 (residential multiple dwelling) uses. The Height District 1VL designation for the C1.5 Zone permits an FAR of 1.5:1 and a height limit of 45 feet. The R4P Zone permits residential multiple dwelling or parking uses, including R4 uses (multiple dwelling), churches, schools, childcare, and homeless shelter uses. The Height District 1VL designation for the R4P Zone permits an FAR of 3:1 and a height limit of 45 feet. These standards are superseded by the more restrictive Specific Plan height and FAR regulations.

Overall, based on the above, the Project would not conflict with the 2020–2045 RTP/SCS, LAMC, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, Ventura–Cahuenga Boulevard Corridor Specific Plan, or the City of Los Angeles General Plan. Therefore, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The cumulative analysis takes into consideration the five related projects within 0.75 mile of the Project Site (listed in Table 35 on page 329 and shown in Figure 16 on page 330 in the analysis further below. The related projects consist of infill development and redevelopment of existing uses. As such, similar to the Project, the proposed construction associated with the related projects would be confined to the related project sites and would not physically divide a community. The uses proposed by the related projects, including mixed-use, commercial, and recreational facilities, would also be compatible with the various uses throughout the Project Site.

In addition, the Project is consistent with applicable goals, objectives, and policies of applicable plans related to avoiding or mitigating environmental effects, including the 2020–2045 RTP/SCS, the General Plan Framework Element, the Community Plan, the LAMC, and the Specific Plan. As with the Project, the related Projects would be required to comply with relevant land use plans, policies, and regulations. Because the approval of the proposed Project would not result in land use and planning impacts, the Project's potential impacts would not be cumulatively considerable. Furthermore, the related projects would also have to demonstrate that they do not conflict with applicable land use plans,

As such, based on the above, cumulative impacts related to the physical division of an established community and cumulative impacts related to conflicts with land use plans, policies, or regulations would be less than significant.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM MIN-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.

b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:

1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.

2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.

3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.

4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.

Applicability to the Project

The Project would not result in the loss of availability of a regionally valuable mineral resource. Therefore, Mitigation Measure PMM MIN-1 is not applicable to the Project.

Impact Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.[120,121,122] In addition, there are no oil fields or oil wells located within a 2,000-foot radius of the Project Site .[123] ***The Project would not result in the loss of availability of a known mineral resource and no impact would occur.***

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral

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120 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1, https://planning.lacity.org/odocument/6aa45676-e431-43ab-8621-dd493e64d2ea/FrameworkFEIR.pdf, accessed April 15, 2022.

121 State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012, www.conservation.ca.gov/cgs/Documents/Publications/Map-Sheets/MS_052_California_Aggregates_Report_201807.pdf, accessed April 2022.

122 City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86, https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed April 15, 2022.

123 State of California Geologic Energy Management Division Well Finder, www.conservation.ca.gov/calgem/Pages/WellFinder.aspx, accessed August 15, 2022.

deposits are known to be present, or within a mineral producing area as classified by the California Geological Survey. The Project Site is also not located within a 2,000-foot radius of an oil field or oil well. ***Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and no impact would occur.***

Cumulative Impacts

Less Than Significant Impact. The five related projects are located within a developed, urbanized area of the City of Los Angeles and do not support existing or future mineral extraction. It is unknown whether or not any of the related project sites contain mineral resources of local or regional importance. Regardless, since the Project would have no impact on the availability of known mineral resources, it would not contribute to a potential cumulative impact. ***As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and there would be no cumulative impact.***

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM NOI-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Install temporary noise barriers during construction.

b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.

c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance.

d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.

e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.

f) Designate an on-site construction complaint and enforcement manager for the project.

g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.

h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.

j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.

k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where repavement is planned.

l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.

m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses.

n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.

o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.

p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.

q) Use of portable barriers in the vicinity of sensitive receptors during construction.

r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.

s) Monitor the effectiveness of noise attenuation measures by taking noise measurements.

t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.

u) Construct sound reducing barriers between noise sources and noise-sensitive land uses.

v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.

w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.

x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.

y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

Applicability to the Project

As described below, the Project does not have the potential to result in significant noise impacts related to off-site construction of the Project or on- or off-site Project operation. However, there is the potential for

significant noise impacts associated with the Project's on-site construction activities. Therefore, SCAG's PMM NOI-1(a), which calls for the installation of temporary noise barriers during construction would be applicable to the Project. However, based on Project-specific analysis of the proposed on-site construction activities as well as the specific locations of off-site noise-sensitive receptors, the Project would incorporate site-specific measures, as outlined in NOI-MM-1, to address the significant on-site construction noise impact. As this measure addresses specific site conditions, it would be consistent with but more effective and tailored to the project than PMM NOI-1 in mitigating the potentially significant impacts. In addition, while other measures included in PMM-NOI-1 would generally be applicable to the Project, the Project would adhere to all relevant regulatory compliance measures regarding noise, including those outlined in the LAMC and the Noise Element of the City of Los Angeles General Plan, which would be equal to or more effective that the measures outlined in PMM NOI-1. Thus, PMM NOI-1 would not be incorporated into the Project.

PMM NOI-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.

b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.

c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.

d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.

e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).

f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

Applicability to the Project

As analyzed below, the Project would not result in significant impacts related to vibration. In addition, the Project would not require pile driving. Thus, while some of the measures outlined in PMM NOI-2 would generally apply to the Project, including the restriction of construction hours and the maintenance of construction equipment, existing regulatory requirements would be equal to or more effective than the measures outlined in PMM NOI-2. Thus, PMM NOI-2 would not be incorporated into the Project.

Impact Analysis

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated.

Applicable Noise Regulations

Chapter XI, *Noise Regulation*, of the LAMC (hereafter referred to as the Noise Regulations) establishes acceptable ambient sound levels to regulate intrusive noises (e.g., noise from stationary mechanical equipment, amplified sound, and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulations, a noise level increase from certain regulated noise sources (e.g., mechanical equipment) of 5 dBA over the existing ambient noise level at an adjacent property line is considered a violation of the Noise Regulations. To account for people's increased tolerance for short-duration noise events, the Noise Regulations provide a 5-dBA allowance (for a total of 10 dBA[124] above the existing ambient noise level) for noise sources occurring for more than 5 but less than 15 minutes in any 1-hour period, and an additional 5-dBA allowance (for a total of 15 dBA above the existing ambient noise level) for noise sources occurring for five minutes or less in any 1-hour period.[125]

Ambient noise is defined by the Noise Regulations as the measured noise level averaged over a period of at least 15 minutes (i.e., L_{eq}).[126,127] For purposes of determining whether or not a violation of the Noise Regulations is occurring, the sound level measurements of the additional noise source are averaged over a minimum 15-minute duration and compared with the baseline ambient noise levels (i.e., without the additional noise source). The ambient noise baseline to be used is either the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. In cases in which the actual measured ambient noise level is unknown, the City's presumed ambient noise level is used as the baseline. The City's presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels for residential use is 50 dBA and 40 dBA, respectively.[128]

Noise due to construction is regulated under Section 41.40 of the LAMC, which prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, on Saturday before 8:00 A.M. and after 6:00 P.M., and at any time on Sunday or a national holiday.[129] In addition, Section 112.05 of the LAMC limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA

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[124] A-weighted decibels, abbreviated dBA, are an expression of the relative loudness of sounds in air as perceived by the human ear. All sound levels measured in decibel (dB or dBA), as identified in the noise calculation worksheets included in Appendix J of this SCEA, are relative to $2x10^{-5}$ N/m^2.

[125] Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).

[126] Los Angeles Municipal Code, Chapter XI, Article I, Section 111.01(a).

[127] Equivalent Sound Level (L_{eq}) is a measurement of the acoustic energy content of noise averaged over a specified time period. Thus, the L_{eq} of a time-varying sound and that of a steady sound are the same if they deliver the same amount of energy to the receptor's ear during exposure.

[128] Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03.

[129] Los Angeles Municipal Code, Section 41.40.

(between 7:00 A.M. and 10:00 P.M.), measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.[130]

Noise due to motor driven vehicles on private property (e.g., parking lot) is regulated under Section 114.02 of the LAMC. In accordance with Section 114.02, the operation of motor driven vehicles upon any property within the City that causes the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA is considered a noise violation.

Noise due to vehicle theft alarm systems (car alarms) is regulated under Section 114.06 of the LAMC, which states that "it shall be unlawful for any person to install, operate or use any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes."

In addition to the Noise Regulations, the Noise Element of the City of Los Angeles General Plan (General Plan) Exhibit I establishes CNEL guidelines for land use compatibility.[131] Per the Noise Element, noise levels between 70 and 75 dBA CNEL are considered "normally unacceptable" and noise levels at 75 dBA CNEL and greater are considered "clearly unacceptable" for residential uses. Noise levels between 55 and 70 dBA CNEL are considered "conditionally acceptable" and noise levels less than 55 dBA CNEL are considered "normally acceptable" for single-family residential uses.

Construction of the Project is anticipated to require approximately 43 months to complete. As described above, the City Noise Regulation limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA, as measured at 50 feet from the source. As indicated above, a significant impact would occur if the Project would result in a substantial temporary or permanent increase in ambient noise levels. With respect to the community noise assessment, changes in noise levels less than 3 dBA are generally not discernable to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase. Therefore, the significance criteria used in the construction noise analysis in this section of the SCEA is an increase in the ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use.

With respect to on-site operation noise, the significance criteria used in the noise analysis is an increase in the ambient noise level of 5 dBA (hourly L_{eq}) at the noise-sensitive uses, in accordance with the Noise Regulations. The Noise Regulations do not apply to off-site traffic (i.e., vehicles traveling on public roadways). Therefore, the City has determined to assess the significance of the Project's off-site traffic noise based on whether the Project creates, or contributes to, an increase in the ambient noise level of 3 dBA in CNEL if the noise levels fall within the "normally unacceptable" or "clearly unacceptable" category, as specified in the City's Noise Element, or an increase of 5 dBA in CNEL if the noise levels fall within the "conditionally acceptable" or "normally acceptable" category at noise-sensitive uses. In addition, the City has determined to assess the significance of the Project's composite noise levels (on-site and off-site sources) based on whether the Project's composite noise levels create an increase in the

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130 In accordance with the City of Los Angeles Noise Regulations (LAMC, Section 112.05), "technically infeasible" means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

131 Noise Element of the Los Angeles City General Plan, February 3, 1999, https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf, accessed April 15, 2022.

ambient noise level of 3 dBA or 5 dBA in CNEL (depending on where in the acceptable/unacceptable categories the noise levels fall) at noise-sensitive uses.

Existing Noise Environment

Some land uses are considered more sensitive to noise than others based on the types of activities typically involved at the receptor location. Similarly, the Noise Element defines noise-sensitive land uses as single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; and parks.[132] Based on a review of the land uses in the vicinity of the Project Site, seven (7) off-site noise receptor locations were selected to represent noise-sensitive uses within 500 feet of the Project Site. These locations represent areas with land uses that could qualify as noise-sensitive uses according to the definition of the General Plan Noise Element. As discussed below, noise measurements were conducted at the seven off-site locations around the Project Site to establish baseline noise conditions in the vicinity of the Project Site. The monitoring locations essentially surround the Project Site and thereby provide representative baseline measurements for uses in all directions. In addition, the monitoring locations provide an adequate basis to evaluate potential impacts at the monitoring locations and receptors beyond in the same direction, as impacts at these receptors would be further reduced due to distance attenuation and intervening building structures.

To establish baseline noise conditions, existing ambient noise levels were monitored at seven off-site receptor locations (identified as receptor locations R1 to R7 in Figure 15 on page 231) that are representative of noise sensitive uses in the vicinity of the Project Site. The baseline noise monitoring program was conducted on June 8, 2021, using a Larson-Davis Model 870 and a Quest Model 2800 sound level meters.[133] Two 15-minute measurements were conducted at the off-site receptor locations R1 through R6, one during the daytime hours between 1:00 P.M. and 3:00 P.M. and one during the nighttime hours between 10:00 P.M. and 12:00 A.M. A 24-hour measurement was conducted at the receptor location R7. The ambient noise measurements were taken in accordance with the City's standards, which require ambient noise to be measured over a period of at least 15 minutes.[134]

The results of the ambient sound measurement data are summarized in Table 16 on page 232. As indicated therein, the existing daytime ambient noise levels at the off-site receptor locations range from 57.8 dBA (L_{eq}) at receptor location R7 to 71.1 dBA (L_{eq}) at receptor location R1. The nighttime ambient noise levels ranged from 49.6 dBA (L_{eq}) at receptor location R7 to 69.6 dBA (L_{eq}) at receptor location R1. Based on field observation and measured sound data, the current ambient noise environment in the vicinity of the Project Site is controlled primarily by vehicular traffic on local roadways (i.e., Ventura Boulevard and Coldwater Canyon Avenue) and, to a lesser extent, helicopter flyovers, and other typical urban noises.

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132 City of Los Angeles General Plan, Noise Element, Chapter IV, p. 4-1.

133 The Larson-Davis Model 870 and Quest Model 2900 sound meter meets the industry standard performance requirements for "Type 1" and "Type 2" standard instruments as defined in the American National Standard Institute (ANSI) S1.4, respectively. It also meets the requirement specified in Section 111.01(l) of the LAMC that instruments be "Type S2A" standard instruments or better. The sound meter was calibrated and operated according to the manufacturer's written specifications.

134 LAMC Section 111.01.

Figure 15
Noise Monitoring Locations

Source, AES, 2021.

Table 16
Existing Ambient Noise Levels

Receptor Location	Approximate Distance to Project Site[a] (feet)	Measured Noise Levels, dBA L_{eq}		CNEL[c] (dBA)
		Daytime Hours[b] (7:00 A.M.–10:00 P.M.)	Nighttime Hours[b] (10:00 P.M.–7:00 A.M.)	
R1 Residential	120	71.1	69.6	76.6
R2 Residential	140	62.9	61.0	68.1
R3 Hotel	415	69.8	66.5	74.0
R4 Residential	345	70.3	61.3	71.7
R5 Residential	260	63.4	51.9	64.0
R6 Residential	225	57.9	54.0	61.7
R7 Residential	145	57.8	49.6	58.9

CNEL = Community Noise Equivalent Level

dBA = A-weighted sound pressure level in decibel

L_{eq} = equivalent sound level

[a] *Distances shown are estimated using Google Earth and are referenced to the nearest boundary of the Project Site.*

[b] *The range of hours for the daytime and nighttime periods shown herein are defined by the LAMC. For receptor locations R1 through R6, daytime ambient noise levels were measured between 10:00 A.M. and 1:00 P.M., and the nighttime ambient noise levels were measured between 10:00 P.M. and 1:00 A.M.*

[c] *Estimated based on short-term (15-minute) noise measurements per FTA procedures, see Appendix X of this SCEA.*

Source: AES, September 2021.

Construction Noise

Construction noise impacts due to on-site construction activities associated with the Project were evaluated by calculating the construction-related noise levels at the closest off-site sensitive receptor locations and comparing these estimated construction-related noise levels to the existing ambient noise levels (i.e., noise levels without construction noise from the Project). Construction noise associated with the Project was projected based on the noise expected to be generated by the different types of Project construction activities anticipated, calculating the anticipated noise levels to be produced by the mix of the Project's construction equipment assumed for all construction activities at the off-site sensitive receptor locations, construction durations, and construction schedule. Project construction is anticipated to span approximately 43 months (from approximately July 2023 through February 2027). Project construction activities would comply with LAMC Section 41.40, which limits construction to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, 8:00 A.M. to 6:00 P.M. on Saturday, and no construction activities on Sunday or a national holiday.

On-Site Construction

The individual pieces of construction equipment anticipated to be used for Project construction produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in Table 17 on page 233. The construction equipment noise levels at a distance of 50 feet

Table 17
Construction Equipment Noise Emission Reference Levels and Usage Factors

Type of Equipment	Acoustical Usage Factor (percent)	Reference Maximum Noise Levels at 50 Feet[a] L_{max} (dBA)
Air Compressor	40	78
Cement and Mortar Mixer	50	80
Compactor	20	83
Concrete Mixer Truck	40	79
Concrete Saw	20	90
Crane	16	81
Drill Rig	20	84
Forklift	10	75
Generator	50	81
Dump/Haul Truck	40	76
Excavator	40	81
Pump	50	81
Roller	20	80
Rubber Tired Loader	40	79
Tractor/Loader/Backhoe	40	80
Delivery Truck	40	74
Welders	40	74

dBA = A-weighted sound pressure level in decibel

L_{max} = maximum sound level

[a] *Construction equipment noise levels are based on FHWA RCNM.*

Source: FHWA Roadway Construction Noise Model User's Guide, Table 1, 2006.

(Referenced Maximum Noise Levels) are based on the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (RCNM, 2006), which is a technical report containing actual measured noise data for construction equipment.[135] These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed).

However, equipment used on a typical construction site often operates under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage.[136]

[135] Federal Highway Administration, FHWA Roadway Construction Noise Model User's Guide, January 2006, www.gsweventcenter.com/Draft_SEIR_References/2006_01_Roadway_Construction_Noise_Model_User_Guide_FHWA.pdf, accessed April 15, 2022.

[136] Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2006, page 7, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

These noise levels are typically associated with multiple pieces of equipment operating simultaneously. Therefore, the construction noise levels at the sensitive receptor locations were calculated based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance.[137] Additional noise attenuation was assigned as the line-of-sight to the Project Site would be interrupted by the presence of existing intervening structures.[138]

Table 18 on page 235 provides the estimated construction noise levels by month at the off-site noise sensitive receptors. The estimated noise levels are based on the major construction equipment (i.e., major noise sources) located at the ground level (e.g., excavator, tractor, loader, backhoe, bore/drill rig, grader, scraper, and bulldozers). Construction activities that would take place at the upper levels of the Project buildings would involve smaller construction equipment (e.g., hand tools), which would generate lower noise levels than the large earth moving equipment at the ground level. Furthermore, Project construction at the upper floors, such as fit-out constructions, typically occurs when the building exterior walls are in-place, which would minimize transmission of construction noise to the exterior. As reported in Table 18, the estimated construction noise levels at the off-site noise sensitive receptors would exceed the 5-dBA over the ambient noise level significance criterion at receptor locations R1, R2, and R5 through R7. Therefore, the Project's potential noise impacts due to on-site construction would be significant prior to mitigation.

During phase 0B of construction, as outlined in Table 18, the northern portion of the Project site would be reconfigured to operate as a temporary surface parking lot that would be accessed from Coldwater Canyon Avenue. Mechanical car parking stackers (127 double and 24 triple stackers) would be used for the temporary parking. Noise levels associated with the parking stackers operation were estimated at the off-site sensitive receptors, based on levels measures from actual car stacker operation. Table 19 on page 236 provides the estimated noise levels from operation of the temporary car parking stackers in the northern portion of the Project Site. As indicated in Table 19, the noise levels from the car stackers would range from 23.5 dBA (L_{eq}) at receptor location R3 to 47.9 dBA (L_{eq}) at receptor location R1, both of which would be well below the existing ambient noise levels. As such, the Project's noise levels at the off-site receptor locations due to the car stackers would be below the significance threshold of 5 dBA (L_{eq}) above existing ambient noise levels. As such, noise impacts due to the operation of the temporary car stackers would be less than significant.

Off-Site Construction Traffic

In addition to on-site construction noise, the Project would generate mobile noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the Project's construction. Off-site construction noise impacts from haul trucks associated with the Project were analyzed using the FHWA's Traffic Noise Model (TNM). The TNM is the current Caltrans standard computer noise model for traffic noise studies. The model allows for the input of roadway, noise receivers, and sound barriers, if applicable. The construction-related off-site truck volumes were obtained from the Transportation Assessment prepared for the Project, which is included in Appendix L of this SCEA. The TNM calculates the hourly L_{eq} noise levels generated by construction-related haul trucks. Noise impacts were determined

[137] Caltrans, Technical Noise Supplement (TeNS), September 2013, Chapter 2.1.4.1, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf, accessed April 15, 2022.

[138] Caltrans, Technical Noise Supplement (TeNS), September 2013, Figure 2-15.

Table 18
On-Site Construction Noise Levels

Receptor Location	Calculated Construction Noise Levels by Month,[a] CNEL (dBA)										Existing Daytime Ambient Noise Levels (L_{eq} (dBA))	Significance Criteria (L_{eq} (dBA))[a]	Maximum Noise Exceedance Above the Criteria (L_{eq} (dBA))	Sig. Impact?
	1–4	5-12	13-19	20-24	25-26	27-28	29-31	32-36	37-40	41-43				
R1	78.7	71.3	69.0	72.6	71.8	78.8	79.6	78.2	77.3	81.2	71.1	76.1	5.1	Yes
R2	76.8	60.1	57.6	61.3	60.6	76.2	77.2	75.4	75.2	79.4	62.9	67.9	11.5	Yes
R3	58.1	57.3	54.7	58.6	58.1	61.0	61.0	61.5	59.7	61.5	69.8	74.8	0.0	No
R4	58.6	59.4	57.0	60.6	59.6	60.2	60.2	61.2	57.5	66.4	70.3	75.3	0.0	No
R5	63.3	63.8	61.6	65.3	63.8	63.4	63.4	64.9	60.7	71.2	63.4	68.4	2.8	Yes
R6	66.5	69.7	67.6	70.7	68.9	68.5	68.5	70.0	66.2	72.6	57.9	62.9	9.7	Yes
R7	75.2	73.4	71.2	74.9	74.7	77.8	77.9	77.9	75.7	78.3	57.8	62.8	15.5	Yes

[a] *Construction activity by month:*

– Months 1–4: Phase 0a Demolition of Existing Hotel; Phase 0b Utility Relocation, and Temp Parking–Parking Stackers.

– Months 5–12: Phase 1a Grading/Export/Shoring for Area 1 (Parking Garage Area); Phase 1a Mat Foundation.

– Months 13–19: Phase 1a Garage to Podium Deck Structure.

– Months 20–24: Phase 1a Garage to Podium Deck Structure, Phase 1a Garage to Podium Deck Interior Build, and Phase 1b Structure.

– Months 25–26: Phase 1a Garage to Podium Deck Interior Build, Phase 1b Structure, and Phase 2 Structure.

– Months 27–28: Phase 1b Structure, Phase 2 Structure, and Phase 3 Demolition, Relocate Parking Stackers to Garage

– Months 29–31: Phase 1b Structure, Phase 2 Structure, Phase 3 AQMD Cleanup, and Phase 3 Grading/Export/Shoring.

– Months 32–36: Phase 1b Structure, Phase 1b Interior Build, Phase 2 Structure, Phase 2 Interior Build, and Phase 3 Structure.

– Months 37–40: Phase 1b Interior Build, Phase 2 Interior Build, and Phase 3 Structure.

– Months 41–43: Phase 3 Structure, Phase 3 Interior Build, Landscape/Hardscape.

Detail calculation worksheets are included in Appendix J of this SCEA.

Source: AES, November 2021.

Table 19
Temporary Parking During Construction Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Temporary Parking, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Significant Impact?
R1	69.6	47.9	69.6	74.6	No
R2	61.0	42.5	61.2	66.0	No
R3	66.5	23.5	66.5	71.5	No
R4	61.3	29.7	61.3	66.3	No
R5	51.9	29.8	51.9	56.9	No
R6	54.0	32.6	54.0	59.0	No
R7	49.6	47.8	51.8	54.6	No

[a] *Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptor plus 5 dBA, per City's Noise Regulations.*

Detail calculation worksheets are included in Appendix J of this SCEA.

Source: AES, November 2021.

by comparing the predicted noise level plus ambient with that of the existing ambient noise levels along the Project's anticipated haul routes.

The major noise sources associated with off-site construction trucks would be from the material delivery/ concrete/haul trucks. Construction haul trucks would travel between the Project Site and US-101. Incoming trucks would travel from US-101, exit onto Coldwater Canyon Avenue, head south on Coldwater Canyon Avenue, turn left into the Project Site, or continue to Ventura Boulevard, turn left onto Ventura Boulevard to the Project Site. Upon departure from the Project Site, trucks would exit the Project Site via Ventura Boulevard or Coldwater Canyon Avenue, turn right onto Ventura Boulevard (if exit onto Ventura Boulevard), turn right onto Coldwater Canyon Avenue, and onto the US-101 Freeway. In addition to the construction trucks, construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends, which would not overlap with the Project construction equipment or trucks. In addition, construction workers would come from various directions to the Project Site.

The peak period (i.e., number of truck trips) of construction with the highest number of construction haul trucks would occur during the site grading and excavation phase. During this phase, there would be a maximum of 295 construction trucks (290 hauls and five deliveries) into and out of the Project Site (equal to 590 total trips) per day. In addition, there would be up to 148 concrete trucks per day during the mat foundation phase (concrete mat and pour days), which would occur over six days (10 hours per day). In addition, there would be approximately 20 to 400 construction workers traveling to and from the Project Site on a daily basis during the various construction phases. Construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends. Therefore, construction worker vehicle noise would not overlap with the Project construction equipment or trucks. In addition, the noise levels generated by worker trips would be lower than the construction trips. Table 20 on page 237 provides the estimated number of construction-related trips and the estimated noise levels along the

Table 20
Off-Site Construction Noise Levels

Construction Month[a]	Maximum Number of Construction Truck Trips		Estimated Project Off-Site Construction Noise Levels, dBA (L_{eq})		Project + Ambient Noise Levels, dBA (L_{eq})		Significance Criteria (L_{eq} (dBA)))		Significant Impact?	
	Per Day	Per Hour	Coldwater Canyon Ave.	Ventura Blvd.[b]	Coldwater Canyon Ave.	Ventura Blvd.	Coldwater Canyon Ave.	Ventura Blvd.	Coldwater Canyon Ave.	Ventura Blvd.
1-4	44	8	57.9	51.4	71.3	63.7	76.1	68.4	No	No
5-12	590	99	68.8	62.3	73.1	65.9	76.1	68.4	No	No
13-19	120	15	60.6	54.1	71.5	63.9	76.1	68.4	No	No
20-24	240	31	63.8	57.3	71.8	64.4	76.1	68.4	No	No
25-26	180	24	62.7	56.2	71.7	64.2	76.1	68.4	No	No
27-28	180	26	63.0	56.5	71.7	64.1	76.1	68.4	No	No
29-31	490	76	67.7	61.2	72.7	65.4	76.1	68.4	No	No
32-36	360	39	64.8	58.3	72.0	64.6	76.1	68.4	No	No
37-40	240	23	62.5	56.0	71.7	64.1	76.1	68.4	No	No
41-43	200	26	63.0	56.5	71.7	64.2	76.1	68.4	No	No

[a] *Construction activity by month:*
– Months 1-4: Phase 0a Demolition of Existing Hotel; Phase 0b Utility Relocation, and Temp Parking-Parking Stackers.
– Months 5-12: Phase 1a Grading/Export/Shoring for Area 1 (Parking Garage Area); Phase 1a Mat Foundation.
– Months 13-19: Phase 1a Garage to Podium Deck Structure.
– Months 20-24: Phase 1a Garage to Podium Deck Structure, Phase 1a Garage to Podium Deck Interior Build, and Phase 1b Structure.
– Months 25-26: Phase 1a Garage to Podium Deck Interior Build, Phase 1b Structure, and Phase 2 Structure.
– Months 27-28: Phase 1b Structure, Phase 2 Structure, and Phase 3 Demolition, Relocate Parking Stackers to Garage.
– Months 29-31: Phase 1b Structure, Phase 2 Structure, Phase 3 AQMD Cleanup, and Phase 3 Grading/Export/Shoring.
– Months 32-36: Phase 1b Structure, Phase 1b Interior Build, Phase 2 Structure, Phase 2 Interior Build, and Phase 3 Structure.
– Months 37-40: Phase 1b Interior Build, Phase 2 Interior Build, and Phase 3 Structure.
– Months 41-43: Phase 3 Structure, Phase 3 Interior Build, Landscape/Hardscape.
Detail calculation worksheets are included in Appendix J of this SCEA.

[b] *There are no noise sensitive uses along the Ventura Boulevard haul route segment; therefore, noise level is estimated at receptor location R5.*

Source: AES, November 2021.

anticipated haul routes. As indicated in Table 20 on page 237, the estimated noise levels generated by construction trucks would be with the existing daytime ambient noise levels along Coldwater Canyon Avenue and Ventura Boulevard. Project construction traffic would not increase ambient noise levels along the anticipated truck routes by 5 dBA, and, as such, construction traffic noise increase would be below the 5-dBA significance threshold. Therefore, temporary noise impacts from off-site construction traffic would be less than significant.

Operational Noise

Noise associated with Project operation would include: (a) on-site stationary source noise, including outdoor mechanical equipment (e.g., HVAC equipment), parking facilities, loading dock and trash compactor operations, and activities within the proposed outdoor spaces; and (b) off-site mobile source (roadway traffic) noise.

On-Site Noise

Mechanical Equipment

The Project would include new air conditioning mechanical equipment (e.g., air ventilation equipment), which would be located at the roof level of the new buildings. Project-related outdoor mechanical equipment would be designed to comply with the City's Noise Regulations (LAMC Section 112.02) to ensure that it would not increase the existing ambient noise levels by 5 dBA. Table 21 on page 239 presents the estimated on-site mechanical equipment noise levels associated with this equipment at the seven off-site receptor locations. As shown on Table 21, the estimated noise levels from the mechanical equipment would range from 36.0 dBA (L_{eq}) at receptor location R3 to 49.3 dBA (L_{eq}) at receptor location R1, which would be well below the existing ambient noise levels. As such, the Project's noise levels due to the mechanical equipment at the off-site receptor locations would be below the significance threshold of 5 dBA (L_{eq}) above existing ambient noise levels. Therefore, noise impacts from the Project's mechanical equipment would be less than significant, and no mitigation is required.

Outdoor Spaces

The Project would include a variety of open spaces throughout the Project Site, including: the open spaces on Parking Level P1, the open air plaza, residential courtyard, open spaces at Buildings 1, 2, and 3 on Level 1, the amenity deck on Level 3 (roof) of Building 3 and the pool deck on Level 7 (roof) of Building 1. Noise levels associated with the outdoor spaces would be created by people talking. A reference noise level of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing potential noise impacts from the outdoor spaces.[139] In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. In addition, the hours of operation for use of the outdoor areas were assumed to be from 8:00 A.M. to 12:00 A.M. An additional potential noise source associated with outdoor spaces would be the use of an outdoor sound system (e.g., music or other sounds broadcast through an outdoor mounted speaker system) at the outdoor spaces. The amplified sound system for use in outdoor areas would be designed so as not to exceed the maximum noise level of 75 dBA L_{eq} at Parking Level P1 outdoor spaces, outdoor door spaces at Buildings 1, 2 and 3, and 80 dBA L_{eq} at the

[139] Cyril M. Harris, *Handbook of Acoustical Measurements and Noise Control, Third Edition*, 1991, Table 16.1

Table 21
Mechanical Equipment Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Project Mechanical Equipment, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Significant Impact?
R1	69.6	49.3	69.6	74,6	No
R2	61.0	47.6	61.2	66.0	No
R3	66.5	36.0	66.5	71.5	No
R4	61.3	44.6	61.4	66.3	No
R5	51.9	46.2	52.9	56.9	No
R6	54.0	45.1	54.5	59.0	No
R7	49.6	47.8	51.8	54.6	No

[a] *Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptor plus 5 dBA, per City's Noise Regulations.*

Detail calculation worksheets are included in Appendix J of this SCEA.

Source: AES, November 2021.

Level 1 open air plaza, residential courtyard, and Level 7 pool deck, thereby ensuring that the amplified sound system would not exceed the significance criteria (i.e., an increase of 5 dBA L_{eq}) at any off-site noise-sensitive receptor location. Table 22 on page 240 presents the anticipated number of people at each of the outdoor spaces and the amplified sound system maximum noise levels.

Table 23 on page 241 presents the estimated noise levels from the Project's outdoor areas at the off-site sensitive receptors, resulting from the use of outdoor areas. As presented in Table 23, the estimated noise levels from the outdoor spaces would range from 37.6 dBA (L_{eq}) at receptor location R3 to 54.8 dBA (L_{eq}) at receptor location R1, which would not result in an exceedance of the significance threshold of 5 dBA over the ambient noise levels. Therefore, the Project's potential noise impacts from the outdoor uses would be less than significant, and no mitigation is required.

Parking

The Project would include approximately 1,385 vehicle parking spaces, consisting of 730 residential spaces and 655 commercial spaces for the Project and the adjacent The Shops Development, that would be contained within three subterranean levels. Sources of noise within the parking garage would primarily include vehicular movements and engine noise, doors opening and closing, and intermittent car alarms. Since the subterranean parking levels would be fully enclosed on all sides, noise generated within the parking garage would be effectively shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. Therefore, the Project's noise impact from the parking facilities would be less than significant.

Table 22
Outdoor Spaces Analysis Assumptions

Outdoor Space	Approximate Area, (sf)	Estimated Total Number of People[a]	Amplified Sound System Levels, (dBA (L_{eq})
Level P1—Open Space West	2,412	161	75 dBA at 15 feet
Level P1—Open Space East	3,520	235	75 dBA at 15 feet
Level 1—Open Air Plaza	11,980	799	80 dBA at 15 feet
Level 1—Residential Courtyard	18,078	1,206	80 dBA at 15 feet
Level 1—Open Space Bldg. 3	2,600	174	75 dBA at 15 feet
Level 1—Open Space Bldg. 1 N	2,269	152	75 dBA at 15 feet
Level 1—Open Space Bldg. 1 S	1,333	89	75 dBA at 15 feet
Level 1—Open Space Bldg. 2 W	1,169	78	75 dBA at 15 feet
Level 1—Open Space Bldg. 2 SW	917	62	75 dBA at 15 feet
Level 3—Amenity Deck Bldg. 3	1,916	128	75 dBA at 15 feet
Level 7—Pool Deck	6,339	423	80 dBA at 15 feet

[a] *Based on maximum 15 square feet per person, per the Building Code.*

Source: AES, September 2021.

Loading and Trash Compactor

The Project loading dock and trash compactor would be located within Level P1 of the subterranean parking structure. Noise sources associated with the loading dock and trash collection area would include delivery trucks and operation of the trash compactor. However, noise levels associated with the loading dock and trash compactor would be contained within the parking garage would be effectively shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. Therefore, the Project's potential noise impacts from loading and trash compactor operations would be less than significant.

Off-Site Traffic Noise

Project-generated traffic noise impacts were evaluated by comparing the increase in noise levels from the "future without project" condition to the "future with project" condition against the Project's significance threshold for off-site traffic noise impacts. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from "existing" conditions to "future with project" conditions to the Project's significance criteria. Traffic noise levels at the off-site noise sensitive receptors were calculated using FHWA's Traffic Noise Model and the Project's traffic volume data.[140,141] The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor.

[140] Federal Highway Administration, Traffic Noise Model (TNM) Version 2.5, 2004.

[141] Gibson Transportation Consulting, Inc., Transportation Assessment for the Residences at Sportsmen's Lodge, November 2021.

Table 23
Outdoor Spaces Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Outdoor Spaces, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Significant Impact?
R1	69.6	54.8	69.7	74.6	No
R2	61.0	49.5	61.3	66.0	No
R3	66.5	37.6	66.5	71.5	No
R4	61.3	46.8	61.5	66.3	No
R5	51.9	53.2	55.6	56.9	No
R6	54.0	50.6	55.6	59.0	No
R7	49.6	52.5	54.3	54.6	No

[a] *Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptor plus 5 dBA, per City's Noise Regulations.*

Detail calculation worksheets are included in Appendix J of this SCEA.

Source: AES, September 2021.

Table 24 on page 242 presents the results of the off-site traffic noise analysis. As shown in Table 24, Project-generated traffic would result in a maximum noise increase of 0.3 dBA CNEL along Coldwater Canyon Avenue (between Moorpark Street and Ventura Boulevard). The estimated noise levels along other analyzed roadway segments would be 0.2 dBA CNEL or lower. In addition, the cumulative traffic volumes would result in a maximum increase of 0.8 dBA CNEL along Coldwater Canyon Avenue (between Moorpark Street and Ventura Boulevard). The estimated noise increase along the analyzed roadway segments would be below the 3-dBA significance threshold under both Project and Cumulative level (applicable to noise levels within the 70 to 75 CNEL (dBA) "normally unacceptable" land use category for residential and school uses). Accordingly, noise increases at receptor locations due to off-site traffic would also be below the significance threshold, as the receptors would be farther away and thus, would have attenuated noise compared to the levels anticipated in Table 24, which are calculated at 10 feet from the edge of roadway. Therefore, off-site traffic noise impacts associated with the Project would be less than significant.

Composite Noise Levels

An evaluation of the Project's composite noise levels, including all Project-related noise sources plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at the off-site noise-sensitive receptor locations. The overall sound environment of the areas surrounding the Project Site would include contributions from each on-site and off-site noise source associated with the operation of the Project. On-site noise sources associated with the Project would include the use of mechanical equipment, loading dock and trash compactor operations, outdoor uses, and parking operations. However, as discussed above the parking levels, loading dock and trash compactor would be located within the subterranean parking structure, which would be effectively shielded to the exterior. Therefore, the composite noise analysis would include the mechanical and outdoor uses and off-site traffic. Table 25 on page 243 presents the estimated composite noise from

Table 24
Off-Site Roadway Traffic Noise Impacts

Roadway Segment	Existing Adjacent Land Use	Calculated Traffic Noise Levels,[a] CNEL (dBA)			Increase in Noise Levels, CNEL (dBA)		Significant Impact?	
		Existing Without Project (A)	Future Without Project (B)	Future With Project (C)	Project Level (C − B)	Cumulative (C − A)	Project Level	Cumulative
Whitsett Avenue								
– Between Valley Spring Ln. and Ventura Blvd.	Residential	69.4	69.9	70.0	0.1	0.6	No	No
Coldwater Canyon Avenue								
– Between Moorpark St. and Ventura Blvd.	Commercial	70.8	71.3	71.6	0.3	0.8	No	No
– Between Ventura Blvd. and Halkirk St.	Commercial	71.5	71.8	71.8	0.0	0.3	No	No
Moorpark Street								
– Between Coldwater Canyon Ave. and Whitsett Ave.	Residential	70.1	70.6	70.6	0.0	0.5	No	No
– Between Fulton Ave. and Coldwater Canyon Ave.	Residential	69.7	70.1	70.1	0.1	0.4	No	No
Ventura Boulevard								
– Between Coldwater Canyon Ave. and Whitsett Ave.	Commercial	71.5	72.2	72.2	0.1	0.7	No	No
– Between Fulton Ave. and Coldwater Canyon Ave.	Hotel	71.3	71.7	71.7	0.1	0.4	No	No

[a] *Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix J of this SCEA.*

Source: AES, September 2021.

Table 25
Composite Noise Levels

Receptor Location	Calculated Project-Related Noise Levels,[a] CNEL (dBA)			Project Composite Noise Levels, CNEL (dBA)	Ambient Noise Levels, CNEL (dBA)	Ambient + Project Noise Levels, CNEL (dBA)	Increase in Noise Levels Due to Project, CNEL (dBA)	Significance Criteria[b]	Significant Impact?
	Traffic	Mechanical	Outdoor Spaces						
R1	59.8	56.0	58.7	63.2	76.6	76.8	0.2	3.0	No
R2	56.1	54.3	53.4	59.9	68.1	68.7	0.6	5.0	No
R3	55.8	42.7	41.5	56.1	74.0	74.1	0.1	3.0	No
R4	48.4	51.3	50.7	55.0	71.7	71.8	0.1	3.0	No
R5	49.3	52.9	57.1	59.0	64.0	65.2	1.2	5.0	No
R6	51.2	51.8	54.5	57.5	61.7	63.1	1.4	5.0	No
R7	39.7	54.5	56.4	58.6	58.9	61.8	2.9	5.0	No

[a] *Detail calculation worksheets are included in Appendix J of this SCEA.*

[b] *Significance criteria are equal to 3 dBA increase in ambient if the estimated noise levels (ambient plus Project) fall within the "normally unacceptable" or "clearly unacceptable" land use categories or 5 dBA increase in ambient if the estimated noise levels fall within the "normally acceptable" or "conditionally acceptable" land use categories, per the City of Los Angeles Noise Element.*

Source: AES, September 2021.

Project-related noise sources in terms of CNEL at the off-site noise sensitive receptors. As reported in Table 25 on page 243, the Project would result in a maximum increase of 2.9 dBA CNEL at receptor location R7. The estimated noise increase at other receptor locations would be 1.4 dBA or lower. The increases in noise levels due to the Project at the off-site receptors would be below the 3 dBA CNEL significance threshold at receptor locations R1, R3 and R4 (applicable to noise level of 70 dBA CNEL or greater at residential uses) and the 5 dBA CNEL significance threshold at receptor locations R2 and R5 through R7 (applicable to noise level less than 70 dBA CNEL at residential uses). Therefore, the composite noise level impacts due to Project operation would be less than significant.

Mitigation Measures

As analyzed above, construction of the Project would have the potential to result in significant noise impacts at the off-site sensitive receptor locations from on-site construction activities. Therefore, the following mitigation measure, consistent with PMM NOI-1(a), is provided to reduce construction-related noise impacts:

NOI-MM-1: Prior to commencement of construction, the Project Applicant shall erect temporary and impermeable sound barriers at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Within the northern portion of the Project Site between the construction areas and the residential uses at receptor locations R1 and R7. The temporary sound barrier shall be designed to provide a minimum 6-dBA and 16-dBA noise reduction, or not to exceed the ambient noise by 5 dBA, at the ground and upper levels of the residential uses at receptor locations R1 and R7, respectively. The temporary sound barrier shall be 24 feet tall in order to block line of sight between the on-site construction activities and off-site sensitive receptors at receptor locations R1 and R7, respectively.
- Within the western portion of the Project Site (along Coldwater Canyon Avenue) between the construction areas and residential use at receptor location R2. The temporary sound barrier shall be designed to provide a minimum 12-dBA noise reduction, or not to exceed the ambient noise by 5 dBA, at the ground and upper levels of receptor location R2. The temporary sound barrier shall be 18 feet tall in order to block line of sight between the on-site construction activities and off-site sensitive receptors at receptor location R2.
- Within the southern portion of the Project Site between the construction areas and residential uses on the south side of Ventura Boulevard, receptor locations R5 and R6. The temporary sound barrier shall be designed to provide a minimum 5-dBA and 10-dBA noise reduction, or not to exceed the ambient noise by 5 dBA at the ground level of receptor locations R5 and R6, respectively. The temporary sound barrier shall be 8 feet tall (at the west end) to 24 feet tall (at the east end) in order to block line of sight between the on-site construction activities and off-site sensitive receptors at receptor locations R5 and R6, respectively.

Implementation of Mitigation Measure NOI-MM-1 would reduce the Project's construction noise levels to the extent feasible. Table 26 on page 245 shows the estimated on-site construction noise levels at the off-site sensitive receptions with implementation of Mitigation Measure NOI-MM-1. As indicated therein,

Table 26
On-Site Construction Noise Levels With Mitigation Measures

Receptor Location	Calculated Construction Noise Levels by Month,[a] CNEL (dBA)										Existing Daytime Ambient Noise Levels (L_{eq} (dBA))	Significance Criteria (L_{eq} (dBA))	Maximum Noise Exceedance Above the Criteria (L_{eq} (dBA))	Sig. Impact?
	1–4	5-12	13-19	20-24	25-26	27-28	29-31	32-36	37-40	41-43				
R1	72.7	65.3	63.0	66.6	65.8	72.8	73.6	72.2	71.3	75.2	71.1	76.1	0.0	No
R2	64.8	48.1	45.6	49.3	48.6	64.2	65.2	63.4	63.2	67.4	62.9	67.9	0.0	No
R3	58.1	57.3	54.7	58.6	58.1	61.0	61.0	61.5	59.4	61.5	69.8	74.8	0.0	No
R4	58.6	59.4	57.0	60.6	59.6	60.2	60.2	61.2	57.5	66.4	70.3	75.3	0.0	No
R5	58.3	58.8	56.6	60.3	58.8	58.4	58.4	59.9	55.7	66.2	63.4	68.4	0.0	No
R6	56.5	59.7	57.6	60.7	58.9	58.5	58.5	60.0	56.2	62.6	57.9	62.9	0.0	No
R7	59.2	57.4	55.2	58.9	58.7	61.8	61.9	61.9	59.7	62.3	57.8	62.8	0.0	No

[a] *Construction activity by month:*

– Months 1–4: Phase 0a Demolition of Existing Hotel; Phase 0b Utility Relocation, and Temp Parking–Parking Stackers.

– Months 5–12: Phase 1a Grading/Export/Shoring for Area 1 (Parking Garage Area); Phase 1a Mat Foundation.

– Months 13–19: Phase 1a Garage to Podium Deck Structure.

– Months 20–24: Phase 1a Garage to Podium Deck Structure, Phase 1a Garage to Podium Deck Interior Build, and Phase 1b Structure.

– Months 25–26: Phase 1a Garage to Podium Deck Interior Build, Phase 1b Structure, and Phase 2 Structure.

– Months 27–28: Phase 1b Structure, Phase 2 Structure, and Phase 3 Demolition, Relocate Parking Stackers to Garage.

– Months 29–31: Phase 1b Structure, Phase 2 Structure, Phase 3 AQMD Cleanup, and Phase 3 Grading/Export/Shoring.

– Months 32–36: Phase 1b Structure, Phase 1b Interior Build, Phase 2 Structure, Phase 2 Interior Build, and Phase 3 Structure.

– Months 37–40: Phase 1b Interior Build, Phase 2 Interior Build, and Phase 3 Structure.

– Months 41–43: Phase 3 Structure, Phase 3 Interior Build, Landscape/Hardscape.

Source: AES, November 2021.

implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would reduce the noise generated by on-site construction activities at the off-site sensitive uses to below the 5-dBA significance threshold. ***As such, the project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impacts would be less than significant with mitigation.***

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

On-Site Construction Vibration

Heavy construction equipment (e.g., a bulldozer and excavator) would generate a limited amount of ground-borne vibration at short distances away from the source. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity to the construction site (i.e., within 20 feet related to building damage; 80 feet related to human annoyance at residential uses).[142] Heavy construction equipment (e.g., a large bulldozer) would generate a vibration level of up to 0.089 inch/second Peak Particle Velocity (PPV) at a distance of 50 feet from the equipment.[143] With respect to potential building damage, the Federal Transit Administration (FTA) provides potential building damage criteria varies from 0.12 PPV (inch/second) for buildings that are extremely susceptible to vibration to 0.50 PPV (inch/second) for reinforced-concrete, steel or timber buildings.[144]

Table 27 on page 247 presents the estimate ground-borne vibration levels due to Project construction activities at the nearest off-site building structures. As indicated in Table 27, the estimated ground-borne vibration levels at the off-site building structures would be below the significance criteria of 0.3 PPV (inch/second) for the residential building to the north, commercial buildings to the south and east, and the 0.5 PPV (inch/second) for the new commercial building to the west. Therefore, the on-site vibration impacts with respect to building damage, during construction of the Project, would be less than significant.

With respect to potential vibration-related human annoyance associated with on-site construction activities, FTA provides ground-borne vibration impact criteria of 72 VdB for residential uses.[145] Table 28 on page 248 provides the estimated vibration levels at the off-site sensitive uses due to construction equipment operation and compares the estimated vibration levels to the specified significance criteria for human annoyance. Per FTA guidance, the significance criteria for human annoyance is 72 VdB for

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[142] Pursuant to FTA procedure, distances are calculated based on estimated vibration levels for typical construction equipment at a distance which would be below the 72 VdB significance threshold with respect to human annoyance (at 80 feet) and below the 0.12 PPV significance threshold applicable to buildings extremely susceptible to vibration damage (at 20 feet).

[143] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-4, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed April 15, 2022.

[144] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-5.

[145] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 6-3.

Table 27
Construction Vibration Impacts—Building Damage

Nearest On-Site and Off-Site Building Structure[a]	Estimated Vibration Velocity Levels at the Outside of and Adjacent to the Nearest Off-Site Structures from the Project Construction Equipment (inch/second (PPV))[b]					Sig. Criteria (PPV)	Sig. Impact?
	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	0.089	0.089	0.076	0.035	0.003	—	—
Residential Building to the North	0.008	0.008	0.006	0.003	<0.001	0.3[c]	No
Commercial Building to the West	0.244	0.244	0.208	0.096	0.008	0.5[d]	No
Commercial Building to the East	0.244	0.244	0.208	0.096	0.008	0.3[d]	No
Commercial Building to the South	0.009	0.009	0.008	0.004	<0.001	0.3[c]	No

[a] *Represents off-site building structures located nearest to the Project Site to the north, south, east, and west.*

[b] *Vibration level calculated based on FTA reference vibration level at 25 foot distance.*

[c] *FTA criteria for engineered concrete and masonry buildings.*

[d] *FTA criteria for reinforced-concrete, steel or timber buildings.*

Source: FTA, 2018; AES, 2021. See Appendix J of this SCEA.

residential uses, assuming there are a minimum of 70 vibration events occurring during a typical construction day. As indicated in Table 28 on page 248, the estimated ground-borne vibration levels from construction equipment would be below the significance criteria for human annoyance at all off-site sensitive receptor locations. Therefore, on-site vibration impacts during construction of the Project, pursuant to the significance criteria for human annoyance, would be less than significant.

Off-Site Construction Vibration

As described above, construction delivery/haul trucks would travel between the Project Site and US-101 Freeway via Coldwater Canyon Street and Ventura. Heavy-duty construction trucks would generate ground-borne vibration as they travel along the Project's anticipated haul route(s). Thus, an analysis of potential vibration impacts using the building damage and human annoyance criteria for ground-borne vibration along the anticipated local haul routes was conducted.

Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck.[146] According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are existing buildings along the Project's anticipated

[146] FTA, Transit Noise and Vibration Impact Assessment, September 2018, Figure 5-4.

Table 28
Construction Vibration Impacts—Human Annoyance

Off-Site Receptor Location	Estimated Vibration Velocity Levels at the Off-Site Sensitive Uses Due to On-Site Construction Equipment Operation[a] (VdB)					Significance Criteria (VdB)	Sig. Impact?
	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	87	87	86	79	58	—	—
R1	66	66	65	58	37	72	No
R2	65	65	64	57	36	72	No
R3	50	50	49	42	41	72	No
R4	49	49	48	41	20	72	No
R5	56	56	55	48	27	72	No
R6	58	58	57	50	49	72	No
R7	62	62	61	54	44	--	No

[a] *Vibration levels calculated based on FTA reference vibration level at 25 distance,*
Source: FTA, 2018; AES, 2021. See Appendix J of this SCEA.

haul route that are situated approximately 20 feet from the right-of-way and would be exposed to ground-borne vibration levels of approximately 0.022 PPV, as provided in the noise calculation worksheets included in Appendix J of this SCEA. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, the Project's vibration impact (pursuant to the significance criteria for building damage) from off-site construction activities would be less than significant.

Per FTA guidance, the significance criteria for human annoyance is 72 VdB for sensitive uses, including residential and hotel uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road.[147] Vibration sensitive uses (i.e., residential) along Coldwater Canyon Avenue and Ventura Boulevard are located a minimum of 30 feet from the traveled lane. The estimated ground-borne vibration level generated by construction truck along Coldwater Canyon Avenue and Ventura Boulevard would be 70 VdB, which would be below the 72-VdB significance threshold with respect to human annoyance. Therefore, the Project's vibration impact (pursuant to the significance criteria for human annoyance) from off-site construction activities would be less than significant.

Operational Groundborne Vibration

The Project's day-to-day operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce

[147] FTA, Transit Noise and Vibration Impact Assessment, September 2018, p. 113.

groundborne vibration and noise. Building mechanical equipment installed as part of the Project would typically include vibration-attenuation mounts to reduce vibration transmission to the building. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Due to the rapid attenuation characteristics of groundborne vibration, vibration due to Project operation at the off-site sensitive receptors would be well below the 72 VdB significance threshold. Therefore, the Project would not result in the generation of excessive groundborne vibration levels at sensitive receptors in the vicinity of the Project site. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.

Based on the above, the project would not result in the generation of excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip. The closest private airstrip or airport is the Bob Hope Airport, which is approximately 4.65 miles northeast of the Project Site. The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. Given the distance between the Project Site and the closest private airstrip and public airport, the Project would not have the potential to expose people that reside or work in the Project Area to excessive noise levels from these sources of noise. ***Therefore, no impacts with respect to Noise Threshold (c) would occur.***

Cumulative Impacts

Less Than Significant Impact. The Project, together with the related projects and future growth, could contribute to cumulative noise impacts. The potential for cumulative noise impacts to occur is specific to the distance between each related project and their stationary noise sources, as well as the cumulative traffic that these projects would add to the surrounding roadway network.

Construction Noise

Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site.[148] Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. As provided under Item XXI, Mandatory Findings of Significance, of this SCEA, five related projects have been identified in the vicinity of the Project Site. Four of the five related projects, Related Project Nos. 1, 2, 3, and 5 are located more than 1,000 feet from the Project. In addition, there are intervening building structures between the Project and these related projects, which would not contribute to the cumulative on-site construction noise impacts. Related Project No. 4 is located adjacent to the Project Site to the west. However, Related Project No. 4 has completed construction and has received a temporary certificate of occupancy, which would therefore not contribute

[148] City of Los Angeles, *L.A. CEQA Thresholds Guide*, Chapter I.1 Construction Noise, Screening Criteria, 2006, https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf, accessed April 15, 2002.

to the cumulative construction noise impacts. Therefore, cumulative on-site construction noise impacts would be less than significant.

In addition to the cumulative impacts of on-site construction activities, off-site construction haul trucks would have a potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul route. Based on the existing daytime ambient noise level of 71.1 dBA (L_{eq}) along Coldwater Canyon Avenue and 63.4 dBA (L_{eq}) at receptor location R5 facing Ventura Boulevard (refer to Table 20 on page 237), it is estimated that up to 358 truck trips per hour along Coldwater Canyon Avenue, and 272 truck trips per hour along Ventura Boulevard per hour would increase the ambient noise levels by 5 dBA and exceed the significance criteria.[149] As indicated above, the Project would generate up to 99 truck trips per hour. Related Project No. 4 has completed construction and as a result would not contribute to the off-site construction haul trucks, as site grading has been completed. Related Project No. 5 would generate up to 10 truck trips per hour during the site demolition and grading phase.[150] There is no available information on the construction truck trips for the Related Project Nos. 1, 2 and 3. However, the number of truck trips per hour associated with Related Project Nos. 1, 2 and 3 would likely be less than the Project, as the overall site and development areas for the Related Project Nos. 1, 2 and 3 are less than the Project. Therefore, the cumulative total truck trips would likely not reach 358 truck trips or 272 truck trips per hour along Coldwater Canyon Avenue and Ventura Boulevard, respectively. As such, cumulative off-site construction noise impacts would be less than significant.

Operation Noise

The Project Site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from a number of community noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. Similar to the Project, each of the related projects that have been identified in the vicinity of the Project Site would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. All related projects are of a residential, retail, or commercial, and these uses are not typically associated with excessive exterior noise levels. However, each project would produce traffic volumes that are capable of generating roadway noise impacts. The potential cumulative noise impacts associated with on-site and off-site noise sources are addressed below.

Due to provisions set forth in the LAMC that limit stationary source noise from items such as rooftop mechanical equipment, noise levels would be less than significant at the property line for each related project. In addition, as discussed above, noise impacts associated with operations within the Project Site would be less than significant. Therefore, based on the distance of the related projects from the Project Site and the operational noise levels associated with the Project, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

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[149] It is estimated that with 358 truck trips, the noise level along Coldwater Canyon Avenue would be 74.4 dBA, when added to the existing ambient of 71.1 dBA the cumulative noise levels would be 76.1 dBA, which would increase the ambient by 5.0 dBA. Similarly, it is estimated that with 272 truck trips, the noise level at receptor R5 facing Ventura Boulevard would be 66.7 dBA, and when added to the existing ambient of 63.4 dBA the cumulative noise level would be 68.4 dBA, which would increase the ambient by 5.0 dBA.

[150] City of Los Angeles, Studio City Senior Living Center Project EIR, Appendix N Construction Traffic Analysis, 2014.

The Project and related projects in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from "Existing" conditions to "Future Plus Project" conditions to the applicable significance criteria. Future Plus Project conditions include traffic volumes from future ambient growth, related projects, and the Project. The calculated traffic noise levels under "Existing" and "Future Plus Project" conditions are presented in Table 24 on page 242. As shown therein, the cumulative traffic volumes would result in a maximum increase of 0.8 dBA CNEL along Coldwater Canyon Avenue (between Moorpark Street and Ventura Boulevard). The estimated noise increase along the analyzed roadway segments would be below the 3-dBA significance threshold (applicable to noise levels within the 70 to 75 CNEL (dBA) "normally unacceptable" land use category for residential and school uses). Therefore, cumulative noise impacts due to off-site mobile noise sources associated with the Project, future growth, and related projects would be less than significant.

Vibration

Ground-borne vibration decreases rapidly with distance. Therefore, potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in proximity to the construction site (i.e., within 20 feet as related to building damage at historic structures, 80 feet as related to human annoyance).[151] As indicated above, Related Project Nos. 1 through 4 are located more than 1,000 feet from the Project Site, which would not contribute to the cumulative construction vibration impacts. The nearest related project (Related Project No. 4) has completed construction and therefore would not contribute to the cumulative construction vibration impacts. Therefore, cumulative vibration impacts due to on-site construction would be less than significant.

Trucks from the related projects are expected to generate similar ground-borne vibration levels as the Project along the anticipated haul routes, including, Coldwater Canyon Avenue and Ventura Boulevard. As analyzed above, vibration levels generated by haul trucks along the haul routes would be below the significance criteria for both building damage and human annoyance. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul routes would be below the building damage significance criteria of 0.12 PPV (for buildings extremely susceptible to vibration) and the human annoyance criteria of 72 VdB (at residential use). Therefore, the cumulative vibration impact from off-site construction would be less than significant.

Based on the above, cumulative noise impacts associated with on-site and off-site construction noise, on-site and off-site operation noise, and on-site and off-site vibration would be less than significant.

[151] Pursuant to FTA procedure, distances are calculated based on estimated vibration levels for typical construction equipment at a distance which would be below the 72 VdB significance threshold with respect to human annoyance (at 80 feet) and below the 0.12 PPV significance threshold applicable to buildings extremely susceptible to vibration damage (at 20 feet).

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM POP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.

b) Prioritize the use existing ROWs, wherever feasible.

c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.

d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable).

e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.

Applicability to the Project

As discussed below, the Project would not displace any existing housing units. Therefore, PMM POP-1 is not applicable to the Project.

Impact Analysis

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project includes the development of three new buildings that would include 520 residential units, including 78 Very Low-Income affordable units (i.e., 15 percent of the total units), 18,019 square feet of restaurant uses, and 27,926 square feet of retail uses. The construction of new residential units would increase the residential population within the Project Site and vicinity.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. With regard to future growth, SCAG's 2020–2045 RTP/SCS, which was approved by SCAG's Regional Council on September 3, 2020, provides population, housing, and employment projections for cities under its jurisdiction through 2045. The growth projections in the 2020–2045 RTP/SCS reflects the 2017 American Community Survey, employment data from the California Employment Development Department, population, and household data from the California Department of Finance, and extensive input from local jurisdictions in SCAG's planning area. The Project Site is located in SCAG's City of Los Angeles Subregion.

According to SCAG's 2020–2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2020 is approximately 4,049,317 persons.[152] As projected by the 2020–2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,193,714 persons in 2027, the projected occupancy year of the Project.[153] Therefore, the projected population growth between 2020 and 2027 is approximately 144,397 persons. Based on a household size factor of 2.25 persons per market rate multi-family dwelling unit and 3.14 persons per affordable housing (family) dwelling unit, the Project could generate a new residential population of approximately 1,240 residents.[154] The estimated 1,240 new residents generated by the Project would represent approximately 0.86 percent of the population growth forecasted by SCAG's 2020–2045 RTP/SCS in the City of Los Angeles Subregion between 2020 and 2027. The Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be well within SCAG's 2020–2045 population projection for the City of Los Angeles Subregion.

According to the 2020–2045 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2020 is approximately 1,425,759 households.[155,156] As projected by the 2020–

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[152] Based on a linear interpolation of SCAG's 2012–2040 data, the 2020 values for population, housing, and employment are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2027.

[153] Based on a linear interpolation of SCAG's 2012–2040 data, the 2020 values for population, housing, and employment are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2027.

[154] City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1, accessed April 15, 2022.

[155] Based on a linear interpolation of SCAG's 2012–2040 data, the 2020 values for population, housing, and employment are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2027.

2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have approximately 1,528,586 households in 2027, the projected occupancy year of the Project.[157] Therefore, the projected household growth in the City between 2020 and 2027 is approximately 102,827 households. The Project's 520 residential households added by the Project would constitute approximately 0.5 percent of the housing growth forecasted between 2020 and 2027 by SCAG's 2020–2045 RTP/SCS. The Project would also assist the City in meeting its fair share of regional housing need, provide new housing opportunities, and conform to City and regional policies supporting higher density, compact, infill housing development in an area well-served by transit. Therefore, the Project's households would be well within SCAG's 2020–2045 household projection for the City of Los Angeles Subregion.

In addition to the residential population, operation of the Project would generate new employment positions, which could result in increased population growth in the area. The Project's 18,019 square feet of restaurant uses and 27,926 square feet of retail uses would generate approximately 128 new employees based on employee generation rates developed by the LADOT.[158]

According to the 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2020 is approximately 1,887,969 employees.[159] In 2027, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,957,389 employees in 2027, the projected occupancy year of the Project.[160] Therefore, the projected employment growth in the City between 2020 and 2027 based on SCAG's 2020–2045 RTP/SCS is approximately 69,420 employees. Thus, the Project's estimated 128 new employees would constitute approximately 0.18 percent of the employment growth forecasted between 2020 and 2027.

The provision of new jobs would constitute a small percentage of employment growth. It would not be considered "unplanned growth" and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles

(Footnote continued from previous page)

156 SCAG forecasts "households," not housing units. As defined by the U.S. Census Bureau, "households" are equivalent to occupied housing units.

157 Based on a linear interpolation of SCAG's 2012–2040 data, the 2020 values for population, housing, and employment are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2027.

158 Los Angeles Department of Transportation and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the employee generation rate of 2 employees per 1,000 square foot for "General Retail" and employee generation rate of 4 employees per 1,000 square foot for "Quality Restaurant."

159 Based on a linear interpolation of SCAG's 2012–2040 data, the 2020 values for population, housing, and employment are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2027

160 Based on a linear interpolation of SCAG's 2012–2040 data, the 2020 values for population, housing, and employment are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2027

Subregion. Therefore, the Project would not induce substantial unplanned population or housing growth, and impacts would be less than significant.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is currently developed with the Sportsmen's Lodge Hotel, associated facilities, and surface parking. As no housing currently exists on the Project Site, the Project would not cause the displacement of any persons, housing, or require the construction of housing elsewhere. ***Therefore, no impacts related to displacement of people or housing would occur.***

Cumulative Impacts

Less Than Significant Impact. The cumulative analysis takes into consideration the five related projects within 0.75 mile of the Project Site (listed in Table 35 on page 329 and shown in Figure 16 on page 330 in the analysis further below). Of the related projects, three involve a mix of uses, including residential. However, these related projects are not of a scale that would result in an exceedance of SCAG's projection populations, as they would include a relatively small amount of housing units. Furthermore, as discussed above, the Project would not induce population growth beyond that included in the SCAG 2045 population projections contained in the 2020–2045 RTP/SCS. ***As such, the Project would not directly or indirectly contribute to significant cumulative impacts associated with population and housing, and cumulative impacts would be less than significant.***

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new

emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description.

b) Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts.

c) Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.

Applicability to the Project

As analyzed below, existing facilities are capable of providing acceptable fire and emergency response services for the Project. Furthermore, the Project would be subject to existing regulations included in the City's Fire Code and LAMC related to emergency access. In addition, consistent with PMM PSP-1(c), the Project would include Project Design Feature TR-PDF-2, which requires the preparation and implementation of a Construction Traffic Management Plan, which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Adherence to applicable regulatory measures and incorporation of Project Design Feature TR-PDF-2- would be equal to or more effective than PMM PSP-1, and thus, it would not be applicable to the Project.

PMM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.

Applicability to the Project

Consistent with PMM PSS-1 and as discussed below, the Project Applicant shall pay required school fees to the Los Angeles Unified School District pursuant to SB 50. As the existing regulatory requirement requiring the payment of school fees would be equal to or more effective than PMM PSS-1, this measure is not applicable to the Project.

PMM PSL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or

altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.

Applicability to the Project

Consistent with the above measure, the Los Angeles Public Library (LAPL) was contacted, the results of which determined the Project Applicant would be required to pay a per capita fee to the LAPL to be used to offset the Project's potential incremental increased demand for library facilities and services. Although the Project would be consistent with PMM PSL-1, no impacts would occur, so PMM PSL-1 is not applicable to the Project.

Impact Analysis

a. Fire Protection?

Less Than Significant Impact. The analysis below relies on the following metrics from the LAFD to assess potential demands on fire protection and emergency medical services: the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels; response distances, emergency access, and response times; and fire flow requirements. The analysis is based, in part on information available on the LAFD website; information obtained through consultation with the LAFD in written correspondence dated March 3, 2022 (included in Appendix K of this SCEA), and the Utility Infrastructure Technical Report dated May 2022 (included in Appendix N of this SCEA).

LAFD provides fire protection and emergency medical services for the Project Site. The Project Site is located within LAFD's Valley Bureau, which encompasses the entire San Fernando Valley portion of Los Angeles. In their written correspondence, LAFD identified five fire stations that would provide initial response in the Project area. The fire station closest to the Project Site is Fire Station No. 78, located at 4041 Whitsett Avenue, approximately 0.6 mile east of the Project Site, which is the designated "first in" station. In addition, Fire Station No. 108 is located approximately 2.0 miles south of the Project Site; Fire Station No. 102 is located approximately 2.4 miles northwest of the Project Site, Fire Station No. 86 is located approximately 3.2 miles east of the Project Site; and Fire Station No. 60 is located approximately 3.8 miles northeast of the Project Site.[161] According to LAFD, based on response distance from existing fire stations, fire protection for the Project Site would be considered adequate.[162] As previously noted, the Project Site is located in a Very High Fire Hazard Severity Zone.[163]

[161] Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 3, 2022. See Appendix K of this SCEA.

[162] Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 3, 2022. See Appendix K of this SCEA.

[163] City of Los Angeles, Safety Element of the City of Los Angeles General Plan, 2021.

Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.[164] Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[165] Project construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Project construction could also potentially impact the provision of existing LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, as discussed under Item XVII, Transportation, construction activities would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Therefore, although construction activities would be short-term and temporary for the area, those activities could temporarily impact emergency access. While most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction would require a temporary closure of the sidewalks adjacent to the Project Site. A Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-2 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The plans would be prepared by the Applicant for approval by LADOT prior to the issuance of any construction permits and would provide a detour plan and a staging plan. In addition, the plans would specify the details of any sidewalk or lane closures as well as traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The Applicant would coordinate plan details with emergency services and affected transit providers to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

Thus, based on the above, Project construction would not affect fire protection services to the extent that new or physically altered fire facilities would be needed in order to maintain acceptable service ratios, response distances, or other performance objectives for fire protection services. Therefore, construction-related impacts on fire protection would be less than significant.

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[164] United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed June 4, 2021.

[165] United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed June 4, 2021.

Operation

Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 78, the "first-in" station for the Project Site, located approximately 0.6 mile east of the Project Site. As such, as described below, Fire Station No. 78 falls within the required 1.0-mile engine company and 1.5-mile truck company response distances from the Project Site and would be available to serve the Project in the event of an emergency. The Project Site is currently occupied by a five-story hotel (Sportsmen's Lodge Hotel) and associated facilities as well as surface parking areas. As discussed in Part 3, Project Description, of this SCEA, the proposed Project involves the development of 520 residential units, including 78 Very Low-Income affordable units (i.e., 15 percent of the total Project units), 18,019 square feet of restaurant uses, 27,926 square feet of retail uses, and 64,151 square feet of residential amenity and accessory space. As discussed under Item XIV, Population and Housing, implementation of the Project would result in 1,240 new residents and 128 new employees, which would result in an increase in the on-site service population within the service area of Fire Station No. 78.

While the Project's residential and employee population would increase the demand for LAFD fire protection and emergency medical services, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communication systems etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118 and which are required prior to the issuance of a building permit. The Project would provide all applicable life safety features, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety inspection for the Project would ensure that adequate fire prevent features would be provided that would reduce the demand on LAFD facilities and equipment without creating the needs for new facilities. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station. In addition, as confirmed in the written correspondence from the LAFD, the City and LAFD would continue to monitor the demand for existing and projected fire facilities and coordinate the development of new fire facilities to be phased with growth . As such, Project impacts with regard to LAFD facilities and equipment would be less than significant.

Response Distance, Emergency Access, and Response Times

As described in Section 3, Project Description, of this SCEA, vehicular access to the Project Site would be provided via one two-way vehicular ramp along Coldwater Canyon Avenue located in the northwest corner of the Project Site and a two-way ramp along Ventura Boulevard located in the southeast corner of the Project Site. Both ramps would provide access to residential and commercial subterranean parking levels. Emergency vehicle access would be provided via a driveway from Ventura Boulevard along the eastern boundary of the Project Site. The addition of Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties. However, the area surrounding the Project Site includes an established street system and, as discussed in the

Transportation Assessment included in Appendix L of this SCEA, traffic generated by the Project would not result in significant impacts to the Project area intersections, including intersections along the City-designated disaster routes along Ventura Boulevard. In addition, operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access to the Project Site. Furthermore, the Project would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. Furthermore, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or diving in the lanes of opposing traffic, pursuant to California Vehicle Code (CVC) Section 21806.

Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle response times to the Project Site and/or surrounding area. Furthermore, compliance with applicable City Building Code and Fire Code requirements regarding site access would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Therefore, emergency access to the Project Site and surrounding area would be provided and/or maintained, and Project impacts with regard to emergency access would be less than significant.

Fire Flow

Fire flow to the Project would be required to meet City fire flow requirements. The City of Los Angeles Fire Code (LAMC Section 57.507.3.1) establishes fire flow standards by development type. As indicated by the LAFD in their written correspondence provided in Appendix K of this SCEA, the required fire flow for the Project Site has been determined to be 9,000 gallons per minute (gpm) from four to six fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi), which corresponds to the Industrial and Commercial Category.[166]

As discussed in the Utility Infrastructure Report included in Appendix N of this SCEA, an Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated needs. Based on the completed IFFAR (included as Exhibit 3 of Appendix N of this SCEA), the six existing fire hydrants near the Project Site can provide a combined 9,000 gpm with the six fire hydrants flowing simultaneously. Therefore, based on the IFFAR, there is adequate fire flow and pressure available for the Project to comply with the fire flow requirements pursuant to LAMC Section 57.507.3.[167]

As described above and in the Utility Infrastructure Report, there are currently six existing fire hydrants located near the Project Site. The number and location of any additional fire hydrants that may be required would be determined as part of LAFD's fire/life safety plan review for the Project. Furthermore, the Project would incorporate a fire sprinkler suppression system in the proposed buildings, which would be subject to LAFD review and approval during the design and permitting of the Project. This system

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[166] Pursuant to LAMC Section 57.507.3, the required fire flow for the High Density Residential and Neighborhood Commercial land use category is 4,000 gpm from four fire hydrants flowing simultaneously. However, LAFD indicated a higher required fire flow for the Project of 9,000 gpm from four to six hydrants flowing simultaneously, which is what is analyzed herein.

[167] KPFF Consulting Engineers, Sportsmen's Lodge Residential Phase, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, May 2022

would serve to reduce the Project's public hydrant demand. Per LAMC Section 94.2020.0, which adopts National Fire Protection Association (NFPA) standards, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. The Service Advisory Request (SAR) response from LADWP (refer to Exhibit 2 of the Utility Infrastructure Report) shows that the domestic and fire water service off Ventura Boulevard has a static pressure of 136 psi and a flow of up to 2,500 gpm that can be delivered with a residual pressure of 131 psi. This confirms there is sufficient pressure to serve the Project. Thus, as shown by the IFFAR and SAR, there is adequate water pressure available to operate the proposed fire sprinkler suppression system and otherwise meet the Project's fire flow requirements. As such, fire flow impacts to the LADWP's water infrastructure capacity would be less than significant. Therefore, with compliance with LAFD and LADWP requirements, the Project's impacts with regard to fire flow would be less than significant.

Based on the analysis above, Project construction and operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service and would not inhibit emergency response. Therefore, construction and operation of the Project would not result in substantial adverse impacts associated with the provision of a new physically altered governmental facility, the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection and emergency medical services, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative impact analysis for fire protection are the service areas of Fire Station Nos. 78, 108, 102, 86, and 60. The increase in development and residential service populations from the Project, related projects, and other future development in the service areas of the above-mentioned fire stations would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects and other future development projects in the Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented. Furthermore, each related project and other future development projects would be required to comply with regulatory requirements related to fire protection services. In addition, the Project, related projects, and other future development projects would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Furthermore, given that the Project Site is located within an urban area, each of the related projects, as well as other future developments, would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations.

In addition, as with the Project, the related projects and other future development projects in the vicinity, would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate.[168] Cumulative increases in demand for fire protection services due to related projects and other future development projects would be identified and addressed through the City's annual

[168] City of Los Angeles, Proposed Budget for the Fiscal Year 2020–2021, https://cao.lacity.org/budget20-21/2020-21Proposed_Budget.pdf, accessed April 15, 2022.

programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station, would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. Thus, ***compliance with LAFD, City Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

b. Police Protection?

Less Than Significant Impact.

The Project Site is located within the Valley Bureau of the LAPD, which covers a territory of approximately 226.47 square miles with a population of approximately 1.8 million people.[169] The Valley Bureau is the largest geographic bureau in the LAPD, overseeing operations in the North Hollywood, Devonshire, Foothill, Mission, Topanga, Van Nuys, and West Valley Divisions. The Project Site is located within the North Hollywood Division of the Valley Bureau. The North Hollywood Community Police Station is located at 11640 Burbank Boulevard, approximately 2.32 miles northeast of the Project Site. The North Hollywood Community Police Station covers approximately 25 square miles and serves approximately 220,000 residents. The North Hollywood Community Police Station has approximately 300 sworn officers and 31 civilians, as well as 32 reserve officers and 28 citizen volunteers.[170]

Construction

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the North Hollywood Division. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, the Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction.

Project-related construction vehicles would have the potential to increase emergency vehicle response times within the North Hollywood Division due to travel time delays cause by construction traffic. Specifically, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as

[169] LAPD, About Valley Bureau, https://lapdonline.org/valley_bureau/content_basic_view/1921, accessed August 9, 2021.

[170] LAPD, About North Hollywood, https://lapdonline.org/north_hollywood_community_police_station/content_basic_view/1816, accessed September 20, 2021.

discussed under Item XVII, Transportation, of this SCEA, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-2, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction traffic management plan would be developed in consultation with the LADOT and may include narrowing lanes adjacent to the Project Site and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, construction-related traffic generated by the Project would not significantly impede the ability of the LAPD to respond to emergencies in the Project Site vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Thus, impacts on police protection services during Project construction would be less than significant.

Operation

The Project Site is currently occupied by a five-story hotel and associated facilities as well as surface parking areas. The proposed Project involves the development of 520 residential units, including 78 Very Low-Income affordable units (i.e., 15 percent of the total Project units), 18,019 square feet of restaurant uses, 27,926 square feet of retail uses, and 64,151 square feet of residential amenity and accessory space. Thus, the Project would introduce a new residential population to the North Hollywood Division.[171] As previously discussed, the Project Site is under the jurisdiction of the LAPD's North Hollywood Community Police Station, which is staffed by approximately 300 sworn officers and 31 civilians, as well as 32 reserve officers and 28 citizen volunteers. The North Hollywood Community Police Station has a service population of approximately 220,000 residents. As discussed above under Item XIV, Population and Housing, implementation of the Project would result in 1,240 new residents and 128 new employees, which would result in a net police service population of 1,341 person. This would increase the existing LAPD service population in the North Hollywood Division from approximately 220,000 persons to approximately 221,341 persons. With the increase in the police service population, the officer-to-resident ratio for the North Hollywood Division would be reduced from approximately one officer for every 733 residents[172] to approximately one officer for every 738 persons.[173] This ratio would continue to be higher than the Citywide ratio of one officer for every 391.4 residents. However, the Project would not cause a substantial change in the officer-to-resident ratio for the North Hollywood Community Police Station.

As outlined below in Project Design Features POL-PDF-2 through POL-PDF-6, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a closed-circuit camera system and keycard entry for the residential uses and resident parking areas. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of buildings and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the buildings. The Project would also design entrances to, and exits from, the building and open spaces areas, to be open and in view of

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171 The LAPD considers the residential population within their service area to evaluate service capacity. However, in addition to the Project's residential population, this analysis also considers the Project's daytime employee population to provide a conservative analysis of Project-level impacts.

172 220,000 residents ÷ 300 officers = 733.33 officer per resident = 1 officer for every 733 residents.

173 221,341 total Project daytime population ÷ 300 officers = 737.80 officers per person = 1 officer for every 738 persons.

surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Feature POL-PDF-6, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police response. The Project's design features, would help offset the Project-related increase in demand for police services. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. The Project's design features as well as the Project's contribution to the General Fund would help offset the Project-related increase in demand for police services. Therefore, the Project's impact on police services would be less than significant.

The Project would introduce new uses to the Project Site that would generate additional traffic in the Project vicinity. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial increase in emergency response times due to traffic congestion. In addition, operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion.

The Project does not include uses that would require additional specialized police facilities, such as military facilities, hazardous materials, or other uses that may warrant such facilities. Furthermore, as described under Subsection 3.b., consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, based on the above analysis, the Project would not generate a demand for new LAPD facilities to serve the Project Site and, therefore, LAPD concluded the Project will not result in the need for new or altered police facilities.

Project Design Features

The Project would implement the following Project Design Features:

POL-PDF-1: During construction, the Applicant will implement temporary security measures including security fencing, lighting, and locked entry.

POL-PDF-2: The Project will include a closed-circuit camera system and keycard entry for the residential uses and resident parking areas.

POL-PDF-3: The Project will provide proper lighting of the buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between subterranean parking areas and points of entry into the buildings.

POL-PDF-4 The Project will provide sufficient lighting of the subterranean parking areas to maximize visibility and reduce areas of concealment.

POL-PDF-5 The Project will design entrances to, and exits from, the building and open space areas to be open and in view of surrounding areas.

POL-PDF-6 Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's North Hollywood Division Commanding Officer that includes access routes and any additional information that might facilitate police response.

Overall, based on the above, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts. Thus, impacts with regard to police protection services and facilities would be less than significant.

Cumulative Impacts

Less Than Significant Impact. All of the related projects outlined in Table 35 on page 329 and shown in Figure 16 on page 330 in the analysis further below fall within the boundaries of the North Hollywood Division, and three include residential uses. It is anticipated that the Project in combination with the related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. ***Therefore, the cumulative impact on police protection services would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

c. Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD) and would be served by Dixie Canyon Community Charter (0.71 mile west), Robert A Millikan Affiliated Charter and Performing Arts Middle School (1.46 miles northwest), and North Hollywood Senior High (1.91 miles northeast).[174]

Construction

There are no schools in the direct vicinity of the Project Site. As such, there would be no impacts during construction related to school access, traffic, or student safety. Regardless, pursuant to TR-PDF-2,

[174] Los Angeles Unified School District, Resident School Identifier, https://rsi.lausd.net/ResidentSchoolIdentifier/, accessed February 4, 2021.

through implementation of a Construction Traffic Management Plan, adequate and safe access would remain available within and near the Project Site during construction activities.

Operation

The Project would directly generate students through the construction of 520 residential uses. As noted above, the Project would also include development of commercial uses, including retail and restaurant uses. While unlikely given the nature of this employment, the Project's commercial component could generate students as employees of the commercial uses may relocate to the Project Site vicinity. However, it is more likely that these jobs would be filled by existing residents who already generate a demand for school facilities in the area. Using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate approximately 206 new students consisting of 112 elementary school students, 30 middle school students, and 64 high school students.[175]

In addition, pursuant to Senate Bill (SB) 50, the Applicant would be required to pay state-mandated school impact fees to LAUSD prior to issuance of a building permit. Pursuant to Section 65995(3)(h) of the California Government Code (SB 50, chaptered August 27, 1998), the payment of statutory fees "… is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization***."***

Overall, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Thus, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Each of the five related projects within 0.75 mile of the Project Site are located within the boundaries of LAUSD, and three of the five projects would include a residential component. As discussed above, in accordance with SB 50, payment of developer impact fees would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, the related projects would be required to pay school fees to the appropriate school district wherein their site is located. The payment of school fees would fully mitigate any potential impacts to school facilities. ***Therefore, cumulative impacts associated with schools would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

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[175] Based on student generation factors provided in the 2020 LAUSD Developer Fee Justification Study, March 2020. For residential uses, the following student generation rates were used: 0.2269 student per household (Grades K-6), 0.0611 student per household (Grades 7-8), and 0.1296 student per household (Grades 9-12). For Commercial uses, the student generation rate of 0.000638 student per sf for Neighborhood Shopping Centers, and for the existing Hotel use to be removed, the student generation rate of 0.000266 students per sf for Lodging was used. Since the LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school).

d. Parks?

Less Than Significant Impact.

Construction

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project because construction workers move from construction site to construction site throughout the region as specific jobs are temporary/short-term in nature. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

During Project construction, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is a potential for construction workers to spend their lunch breaks at parks and recreational facilities that may be located in proximity to the Project Site, specifically Studio City Recreation Center, at 12621 Rye Street, approximately 0.46 mile north of the Project Site. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes).

As such, there would be no impact related to construction activities, as construction workers would not demand and utilize parks services, and no facilities would be burdened such that new or expanded facilities would be required.

Operation

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the City of Los Angeles Department of Recreation and Parks (RAP). Nearby parks and recreational facilities within an approximately 2-mile radius of the Project Site include: Studio City Recreation Center (located 0.46 mile north of the Project Site); Wilacre Park (located 0.93 mile southeast of the Project Site); Moorpark Park (located 0.96 mile northwest of the Project Site); Coldwater Canyon Park (located 1.18 miles south of the Project Site); Valley Village Park (located 1.98 miles northeast of the Project Site); Van Nuys Sherman Oaks Tennis Courts (located 1.99 miles northwest of the Project Site); Van Nuys Sherman Oaks Pool (located 1.99 miles northwest of the Project Site); and Van Nuys Sherman Oaks Recreation Center (1.99 miles northwest of the Project Site).[176]

[176] City of Los Angeles Department of Recreation and Parks, Facility Map Locator, www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.1456553&geo[longitude]=-118.4119646&address=12825%20Ventura%20Blvd,%20Studio%20City,%20CA%2091604,%20USA, accessed June 4, 2021.

As discussed in Part 3, Project Description, of this SCEA, the Project proposes 520 residential units, 27,926 square feet of retail space, and 18,019 square feet of restaurant space. An increase in the use of existing parks and recreational facilities is directly associated with an increase in the population. As outlined under Item XIV, development of the proposed 520 residential units would result in an approximately 1,240 residents. The Project would provide common and private open space areas throughout the Project Site consisting of 79,366 square feet, including approximately 52,520 square feet of exterior common open space, approximately 14,296 square feet of interior common space, and approximately 12,550 square feet of private open space. Approximately 21,039 square feet of the exterior common open space would be accessible to the public. The ground-floor publicly accessible open space would consist of plazas, courtyards, and other passive gathering areas. In addition, a direct connection between the Project Site and the Los Angeles River Path would be provided via a landscaped terrace, thus enhancing access to an existing open space resource. Residential amenities would be provided to serve the needs of the Project's residents, and would include a pool and deck on the roof (Level 7) of Building 1 and an amenity deck overlooking the Los Angeles River on the roof (Level 3) of Building 2. Overall, the Project's proposed open space would exceed the requirements of the LAMC.

Due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, it is anticipated that Project residents would often utilize on-site open space to meet their recreational needs. While the Project's residents, visitors, and some of the new employees would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Therefore, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities. However, compliance with regulatory requirements, including the payment of park fees pursuant to LAMC Section 12.33 (currently $7,251 per market rate residential unit based on 2021 rates) would ensure that the Project's potential impacts on parks would not be significant.[177]

Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities and would not require the provision of new or physically altered parks and recreational facilities, the construction of which could cause significant environmental impacts. The payment of in-lieu fees in order to fulfill the Project's obligations under the provisions of LAMC 12.33 would further ensure that the Project's potential impacts on parks would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As listed in Table 35 on page 329 and shown in Figure 16 on page 330 of this SCEA, there are five related projects located within 0.75 mile of the Project Site. As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. Similar to the Project, the related projects in the area would be required to pay park fees pursuant to Section 12.33 of the LAMC, as appropriate to the projects' location and proposed uses. The payment of fees would mitigate any potential impacts to park and recreational facilities. In addition, Related Project

[177] Pursuant to a letter issued to the Planning Department on April 9, 2020, RAP staff are recommending that a Condition of Approval be implemented for the Project requiring the payment of in-lieu fees in order to fulfill the Project's obligations under the provisions of LAMC 12.33. Compliance with this condition will require a payment of up to $3.2 million (442 market rate units X $7,251 per units) (before any available park credits for publicly accessible open space) and will therefore reduce any potential impacts to parks to a less than significant level.

No. 5 consists of a 17.2-acre park and a 80,249 square foot gymnasium, both of which would be available for use by the public at certain times, thereby adding to the available open space in the area. ***Therefore, overall, the cumulative impact associated with parks would be less than significant, and the Project's contributions to cumulative impacts would not be cumulatively considerable.***

e. Other Public Facilities?

Less Than Significant Impact. Based on information provided by the City of Los Angeles Public Library (LAPL) dated January 14, 2022, which is included in Appendix K of this SCEA, the Project Site is located within the service areas of two library facilities within a 2-mile radius, the distance that is generally considered to comprise the service area of a library.[178] These libraries include the Studio City Branch Library, located approximately 2 miles northeast of the Project Site at 12511 Moorpark Street in Studio City; and the Sherman Oaks–Martin Pollard Branch Library, located approximately 2 miles west of the Project Site at 14245 Moorpark Street in Sherman Oaks. The Studio City Branch Library is approximately 211,500 square feet in size, includes a collection of approximately 55,985 items, and has a staff of approximately 11.5 employees and seven volunteers. According to the LAPL, the service population of the Studio City Branch Library is approximately 39,838 persons. The Sherman Oaks–Martin Pollard Branch Library is approximately 11,500 square feet in size, includes a collection of approximately 54,929 items, and has a staff of approximately 11.5 employees and 28 volunteers. The service population of the Sherman Oaks–Martin Pollard Branch Library is approximately 69,036 persons.[179] At this time, there are no current plans to build new libraries that would serve the Project area.[180]

The LAPL Branch Facilities Plan, which was first adopted in 1988 and later revised in 2007 as Appendix VI of the Los Angeles Public Library Strategic Plan 2007–2010, includes criteria for new libraries and recommends size standards for the provision of LAPL facilities.[181] Under the Branch Facilities Plan, the service population for a branch library is determined by the size of the facility as set forth in Table 29 on page 270. Based on these criteria, the Studio City Branch Library and the Sherman Oaks–Martin Pollard Branch Library do not currently meet the building size recommendations set forth in the Branch Facilities Plan, but neither branch exceeds the 90,000 persons service population that would require that an additional branch be considered.

While the new residents generated by the Project would be anticipated to make use of the various libraries serving the Project Site, not all residents would use the library or travel to the same library. The *L.A. CEQA Thresholds Guide* also considers whether a project includes features that would reduce the demand for library services. The Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce

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178 As set forth in the L.A. CEQA Thresholds Guide, Section K.5, page K.5-2, the service area of a library is a 2-mile radius from the library.

179 Written correspondence from Los Angeles Public Library, Sportsmen's Lodge Mixed-Use Project, Request for Information, January 14, 2022. See Appendix K of this SCEA.

180 Written correspondence from Los Angeles Public Library, Sportsmen's Lodge Mixed-Use Project, Request for Information, January 14, 2022. See Appendix K of this SCEA

181 Los Angeles Public Library, Building on Success: Strategic Plan, 2007–2010, https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/K402.pdf, accessed April 15, 2022.

Table 29
LAPL Branch Facilities Plan—Library Building Size Standards

Library Type	Population Served	Size of Facility (sf)
Local Branch	< 45,000	12,500
Local Branch	> 45,000	14,500
Regional Branch	Unspecified	≤ 20,000
Central Library	System-Wide	Unspecified
Level at which new Branch Library is recommended	90,000	12,500–14,500

sf = square feet

Source: Los Angeles Public Library, Building on Success: Strategic Plan, 2007–2010.

demand at physical library locations.[182,183] The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. Nevertheless, the 1,240 new residents on the Project Site would increase the demand for library services as compared to existing conditions. In addition, the Project would generate approximately 128 new full-time and part-time positions that would typically be filled by persons already residing in the vicinity of their workplace, and who already generate a demand for the libraries in the vicinity of the Project Site. As such, any indirect or direct new demand for library services generated by employees of the proposed retail and restaurant uses would be negligible.

As noted above, under existing conditions, the two libraries that serve the Project Site do not currently meet the building size recommendations set forth in the Branch Facilities Plan. These facilities would continue to be undersized with the addition of the Project's residents. However, the recommended building size standards are not a threshold under CEQA or LAPL and there is no requirement to build new facilities or expand existing facilities when the recommended building size standards are not met. Additionally, LAPL does not make new building decisions based on any one project, but rather on the overall needs of the community.

The Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.)[184] that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. ***Therefore, the Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Project would be less than significant.***

182 Denise A. Troll, How and Why Libraries are Changing: What We Know and What We Need to Know, Carnegie Mellon University, 2002.

183 Carol Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.

184 City of Los Angeles, Budget for the Fiscal Year 2019–20.

Cumulative Impacts

Less Than Significant Impact. The residential population of a library's service area is the primary metric used by LAPL for assessing the adequacy of library services and planning for future growth (i.e., citing of new facilities). However, as noted above, the recommended building size standards are not a threshold under CEQA or LAPL and there is no requirement to build new facilities or expand when the recommended building size standards are not met and LAPL does not make new building decisions based on any one project, but rather on the overall needs of the community. Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, computers, and other library materials. Similar to the Project, the related projects in the area would be required to pay the required City fees. **Therefore, the cumulative impact associated with libraries would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.**

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM REC-1: In accordance provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.

b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:

i. Increasing the accessibility to natural areas for outdoor recreation
ii. Utilizing "green" development techniques
iii. Promoting water-efficient land use and development
iv. Encouraging multiple uses, such as the joint use of schools
v. Including trail systems and trail segments in General Plan recreation standards.

Applicability to the Project

Consistent with the measures outlined in PMM REC-1, the Project would comply with all regulatory compliance measures (payment of in-lieu fees) associated with maintaining parks and recreational facilities. In addition, the Project would increase accessibility to natural areas for outdoor recreation (e.g., the Los Angeles River Path). The Project would also utilize sustainable development techniques and promote water efficiency, and promote infill development. Thus, while the Project would be consistent with the relevant measures of PMM REC-1, adherence to regulatory requirements and implementation of elements of the Project would be equal to more effective than these measures, and no Project-specific impacts would occur. Thus, PMM REC-1 would not be incorporated into the Project.

Impact Analysis

a. Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. As discussed above under Item XV, Public Services, parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by RAP. Nearby parks and recreational facilities within an approximately two-mile radius of the Project Site include: Studio City Recreation Center (located 0.46 mile north of the Project Site); Wilacre Park (located 0.93 mile southeast of the Project Site); Moorpark Park (located 0.96 mile northwest of the Project Site); Coldwater Canyon Park (located 1.18 miles south of the Project Site); Valley Village Park (located 1.98 miles northeast of the Project Site); Van Nuys Sherman Oaks Tennis Courts (located 1.99 miles northwest of the Project Site); Van Nuys Sherman Oaks Pool (located 1.99 miles northwest of the Project Site); and Van Nuys Sherman Oaks Recreation Center (1.99 miles northwest of the Project Site).[185]

As previously discussed, while the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, the Project would comply with the City's requirements in LAMC Section 12.33 through the payment of park fees totaling $7,251 per residential unit (before any available credits for publicly accessible open space) In addition, the Project would comply with applicable open-space requirements with respect to the Project's residential component. Specifically, the Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 79,366 square feet, including approximately 52,520 square feet of exterior common open space, approximately 14,296 square feet of interior common space,

[185] City of Los Angeles Department of Recreation and Parks, Facility Map Locator, www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.1456553&geo[longitude]=-118.4119646&address=12825%20Ventura%20Blvd,%20Studio%20City,%20CA%2091604,%20USA, accessed June 4, 2021.

and 12,550 square feet of private open space. Approximately 21,039 square feet of the Project's open space would be accessible to the public.

Due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site, including publicly accessible open space, it is anticipated that Project residents and employees would often utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, as discussed under Item XV, pursuant to Section 12.33 of the LAMC, the Applicant would be required to park fees with regard to the residential component of the Project, which could total as much as $3.2 million (442 market rate units X $7,251 per unit, before any available credits for publicly accessible open space) which would be used to increase recreational opportunities for project residents and improve existing parks, both of which would reduce the Project resident's use of existing parks and recreational facilities and/or address any deterioration of those facilities. ***Thus, based on the above, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and impacts would be less than significant.***

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 79,366 square feet, including approximately 52,520 square feet of exterior common open space, approximately 14,296 square feet of interior common space, and approximately 12,550 square feet of private open space. Approximately 21.039 square feet of the Project's open space areas would be accessible to the public. The Project Site would include a series of landscaped pedestrian pathways and courtyards that would connect the Project Site and provide pedestrian access to the Los Angeles River Path. A large residential courtyard would be located toward the interior of the Project Site, adjacent to Building 1, that would feature outdoor dining seating, lounge seating, and landscaping. In addition, a landscaped pedestrian entry plaza would be located along Ventura Boulevard that would provide access to an open-air retail plaza. An outdoor public plaza would be located between Building 2 and Building 3, which would connect to a landscaped and terraced open space area providing public access to the Los Angeles River. The Project would also provide a public connection to the Los Angeles River via Coldwater Canyon Avenue. Additional open space would be provided on the roof (Level 7) of Building A, which would include a pool and deck, and on the roof (Level 3) of Building B, which would include an amenity deck overlooking the Los Angeles River. The Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site. Although the Project may place some additional demands on park facilities as new residents are introduced into the area, the increase in demand would be met through a combination of on-site amenities, existing parks in the Project vicinity, and payment of park fees, as discussed above. The Project's potential increased incremental demand upon recreational facilities would not in and of itself result in the construction of a new park, which might have an adverse physical effect on the environment. In addition, the recreational facilities included as part of the Project would not have a significant adverse effect of the environment, as discussed throughout this SCEA. ***Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facilities***

which might have an adverse physical effect on the environment and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The Project would not induce population growth beyond that included in the population projections for the City in SCAG's 2020–2045 RTP/SCS, and thereby would not, directly or indirectly, contribute to significant cumulative impacts to recreation. Similar to the Project, the related projects in the area would be required to pay a Dwelling Unit Construction Tax, Park Fees pursuant to LAMC Section 12.33, or other similar purpose fees, as appropriate to the projects' location and proposed uses. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. Furthermore, Related Project No. 5 consists of a 17.2-acre park and an 80,249-square foot gymnasium, both of which would be available for use by the public at certain times, thereby adding to the available open space in the area. ***Therefore, the Project's contribution to cumulative impacts associated with recreation would not be cumulatively considerable, and impacts would be less than significant.***

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☒	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference

(August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways:

- include TDM mitigation requirements for new developments;
- incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;
- provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;
- implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;
- develop TDM-specific performance measures to evaluate project-specific and system-wide performance;
- incorporate TDM performance measures in the decision-making process for identifying transportation investments;
- implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and
- set aside funding for TDM initiatives.
- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.

Applicability to the Project

Consistent with PMM TRA-1, the Project would incorporate TDM strategies, as outlined in Project Design Feature TR-PDF-1 and Project Mitigation Measure TR-MM-1. These TDM strategies, which include the provision of bicycle parking, pedestrian network improvements, voluntary travel behavior change, reduced parking, and unbundled parking, would specifically address the Project's VMT impacts, and would reduce impacts to less than significant levels. Thus, these Project-specific measures are more effective than PMM TR-1, and PMM TR-1 is not applicable to the Project.

PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering

standards prior to construction. Traffic control plans can and should include the following requirements:

- Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.
- Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
- Scheduling of truck trips outside of peak morning and evening commute hours.
- Limiting of lane closures during peak hours to the extent possible.
- Usage of haul routes minimizing truck traffic on local roadways to the extent possible.
- Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
- Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
- Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.
- Storage of construction materials only in designated areas.
- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
- Enhance emergency preparedness awareness among public agencies and with the public at large.

Applicability to the Project

The Project would be subject to the City's existing regulations that require the Project to comply with the Fire Code and LAMC emergency access requirements. In addition, the Project would include a Construction Traffic Management Plan, as outlined in Project Design Feature TR-PDF-2, which would ensure that adequate emergency access exists during construction. As existing regulatory requirements equal to or more effective than the PMM TR-1, it would not be incorporated into the Project.

Impact Analysis

The following analysis is primarily based on the Transportation Assessment that was prepared for the Project by Gibson Transportation Consulting, Inc. dated March 2022, which is included in Appendix L of this SCEA.

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. Pursuant to the LADOT 2020 Transportation Assessment Guidelines (TAG), projects should be analyzed to identify potential conflicts with programs, policies, plans, or ordinances that are adopted to protect the environment. Pursuant to the TAG, in general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT.[186] Each of the documents listed in the TAG (Table 2.1-1) was reviewed for applicability to the Project, and the relevant transportation-related policies are summarized below, along with the Project's conformance or non-conformance with each. In addition to the documents listed in the TAG, the Project's consistency with the Americans with Disability Act and the 2020–2045 RTP/SCS are also reviewed and summarized below.

Mobility Plan 2035

The Mobility Plan combines "complete street" principles with the following five goals that define the City's mobility priorities:

1. Safety First: Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.

2. World Class Infrastructure; A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.

3. Access for All Angelenos: A fair and equitable system much be accessible to all and must pay particularly close attention to the most vulnerable users.

4. Collaboration, Communication, and Informed Choices: The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.

5. Clean Environments and Healthy Communities: Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

The Mobility Plan further enumerates a variety of policies and programs in support of those goals. The policies and programs that are applicable to the Project are provided in the Transportation Assessment

[186] Los Angeles Department of Transportation, Transportation Assessment Guidelines, July 2020, https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27.pdf, accessed April 15, 2022.

included in Appendix L of this SCEA, along with a detailed discussion of the Project's consistency with each. A summary of the analysis from the Transportation Assessment is provided below.

The Mobility Plan identifies key corridors within the Project Study Area as components of various "mobility-enhanced networks." Though no new specific improvements have been identified and there is no schedule for implementation, the mobility-enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The Project would be designed with the mobility-enhanced networks as a top priority.

With the development of the Project, Coldwater Canyon Avenue and Ventura Boulevard along the Project frontage would be improved to provide adequate pedestrian safety, as well as add landscaping, crosswalks, and sidewalks that meet the designated widths and conform to the goals and long-term needs of the Mobility Plan with the exception of a section of Ventura Boulevard where the sidewalk on public property would be reduced to five feet wide to accommodate a 10-foot wide passenger pick-up/drop-off lane. Additional sidewalk width could be provided on-site to connect the passenger pick-up/drop-off lane to the Project and to provide a continuous 10-foot wide sidewalk.

Access to the Project would be provided via one full-access existing driveway on Coldwater Canyon Avenue that will be relocated to align with Valleyheart Drive and one full-access existing driveway on Ventura Boulevard that will be relocated to align with Goodland Avenue. A passenger loading area is proposed on Ventura Boulevard adjacent to the southern boundary of the site, which would eliminate a third existing driveway. Both driveways were analyzed for signal warrants and are proposed to be signalized by the Project. This provides the opportunity to provide additional crossing opportunities and improve safety at the conflict points between vehicles and pedestrians/bicyclists. Further, removing the third existing driveway would eliminate a conflict point between vehicles and pedestrians/bicyclists, making passage safer for all road users.

The Project would also provide a passenger loading zone along Ventura Boulevard within a "layby" configuration. The loading area would widen Ventura Boulevard by approximately 10 feet, leaving a five-foot sidewalk to accommodate the loading zone. As described above, additional sidewalk width could be provided on-site to connect the passenger pick-up/drop-off lane to the Project and to provide a continuous 10-foot wide sidewalk. The loading zone would reduce the potential for queuing issues related to passenger pick-ups/drop-offs and maintain the existing street right-of-way for other Mobility Plan enhancements such as bike lanes or transit improvements. Appropriate ADA access ramps would be provided for the loading zone.

The Project would provide sufficient off-street parking to satisfy vehicular parking requirements for the Project and to replace the existing parking spaces that would be removed.

The Project would also enhance pedestrian access along the Project frontage by providing improvements to the sidewalks and landscaping. In addition, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and will ensure driveways are constructed to provide maximum visibility between drivers, cyclists, and pedestrians. Secured bicycle parking facilities within the Project Site would also be provided. These measures would promote active transportation modes such as biking and walking, thereby reducing the Project VMT compared to the average for the area.

As detailed in Table 6 of the Transportation Assessment and summarized above, the Project is consistent with all applicable policies of the Mobility Plan and the Project does not interfere with other policies identified in the Mobility Plan. Therefore, the Project is consistent with Mobility Plan.

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues. The components of the Plan for a Healthy Los Angeles focus on health and wellness through increased quality of life, economic development, equity and environmental justice, housing and community stability, mobility, and open space.

A detailed analysis of the Project's consistency with the policies in the Plan for a Healthy Los Angeles is provided in Table 7 of the Transportation Assessment included in Appendix L of this SCEA. In summary, the Project would promote healthy living as a mixed-use development where active travel modes are encouraged. The Project prioritizes safety and access for all individuals utilizing the site by complying with all ADA requirements and providing direct connections to pedestrian and bicycle amenities. Further, the Project supports healthy lifestyles by locating jobs nearby transit (Metro bus lines with connections to the Metro B (previously Red) Line at the Universal City station), providing bicycle amenities, and enhancing the pedestrian environment by providing landscaping for a more comfortable environment for pedestrians. In addition, the inclusion of affordable housing units would provide attainable opportunities for social mobility and would not displace existing housing. The Project would also incorporate TDM measures, as outlined in Project Design Feature TR-PDF-1, that would reduce the number of single-occupancy vehicle trips to the Project Site, thereby lowering VMT and reducing GHG. Thus, based on the above and as detailed in Table 7 of the Transportation Assessment included in Appendix L of this SCEA, the Project is consistent with the policies included in the Plan for a Healthy Los Angeles.

Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

The Community Plan identifies one transportation-related objectives that specifically address the reduction of vehicular trips (Objective 1-2), and several objectives and policies that address various site and building design guidelines to be considered for multi-family developments. The Project aligns with each of these applicable goals and policies, as outlined under Item I, Aesthetics, and Item XI, Land use, above. Specifically with regard Objective 1-2, the Project would provide a mix of uses, including 520 housing units in an urbanized area and a designated HQTA, NMA, and Livable Corridor that is well-served by public transit, including Metro's NextGen Bus Line 240, which includes a consolidation of Bus Lines 240, 750, and a segment of 150; Metro Bus Line 167; and the LADOT Van Nuys-Studio City Loop Line. NextGen Bus Line 240 connects to the Metro B (Red) Line at the Universal City Station, with current service frequencies of 12 minutes during the morning and evening commute hours. Furthermore, the Project includes various TDM strategies pursuant to Project Design Feature TR-PDF-1, including the provision of bicycle parking and the incorporation of pedestrian network improvements that would provide pedestrian connections and linkages to increase walkability, that would further reduce the number of single-occupancy vehicle trips generated by the Project. Thus, based on the above and as outlined in Table 8 of the Transportation Assessment included in Appendix L of this SCEA, the Project would not conflict with applicable policies of the Community Plan addressing the circulation system.

Ventura-Cahuenga Boulevard Corridor Specific Plan

The Specific Plan strives to maintain an equilibrium between the transportation infrastructure and land use development. The Project contains a mix of uses, including residential, retail, and restaurant uses that would be located within an HQTA, NMA, and Livable Corridor with access to several transit options. In addition, the Project would promote a high level of pedestrian activity through the provision of pedestrian amenities and ground-floor commercial uses. The Project Site would be connected via a series of pedestrian pathways and plazas, with pedestrian access to Ventura Boulevard and to the Los Angeles River Path would be enhanced. Furthermore, consistent with the Specific Plan, the Project would incorporate TDM strategies, as outlined in Project Design Feature TR-PDF-1 and Mitigation Measures TR-MM-1, that would include bicycle parking, pedestrian network improvements, a voluntary travel behavior change program, reduced parking supply, and unbundled parking.[187] These strategies would reduce vehicle trips and VMT, thereby further maintaining an equilibrium between transportation and land use.

LAMC

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. As outlined in Table 16 of the Transportation Assessment, The Project's bicycle parking requirement is 264 spaces (224 long-term and 40 short-term).[188] The Project would provide 264 bicycle parking spaces for residential and commercial users (including 224 long-term and 40 short-term spaces) to satisfy the LAMC requirements for on-site bicycle parking supply. The Project would also include 49 long-term bicycle parking spaces that service The Shops Development that would be relocated to the Project Site, for a total of 313 bicycle parking spaces on the Project Site.

LAMC Section 12.26J, the TDM Ordinance (Ordinance No. 168,700, effective March 31, 1993) establishes trip reduction requirements for non-residential projects, in addition to non-residential components of mixed-use projects in excess of 25,000 square feet. Pursuant to Project Design Feature TR-PDF-1, The Project would incorporate TDM measures as part of the Project design. As outlined therein, these measures would include the provision of bicycle parking per the LAMC and the incorporation of on-site pedestrian network improvements. In addition, the Project would include TDM measures as mitigation, including a reduced parking supply of 13.5 percent, unbundled parking with a $100 surcharge to tenants that request a parking space, and a voluntary travel behavior change program to encourage use of alternative transportation modes consistent with the requirements set forth in the TDM Ordinance. Thus, the Project would not conflict with LAMC.

Vision Zero Action Plan/Vision Zero Corridor Plan

The primary goal of Vision Zero is to eliminate traffic deaths in the City of Los Angeles by 2025 through a number of strategies, including modifying the design of streets to increase safety. Vision Zero implements projects that are designed to increase safety for the most vulnerable road users. The City has identified

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[187] Voluntary travel behavior change programs are a TDM strategy that aims to educate participants on the impacts of their travel behaviors and opportunities to alter those behaviors by actively engaging participants through two-way mass communication campaigns and travel feedback programs.

[188] Bicycle parking requirements are based on the total proposed retail and restaurant floor area of 45,945 square feet minus 8,902 square feet of back-of-house uses, resulting in a total commercial floor area of 37,043 square feet.

numerous streets as part of the High Injury Network (HIN), which is a network of streets where strategic investments will have the biggest impact on reducing death and severe injury. The City has also created an Action Plan identifying the types of improvements that will be implemented.

The Project Site is located adjacent to Ventura Boulevard, a street identified on the HIN. As of April 2021, no Vision Zero improvements have been made within the Project Study Area. However, development of the Project would not make substantial changes to the public right-of-way or other physical improvements that would preclude the City from making any Vision Zero improvements. Thus, the Project would not conflict with Vision Zero.

Citywide Design Guidelines

The Citywide Design Guidelines identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. As previously discussed, the Design Guidelines are organized around three design approaches: Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design.

Per the TAG, the Pedestrian-First Design policies are applicable to this analysis. The Pedestrian-First Design approach focuses on design strategies that "create human scale spaces in response to how people actually engage with their surroundings, by prioritizing active street frontages, clear paths of pedestrian travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social interaction, creates equitable and accessible public spaces, and improves public safety by putting eyes and feet on the street." The Pedestrian-First Design guidelines are as follows:

> Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.
>
> Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
>
> Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

In summary, the Project would enhance the pedestrian experience through its design via the inclusion of pedestrian amenities; accessible sidewalks and walkways that provide pedestrian access throughout the Project Site, including to the Los Angeles River; and well-designed vehicular access driveways. Specifically, the Project would include extensive landscaping, including along the perimeter of the site, which would include street trees for shade, activating the streetscape and improve the pedestrian environment; gathering areas; seating; a large landscaped entry plaza; a terraced plaza providing improved access to the Los Angeles River Path; ground floor commercial uses; and pedestrian-scale lighting. Furthermore, the Project does not propose a new curb cutout or driveway along a designated Avenue or Boulevard as identified in the Mobility Plan. Thus, no new conflict point between pedestrians, bicyclists, and vehicles would be created. In addition, all driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. The Project would promote pedestrian-first accommodations through street landscaping, high visibility connections, and proximity to transit. Thus, based on the above and as outlined in Table 9 of the Transportation Assessment, included in Appendix L of this SCEA, the Project is consistent with the applicable policies of the Design Guidelines.

Americans with Disability Act

Overall, the Project design would comply with all ADA requirements, including the Standards for Accessible Design included as Appendix A of the title III regulation in the Code of Federal Regulations. As outlined in the Transportation Assessment included in Appendix L of this SCEA, the Project's vehicular and pedestrian entrances would be designed in accordance with all applicable ADA requirements. The Project would provide ADA access ramps for the loading area located along Ventura Boulevard. In addition, the Project frontage along Ventura Boulevard and Coldwater Canyon Avenue would be improved to provide upgraded sidewalks with adequate pedestrian safety in compliance with the ADA. New signalized pedestrian crossings at the Project access points would also be provided. All sidewalks and curb ramps along the Project frontage would be designed in compliance with ADA standards to achieve accessibility for all residents and patrons of the Project. Thus, the Project would be consistent with the applicable requirements of the ADA.

2020–2045 RTP/SCS

Objective 6 of the 2020–2045 RTP/SCS calls for a circulation system that is coordinated with land uses and densities and adequate to accommodate traffic, and for the expansion and improvement of public transportation service. The Project Site is located in an urbanized area and designated PGAs, including an HQTA, NMA, and Livable Corridor, that is well served by public transit provided by Metro and LADOT. The Project would include various streetscape improvements and street-level commercial uses that would activate the surrounding pedestrian environment and enhance walkability. Furthermore, the Project would bicycle parking per LAMC requirements. Thus, the Project would coordinate land use and circulation by promoting opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.

Cumulative Impacts

Less Than Significant Impact. The cumulative analysis takes into consideration the five related projects within 0.75 mile of the Project Site (listed in Table 35 on page 329 and shown in Figure 16 on page 330 in the analysis further below). Similar to the Project, the related projects would be individually responsible for complying with relevant plans, programs, ordinances, and policies addressing the circulation system. Thus, overall, implementation of the Project, together with the related projects, would not create inconsistencies with the Mobility Plan, Plan for a Healthy Los Angeles, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, Ventura-Cahuenga Boulevard Corridor Specific Plan, LAMC, Vision Zero, and the Citywide Design Guidelines. Thus, the Project and the Related Projects would not result in a cumulative impact that would preclude the City from serving the transportation needs as defined in its adopted programs, plans, ordinances, or policies. Each of the Related Projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. ***Therefore, the Project, together with the related projects, would not create inconsistencies with respect to the identified programs, plans, policies, and ordinances addressing the circulation system and cumulative impacts would be less than significant.***

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant With Mitigation Incorporated. SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that VMT is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its *Transportation Assessment Guidelines* (July 2019, updated July 2020), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The TAG identifies distinct thresholds regarding significant VMT impacts for the seven Area Planning Commission (APC) areas in the Los Angeles. The Project Site is located within the South Valley APC, for which the following thresholds have been established:

- Household VMT per Capita: 9.4
- Work VMT per Employee: 11.6

Per the VMT Calculator User Guide (May 2020), work VMT per employee is not reported for projects with local-serving commercial uses (i.e., commercial uses less than 50,000 square feet), and is thus, considered to be less than significant. As such, the Project's proposed commercial (retail and restaurant) space of up to 45,945 square feet would not result in a significant work VMT impact. Additionally, pursuant to Project Design Feature TR-PDF-1, the Project would incorporate TDM strategies to reduce the number of single-occupancy vehicle trips to the Project Site, including the provision of bicycle parking on-site per LAMC requirements and the incorporation of on-site pedestrian network improvements. The trip reductions from these TDM strategies are reflected in the VMT Calculator results. The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The land use inputs included 442 multi-family housing units, 78 affordable housing units, 18,019 square feet of high-turnover restaurant uses, and 27,926 square feet of retail uses. Based on the Project's land uses and location, assumptions were identified in the VMT Calculator, which are outlined in Table 10 of Transportation Assessment. Applying these assumptions and the TDM strategies outlined in Project Design Feature TR-PDF-1, the Project is estimated to generate 12,638 daily household VMTs, resulting in a daily household VMT per capita of 10.2. The average household VMT per capita would exceed the South Valley APC significance household impact threshold of 9.4 and, therefore, the Project would result in a significant VMT impact. Since the commercial component of the Project is less than 50,000 square feet, it is considered to be a small-scale and local-serving retail use under the TAG screening criteria. Accordingly, per the TAG, VMT impacts from this portion of the Project would be less than significant.[189]

[189] LADOT, Transportation Assessment Guidelines, July 2020, p. 19.

Project Design Features

The Project would implement the following Project Design Features:

TR-PDF-1: Pursuant to City of Los Angeles requirements, the Project shall incorporate the following TDM strategies:

- Bicycle Parking: In accordance with LAMC requirements, the Project will provide on-site long-term and short-term bicycle parking facilities to encourage the use of bicycling as an alternative to driving.
- Pedestrian Network Improvements: The Project's design shall include pedestrian paths that connect residential uses with internal and adjacent commercial uses and connect the Project's residential and commercial uses with the surrounding pedestrian network.

TR-PDF-2: Pursuant to City of Los Angeles requirements, prior to the start of construction, a Construction Traffic Management Plan shall be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- As parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by LADOT, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction;
- Temporary traffic controls during construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag persons);
- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking shall be prohibited on streets in the vicinity of the Project Site;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences;
- Coordinate with LADOT Parking Meter Division to address loss of metered parking spaces, as applicable.
- Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, as appropriate, including along all identified Los Angeles Unified School District (LAUSD) pedestrian routes to nearby schools;
- Schedule construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours, to the extent feasible, so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to nearby schools;
- Notify the LAUSD Transportation Branch and the site administrators of nearby LAUSD schools of the expected start and ending dates of construction. In

addition, the contractor or their designee shall coordinate with LAUSD site administrators and/or designated representatives to ensure that effective measures are employed to reduce construction-related effects related to existing pedestrian and school bus routes, and school drop off/pick up areas on proximate LAUSD facilities; and

- Identification of a construction manager and provision of a telephone number posted at the site during site preparation, grading, and construction readily visible to any interested party for any inquiries or complaints regarding construction activities.

Mitigation Measures

The Project would implement the following mitigation measure:

TR-MM-1: The Project shall incorporate additional TDM strategies as mitigation, as follows:

- Voluntary travel behavior change program with 100 percent of residents eligible
- Reduce parking supply by 13.5 percent
- Unbundle parking with a $100 monthly charge

With incorporation of Mitigation Measure TR-MM-1, the Project would generate 10,277 daily household VMT, resulting in an average VMT per capita of 8.3, which is below the South Valley APC significance threshold of 9.4.

Thus, based on the above, with implementation of Project Design Feature PDF-TR-1 and Mitigation Measure TR-MM-1, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and VMT impacts would be less than significant with mitigation.

Cumulative Impacts

Less Than Significant. Cumulative effects of development projects are determined based on the consistency with the air quality and GHG reduction goals of the RTP/SCS in terms of development location, density, and intensity. As detailed in the TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less than significant impact conclusion is sufficient in demonstrating there is no cumulative VMT impact, as those projects are already shown to align with the long-term VMT and GHG goals of the RTP/SCS. With incorporation of Project Design Feature TR-PDF-1 and Mitigation Measure TR-MM-1, the Project would not result in a significant VMT impact, as described above. Therefore, the Project is not anticipated to result in a cumulative VMT impact. Furthermore, the Project would also contribute to the productivity and use of the regional transportation system by providing employment and housing near transit and encouraging active transportation by providing new bicycle parking infrastructure and active street frontages, in line with RTP/SCS goals. Thus, the is consistent with the RTP/SCS goal of maximizing mobility and accessibility in the region. ***As such, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts associated with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.***

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Pursuant to the TAG (Threshold T-3) the determination of significance regarding the hazards due to a geometric design feature or incompatible uses should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design) while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions such as curves or grade changes, and the project's proximity to streets identified in the High Injury Network or the Safe Routes to School program.

Vehicular access to the Project Site would be provided via the following two driveways:

- Coldwater Canyon Avenue: The existing driveway on Coldwater Canyon Avenue would be modified to align with Valleyheart Drive to create a four-leg intersection. This driveway would be signalized and would provide access to the subterranean parking levels via a two -way ramp.

- Ventura Boulevard: The existing southern-most driveway on Ventura Boulevard would be modified to align with Goodland Avenue to create a four-leg intersection. This driveway would be signalized and would provide access to the subterranean parking levels via a two-way ramp.

In addition, a passenger loading area would be provided along Ventura Boulevard adjacent to the southern boundary of the Project Site, which would eliminate the third existing driveway. Ventura Boulevard would be widened by approximately ten feet to accommodate the loading area, leaving a five-foot sidewalk to accommodate the loading zone. The passenger loading area would allow for the existing street right-of-way to be maintained and would reduce the potential for queuing issues related to passenger pick-ups/drop-offs. Appropriate ADA access ramps would be provided for the loading zone.

Street parking would be prohibited adjacent to the Project Site near the driveways to allow for maximum visibility. There are no unusual or new obstacles included as part of the Project that would pose hazards to motorized vehicles, non-motorized vehicles, or pedestrian. The proposed driveways would be subjected to review by LADOT.

The Project Site consists of generally level topography and improved streets. There are no existing curves or grades adjacent to the Project Site that would result in sight distance obstacles causing vehicle, bicycle, or pedestrian conflicts. In addition, the Projects' driveways would be designed and placed to provide adequate sight distance, and no new or unusual obstacles are included as part of the Project that would pose hazards to motorized vehicles, non-motorized vehicles, or pedestrians.

Pedestrian and Bicycle Activity

Pedestrian and Bicycle access points would be provided along Ventura Boulevard and Coldwater Canyon Avenue. Ventura Boulevard is a designated Boulevard II in the Mobility Plan and is identified as part of the Pedestrian Enhanced District, Transit Enhanced Network, and Bicycle Lane Network. Coldwater Canyon Avenue is a designated Avenue II in the Mobility and is identified as part of the Pedestrian Enhanced District. The Project would result in an increase in both pedestrian and bicycle activity on

Ventura Boulevard and Coldwater Canyon Avenue, though not in sufficient quantities to result in a significant conflict with vehicles using the driveways. Based on traffic count data from December 2018 at the intersection of Coldwater Canyon Avenue and Ventura Boulevard, fewer than 60 pedestrians and bicyclists per peak hour, or approximately one per minute, traverse either driveway. Based on the trip generation estimates detailed in Table 5 of the Transportation Assessment included in Appendix L of this SCEA, the Project would generate fewer than four vehicles per minute at either of the Project driveways during either peak hour. In addition, with signalization of both Project driveways, pedestrians and cyclists would have a dedicated phase to cross the street. This reduces conflict between automobiles and other road users and will provide for longer gaps in traffic flow. Thus, pedestrians and bicyclists would have adequate gaps in vehicular traffic at the driveways to safely cross, and the Project is unlikely to result a substantial increase in vehicle-pedestrian or vehicle-bicycle conflicts. Furthermore, the Project driveways would be designed to remain clear of hardscapes, vegetation, or signage that would impede sight lines. Sidewalk treatments across the driveways would be incorporated for increased safety and visibility.

Safe Routes to School

The Project is not located within 0.25 mile of a school. The closest school to the Project Site is Dixie Canyon Community Charter, located 0.71 mile west. The Project would not directly affect access to any schools and would not impede any Safe Routes to School.

Freeway Safety

In May 2020, LADOT issued the City Freeway Guidance for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.

The City Freeway Guidance requires analysis of freeway off-ramps where a proposed development project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queueing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As identified in the Transportation Assessment, based on the Project's trip generation estimates and trip assignments, the Project would not add 25 or more peak hour trips to any freeway off-ramp. Therefore, no further freeway queuing analysis is required, and the Project would not result in a significant freeway safety impact.

Cumulative Impacts

Less Than Significant Impact. Of the five related projects within 0.75 mile of the Project Site, one (Related Project No. 4), located at 12833 Ventura Boulevard, is on the same block as the Project Site to the west. The Project proposes to construct two signalized driveways, one on Coldwater Canyon Avenue and one on Ventura Boulevard, which would be shared by Related Project No. 4 and the Project. These intersections were analyzed in the Transportation Assessment as Intersection No. 2 and Intersection No. 4. As the driveways would be shared between the two sites, potential vehicle conflicts with pedestrians and bicyclists would be greatly reduced. Additionally, the driveways would not cause any potentially significant hazards due to sightline issues or reduced pedestrian or cyclist visibility. Furthermore, by signalizing both shared driveways, traffic can be better managed along both corridors with designated

phases for pedestrian and cyclist crossings. Both signals are located well over 300 feet away from any existing intersections, thus minimizing any queuing concerns with nearby signals. ***Therefore, the Project would not result in cumulative impacts that would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts. Thus, Cumulative impacts would be less than significant.***

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The nearest disaster routes to the Project Site are Ventura Boulevard, which is adjacent to the southern boundary of the Project Site, the US-101, which is approximately 0.76 mile north of the Project Site, and Laurel Canyon Boulevard, which is approximately 0.92 mile east of the Project Site.[190] While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities, such as traffic control and flagging, may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard management plans required by LADOT that would be implemented to ensure adequate circulation and emergency access along the Project Site would be maintained. With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from Ventura Boulevard. In addition, the Project would comply with Los Angeles Fire Department (LAFD) access requirements and applicable LAFD regulations regarding safety. Furthermore, LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project would comply with these requirements of the Fire Code, as applicable. ***Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses, and impacts would be less than significant.***

Cumulative Impacts

Less Than Significant Impact. As analyzed above, the Project would not result in inadequate emergency access. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the study area and would not be concentrated to a specific location. Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. ***Therefore, Project impacts with respect to emergency access would not be cumulatively considerable, and cumulative impacts would be less than significant.***

[190] City of Los Angeles, GeoHub, https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore, accessed August 15, 2022.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;

b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;

c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.

Applicability to the Project

As discussed below, the Project would implement Mitigation Measure TCR-MM-1 to address the inadvertent discovery of tribal cultural resources, which has been determined to be equal or more effective than Mitigation Measure PMM TCR-1 from the 2020–2045 RTP/SCS. Thus, PMM TCR-1 is not incorporated into the Project.

Impact Analysis

The following analysis is primarily based on the Tribal Cultural Resources Assessment that was prepared for the Project by SWCA Environmental Consultants in July 2021, which is included as Appendix M of this SCEA.

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe

Less Than Significant With Mitigation Incorporated. As previously discussed, a TCR Report was prepared for the Project Site and is included as Appendix M of this SCEA. The TCR Report includes the results of a confidential record search of the CHRIS, a Sacred Land File (SLF) search, and archival research and a review of ethnographic literature conducted by SWCA. Consultation with California Native American tribes pursuant to Assembly Bill (AB) 52 is not required for projects that qualify for the preparation of a SCEA.[191] Nevertheless, communication with the Tribal contact associated with the SLF results was conducted, as discussed below.

As outlined in the TCR Report, a CHRIS records search was conducted through the SCCIC located at the California State University, Fullerton. The results of the record search indicate that a total of six cultural resource studies have been conducted within a 0.5-mile radius of the Project Site, two of which were within the boundaries of the Project Site. The CHRIS records search did not identify any known tribal cultural sites on the Project Site or in the Project vicinity.

In addition, a SLF search was conducted through the Native American Heritage Commission (NAHC). The NAHC is charged with identifying, cataloging, and protecting Native American cultural resources, which includes ancient places of special religious or social significance to Native Americans, and known ancient graves and cemeteries of Native Americans on private and public lands in California. The

[191] The Under Public Resources Code Section 21080.3.1, consultation with California Native American tribes must be initiated by the Lead Agency and concluded prior to the release of a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report for a project. As the Project does not require this level of environmental review, notification and government-to-government consultation pursuant to AB 52 and its implementing regulations are not required.

NAHC's inventory of these resources is known as the SLF. In addition, the NAHC maintains a list of tribal contacts affiliated with various geographic regions of California. The contents of the SLF are strictly confidential and SLF search requests return positive or negative results in addition to a list of tribal contacts with affiliation to the specified location. In a letter dated April 22, 2021, the NAHC's SLF search results indicated positive results and recommend contacting the Fernandeño–Tataviam Band of Mission Indian (FTBMI) for more information. SWCA attempted to reach the specified contact for the FTBMI through emails sent on July 15, 2021 and July 20, 2021, and no response was received. A copy of the NAHC letter and outreach emails are included in Attachment B of the TCR Report, included as Appendix M of this SCEA.

Archival research and a review of ethnographic literature were conducted to assess the likelihood for any potentially buried tribal cultural resources to be preserved on the Project Site. According to this research, as outlined in the TCR Report in Appendix M of this SCEA, the Project Site was first used for agricultural purposes by the middle of nineteenth century. Major changes became apparent in the 1950s with the establishment of the Sportsmen's Lodge. The construction of the Sportsmen's Lodge Hotel was completed in 1962, at which point the entire Project Site was fully paved and developed. A review of ethnographic literature and other archival sources indicate that the closest known Native American sites are the village site of Kaweenga, approximately 2.8 miles east of the Project Site, and the village site of Siutcanga, approximately 5.1 miles west of the Project, both of which were situated along the Los Angeles River. Native American archaeological sites have been identified as both of these locations. The Project Site's proximity to a major water course and location along a travel corridor situated between two known village sites indicates a generalized increase in the past use of the area by Native Americans, which correlates with an increase in the likelihood of material remains having been deposited through subsistence and ceremonial based practices. However, this generalized increase in sensitivity for buried tribal cultural resources is diminished by the impacts from historical developments across the Project Site, which would have dislocated or destroyed materials once present. As previously discussed, based on the results of geotechnical bores, the potential for tribal cultural resources is considered to be very low within the stratum designated as artificial fill, estimated to be between 2 and 4 feet below the current grade. However, below the artificial fill are various strata of naturally deposited Holocene-age alluvium, which can contain deeply buried archaeological deposits. The alluvium is between approximately 50 and 60 feet thick and any tribal cultural resources that might be present have the greatest chance of being preserved within the uppermost substrata of the alluvium. The deposition is consistent with general trends for the Los Angeles Basin and those specifically within the floodplain of the Los Angeles River. The sediment bores from the Project Site lack obvious indications of high-energy flooding, which suggests a relatively favorable preservation setting.[192] In addition, no evidence was identified that suggests that substantial deposits associated with a long-term occupation site or similar kinds of tribal cultural resources are likely to be located within the Project Site.[193] Rather, evidence suggests a generalized increase in the potential for smaller isolated deposits, including single artifacts or features, which is somewhat offset by the greater effect of historical disturbances in disturbing or dislocating any resources once present by virtue of their smaller size and more ephemeral nature. Thus, based on these findings, the sensitivity for tribal cultural resources at the Project site is considered low.

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[192] High-energy dispositional events (e.g., flooding) are less likely to have preserved any material remains left on the surface by Native Americans, while low-energy floods tend to produce more favorable environments for the preservation of cultural materials.

[193] Long-term occupation of a site typically produces more substantial deposits that are unlikely to be preserved below historic period disturbances to the near surface.

Overall, as outlined above, based on of available evidence (i.e., the CHRIS records search and the ethnographic and archival research findings) the potential for the Project Site to contain a previously unidentified tribal cultural resource that is archaeological in nature is low. However, due to the positive SLF result returned by the NAHC, two attempts to contact the FTBMI were made by SWCA through emails on July 10, 2021, and July 15, 2021, and no response has been received. Thus, potential impacts associated with the disturbance of any human remains, including those interred outside of dedicated cemeteries would be potentially significant. Construction activities on the Project Site would adhere to applicable regulatory compliance that apply to the inadvertent discovery of human remains. Specifically, Section 7050.5 of the California Health and Safety Code requires that, if human remains are discovered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition, pursuant to California Public Resources Code Section 5097.98. If the Coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains to be those of Native American, he or she shall consult with the NAHC within 24 hours to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.

Mitigation Measures

In order to further address the potential for the accidental discovery of a tribal cultural resource during construction of the proposed Project, including but not limited to the site or resource identified in the NAHC's SLF, and ensure that any potential impacts to a tribal cultural resource are avoided or reduced to less than significant levels, the City of Los Angeles's standard mitigation measure for the treatment of tribal cultural resources will be implemented, as follows:

TCR-MM-1: Prior to commencing any ground disturbance activities at the Project Site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s) shall be approved by the Fernandeño-Tataviam Band of Mission Indian (FTBMI). Any qualified archaeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources (OHR).

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the Project Site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archaeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources.

Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition,

workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and OHR.
2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.
8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254I, and handled in compliance with the City's AB 52 Confidentiality Protocols.

With incorporation of Mitigation Measure TCR-MM-1 to address the potential for the accidental discovery of a tribal cultural resource, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074. Thus, impacts would be less than significant with mitigation.

Cumulative Impacts

Less Than Significant Impact. As listed in Table 35 on page 329 and shown in Figure 16 on page 330 in the analysis further below, there are five related projects within 0.75 mile of the Project Site. Of these related projects, one (Related Project No. 4) is located within the same block as the Project Site to the west. The Project and the related projects are located within an urbanized area that has been disturbed and developed over time. Although impacts to tribal cultural resources tend to be site-specific, cumulative impacts would occur if the Project, related projects, and other future development within the Community Plan area affected the same tribal cultural resources and communities. All Project development would occur within the boundaries of the Project Site, and, as discussed above, there are no tribal cultural resources identified on the Project Site. However, in the event that tribal cultural resources are uncovered, the Project and each related project would be required to comply with the applicable regulatory requirements or implement project-specific mitigation measures to address the inadvertent discovery of tribal cultural resources would apply. In addition, related projects would be required to comply with the consultation requirements of AB 52, as applicable, to determine and mitigate any potential impacts to tribal cultural resources. **Therefore, cumulative impacts related to tribal cultural resources would be less than significant and would not be cumulatively considerable.**

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM USSW-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:

a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.

b) Inclusion of a waste management plan that promotes maximum C&D diversion.

c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed

materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).

d) Reuse of existing structure and shell in renovation projects.

e) Development of indoor recycling program and space.

f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.

g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.

h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.

i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.

j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.

k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.

l) Integrate reuse and recycling into residential industrial, institutional and commercial projects.

m) Provide education and publicity about reducing waste and available recycling services.

n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

Applicability to the Project

Consistent with SCAG Mitigation Measure PMM USSW-2, the Project would comply with existing regulatory requirements that are already incorporated in the Project, including adherence to applicable regulations of Title 24 of the California Building Code such as including, re-using and minimizing construction and demolition debris, diversion from local landfills, and utilizing on-site recycling. Additionally, there is adequate landfill capacity in the region to accommodate Project-generated waste, and no Project-specific impacts related to solid waste are necessary. Since the Project would not have the potential to generate solid waste in excess of State or local standards and incorporates regulatory

compliance measures that are consistent with applicable solid waste reduction measures under PMM USSW-2, this measure would not be incorporated into the Project.

PMM USWW-1: In accordance provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities

Applicability to the Project

Consistent with the above measure, and as discussed in the impact analysis below, the Project would ensure that there is sufficient wastewater infrastructure capacity to serve the Project. As no Project-specific impact would occur, PMM-USWW-1 would not be incorporated into the Project.

PMM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.

b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.

c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.

d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater on-site to tertiary standards and use it for non-potable uses on-site

Applicability to the Project

As described in the impact analysis below, available water resources are available to serve the Project, and no impacts regarding water supply are anticipated to occur. Furthermore, the Project would be required to comply with current water conservation measures required by Title 24 and the City's Green Building Code, and would also implement Project Design Feature WAT-PDF-1, which includes measures that are consistent with PMM USWS-1. As the applicable regulatory requirements and Project Design Features are equal to or more effective that PMM USWS-1, it is not incorporated into the Project.

Impact Analysis

The following analysis is primarily based on the Utilities Infrastructure Technical Report (Utility Report) that was prepared for the Project by KPFF Consulting Engineers dated May 2022, which is included in Appendix N of this SCEA.

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water

Construction

As discussed in the Utility Report included in Appendix N of this SCEA, Project construction activities would require water for a variety of activities, including but not limited to dust control, cleaning of equipment, excavation/export, removal and re-compaction. Based on a review of construction projects of similar size and duration, a conservative estimate of Project water use during construction ranges from 1,000 to 2,000 gallons per day (gpd). The estimated construction-period water demand will be less than the existing water consumption at the Project Site, and less than the estimated operational demand of the Project, which, as discussed below, can be accommodated by existing infrastructure. Thus, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project. As such, water needs during construction of the Project would not result in the construction of new or expanded water distribution facilities, and the existing off-site LADWP water infrastructure system would be adequate to provide for the water flow necessary to serve the Project during construction. Impacts on the water infrastructure due to construction activity would therefore be less than significant.

The Project would also require construction of new, on-site water distribution lines to serve the new buildings and facilities. Such improvements/activities would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connection to the public main, if required. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Furthermore, while trenching and installation activities could temporarily affect traffic flow and access on the adjacent streets and sidewalks, a Construction Traffic Management Plan would be implemented pursuant to Project Design Feature TR-PDF-2, as discussed under Item XVII,

Transportation, of this SCEA. This Construction Traffic Management Plan, which would be reviewed and approved by LADOT, would ensure the safe and efficient flow of vehicular and pedestrian traffic, and that emergency access to the Project Site and adjacent properties is maintained during the construction period. Overall, Project construction activities would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project construction-related water infrastructure impacts would be less than significant.

Operation

LADWP maintains water infrastructure to the Project Site. Water would be conveyed to the Project Site via water lines along Ventura Boulevard and Coldwater Canyon. Specifically, there are two 12-inch water lines in Ventura Boulevard between the eastern Project Site limits and the intersection to Coldwater Canyon Avenue. There is an existing lateral that ties into the site located in the southeast corner of the Project Site. There also appears to be an abandoned 8-inch water line along Ventura Boulevard. Additionally, there is a Los Angeles City 64-inch trunk water line that runs through Coldwater Canyon Avenue. An 8-inch and 30-inch water line run adjacent to the trunk line and continues up Coldwater Canyon Avenue. Furthermore, there is a network junction system at the intersection of Valleyheart Drive and Coldwater Canyon Avenue.

When analyzing the capacity of the water infrastructure system to serve a project, the estimated operational demands of the project for both fire suppression and domestic water are considered. Although domestic water demand would be the Project's main contributor to water demand in the long term, the Project's fire flow demands have a much greater instantaneous impact on infrastructure and therefore are the primary means for analyzing infrastructure capacity. Conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project. These analyses are described in detail in the Utility Report included in Appendix N of this SCEA.[194]

With regard to fire flow, based on fire flow standards set forth in LAMC Section 57.507.3, the Project falls within the High Density Residential and Neighborhood Commercial category, which has a required fire flow of 4,000 gpm from four fire hydrants flowing simultaneously with a residual water pressure of 20 psi. Based on the completed IFFAR (included as Exhibit 3 of Appendix N of this SCEA), each of the six existing hydrants near the Project Site can provide 1,500 gpm, which, with the six fire hydrants flowing simultaneously, can deliver a combined flow of 9,000 gpm. Thus, with each fire hydrant providing 1,500 gpm, four hydrants flowing simultaneously would provide a combined flow of 6,000 gpm. Therefore, based on the IFFAR, there is adequate fire flow and available to for the Project to comply with the requirements pursuant to LAMC Section 57.507.3.

In addition, the Project would incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands. Per LAMC Section 94.2020.0, which adopts by reference the National Fire Protection Association (NFPA) 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. The information from the SAR that was submitted to LADWP, which is included as Exhibit 2 of the Utility Report, indicates that domestic and fire

[194] KPFF Consulting Engineers, Sportsmen's Lodge Residential Phase Utility Infrastructure Technical Report: Water, Wastewater and Energy, May 2022, Exhibit 2 and 3. Refer to Appendix N of this SCEA.

water service off Ventura Boulevard has a static pressure of 136 psi and a flow of up to 2,500 gpm that can be delivered with a residual pressure of 131 psi. This confirms there is sufficient pressure to serve the Project.

Overall, based on the IFFAR and SAR, there is adequate fire flow available for the Project to comply with the requirements identified for the Project in accordance with LAMC Section 57.507.3 and LAMC Section 94.2020.0. Thus, fire flow impacts to LADWP's water infrastructure capacity would be less than significant.

Domestic water demand has been estimated based on City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN) sewage generation factors for applicable land use categories. The Project water consumption estimates are based on 100 percent of the LASAN sewage generation factors for the Project's various uses. As shown in Table 28 and discussed further below, the Project would generate a net increase in water demand of 67,331 gpd. The Project proposes to connect to the existing 12-inch water main in Ventura Boulevard. As demonstrated in the WSA for the Project, the existing public water distribution infrastructure on Ventura Boulevard has sufficient capacity to serve the Project.

Based on the above, the Project would not exceed the available capacity of existing water facilities, including the distribution infrastructure, that would serve the Project Site. Accordingly, the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project's operational impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the area served by the same water infrastructure as the Project). Development of the Project and the five related projects within 0.75 mile of the Project Site (listed in Table 35 on page 329 and shown in Figure 16 on page 330 in the analysis further below) would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the related projects would be subject to LADWP review (e.g., preparation of an IFFAR and SAR) to ensure that the existing water infrastructure is adequate to meet the domestic and fire demands. In addition, LADWP will continue to implement and update its Water Infrastructure Plan (WIP), with the current (2018–2019) WIP containing a five-year water system capital improvement plan that includes $6.3 billion for needed water system infrastructure improvements and maintenance.[195] Furthermore, in accordance with City requirements, prior to ground disturbance, the related projects would be required to coordinate with LADWP to identify the locations and depths of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects. Additionally, as with the Project, the related Projects would be required to implement a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the related project sites during construction activities. ***Therefore, cumulative water infrastructure impacts would be less than***

[195] LADWP, 2018–2019 Water Infrastructure Plan, https://ladwp-jtti.s3.us-west-2.amazonaws.com/wp-content/uploads/sites/3/2020/02/11170353/Water-Infrastructure-Report-Plan-2018-19_FINAL.pdf, accessed April 15, 2022.

significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

Wastewater

Construction

Construction activities for the Project could result in wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal and would be offset by the existing hotel uses to be removed. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas provided by the construction contractor, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

The Project would require construction of new on-site infrastructure to serve new buildings, and potential upgrades and/or relocations of existing wastewater infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for utility lines and connections to the public infrastructure and would be limited to the on-site wastewater distribution, and minor off-site work associated with connections to the public main (no upgrades to the public main are anticipated, as discussed below). Project contractors would coordinate with the City to identify the locations and depth of all lines prior to ground disturbance. Furthermore, the City would be notified in advance of proposed ground disturbance activities in order to avoid disruption of service. In addition, as set forth in Project Design Feature TR-PDF-2 included under Item XVII, Transportation, of this SCEA, a Construction Traffic Management Plan would be implemented during Project construction to ensure that adequate and safe pedestrian and vehicle access remains available within and near the Project Site during construction activities. The Construction Traffic Management Plan would identify the location of any temporary street parking or sidewalk closures, warning signs, and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Overall, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts to the wastewater conveyance or treatment system associated with construction of the Project would be less than significant

Operation

LASAN operates and maintains the wastewater treatment, reclamation, and collection facilities serving most of the City of Los Angeles incorporated areas, including the Project Site, as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance system for treatment at the Hyperion Treatment Plan (HTP) System. As outlined in the Utility Report prepared for the Project and included in Appendix N of this SCEA, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (mgd) (consisting of 450 mgd at the HTP, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles-Glendale Water Reclamation Plant) and the existing average daily flow for the system is approximately 300 mgd.

Wastewater infrastructure serving the Project Site includes an 8-inch vitrified clay pipe (VCP) sewer line from the intersection of Coldwater Canyon Avenue to the southeast corner of the Project Site. The VCP sewer line flows eastward and slopes at 0.4 percent. There are three existing manholes located along this section of the mainline, at the intersection of Ventura Boulevard and Coldwater Canyon Avenue (manhole ID: 44207137), 300 feet east of this intersection (manhole ID: 44207140), and the southeast corner of the Project Site (manhole ID: 44207142). The capacity of the 8-inch VCP sewer line is 0.76427 cubic feet per second (cfs) (493,960 gpd) entering the system between manhole ID numbers 44207140 and 44207142.

As shown in Table 30 below, based on sewage generation factors established by LASAN, the Project would generate approximately 187,799 gpd of wastewater, or approximately 0.19 million gallons per day (mgd), upon completion, with a net increase of approximately 77,803 gpd, or approximately 0.08 mgd. The Project's average daily wastewater flow of 0.19 mgd would represent substantially less than one percent of the available capacity of the Hyperion Service Area. A Wastewater Service Information (WWSI) response, included as Exhibit 4 of the Utility Report included in Appendix N of this SCEA, was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. The WWSI indicates that the Hyperion Water Reclamation Plant has sufficient capacity to serve the Project. In addition, based on the current approximate flow levels and design capacities the sewer system and the Project's estimated wastewater flow, LASAN determined that the sewer system might be able to accommodate the additional wastewater infrastructure demand created by the Project. Additional sewer capacity analysis has been performed by KPFF to determine if the existing infrastructure could accommodate the additional wastewater generated by the Project. Based on the City of Los Angeles Sewer Design Manual Part F, the trigger flow in a sanitary sewer is the quantity of flow that, once reached, would initiate the planning for a relief or replacement of the sewer. Currently, this trigger flow is considered when the depth of flow reaches three-fourths of the pipe diameter, or a d/D of 75 percent. As outlined in Table 5 of the Utilities Report included in Appendix N of this SCEA, the Project's additional sewer flow is not anticipated to exceed the trigger flow in any of the sewer lines analyzed in the WSSI. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Specifically, on-site building and site sewer design would follow the requirements of Chapter 7, Sanitary Drainage, of the 2019 California Plumbing Code. The off-site portion of the building sewer lateral would be constructed in accordance with the City of Los Angeles Bureau of Engineering Standard Plans and the City of Los Angeles Brown Book. The remainder of the public sewer system is designed in accordance with the City of Los Angeles Sewer Design Manual, Part F. Therefore, Project-generated wastewater would be accommodated by the existing water treatment system. Project operations-related wastewater infrastructure impacts would thus be less than significant.

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative impact analysis on the wastewater conveyance system is the area that includes the Project Site and the related projects and other nearby development projects that would potentially utilize the same infrastructure as the Project. Under the rules and regulations established in the City's Sewer Allocation Ordinance (Ordinance No. 166,060), LASAN assesses the anticipated wastewater flows from development projects at the time of connection and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. New development projects in the vicinity of the Project Site would be required to

submit a Sewer Capacity Availability Request (SCAR) or a SAR to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines to determine if there is adequate sewer capacity. In addition, new development projects would also be subject to LAMC Section 64.11 and Section 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with LASAN and comply with all applicable City and State water conservation programs and sewer allocation ordinances. ***Therefore, the cumulative impact related to the construction or expansion of wastewater infrastructure would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

Stormwater

Construction

As discussed under Item XIV, Hydrology and Water Quality, the Project's overall percentage of impervious area is expected to decrease compared to the current condition of the Project Site. In addition, BMPs would be implemented to control runoff. Therefore, there would be no incremental increase in runoff volumes during construction of the Project. Additionally, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on or off-site. As such, Project construction would not create runoff that would exceed the capacity of existing or planned drainage systems and no new or relocated stormwater facilities would be required during construction. Accordingly, impacts would be less than significant.

Operation

With regard to stormwater drainage, as discussed above in Checklist Section X, Hydrology and Water Quality, the Project's overall percentage of impervious area is expected to decrease compared to the current condition of the Project Site. In addition, BMPs would be implemented to control runoff. Specifically, the Project would manage stormwater through a capture and reuse and/or biofiltration system, which would capture stormwater runoff that would then be used for irrigation of the new landscaping around the Project Site. Therefore, there would be no incremental increase in runoff volumes.

As such, based on the above, construction and operation of the Project would not create runoff that would exceed the capacity of existing or planned drainage systems, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Stormwater from each of the five related projects and other nearby development projects would be collected on each of the respective sites, retained and treated in

compliance with Article 4.4 of Chapter VI of the LAMC, and directed towards existing storm drains. As a result of the requirements under Article 4.4 of Chapter VI of the LAMC, the amount of peak stormwater flows from new development would decrease as compared to older sites that were improved prior to the requirement to retain the first 0.75 inch of rainfall during storm events or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. ***Therefore, the cumulative impact related to the construction or expansion of stormwater infrastructure would be less than significant and the Project's contribution to cumulative stormwater impacts would not be cumulatively considerable.***

Electrical Power

Construction

The existing power service in the vicinity of the Project Site is supplied LADWP. Construction activities on the Project Site would require electrical power to convey water for dust control and for lighting, power tools and equipment, and construction trailers. Overall, demolition and construction activities would require minimal electrical consumption. As described below, LADWP's existing electrical infrastructure currently has enough capacity to provide service for the Project, and since the demand for electricity during construction would be minimal, there is also enough capacity to provide service for construction activities. The demand would be supplied from existing electrical services within the Project Site and would not affect other services. Thus, construction activities would not be expected to have any adverse impact on available electricity supplies.

The Project would require construction of new electrical mains to serve the new buildings and facilities. Construction impacts associated with electrical infrastructure upgrades would primarily be confined to trenching. Installation of electrical infrastructure would be limited to on-site electrical distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. Infrastructure improvements would comply with all applicable requirements and regulations set forth by LADWP, which would ensure that service disruptions and potential impacts are minimized. In addition, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access (see TR-PDF-2 under Item XVII, Transportation, of this SCEA). Therefore, construction of the Project would not result in significant impacts related to electrical power.

Operation

Operation of the Project would require electricity for the residential and commercial uses on site. As shown on Table 7 on page 8, the Project's operational electricity usage would be approximately 3,868,454 kWh per year, which is less than 0.02 percent of LADWP's projected sales in 2026–2027 fiscal year.[196] As discussed in the Utility Report, LADWP has confirmed that the there is sufficient capacity to serve the Project's electricity demand. The will-serve letter from LADWP is included as Exhibit 5 of the Utility Report included in Appendix N of this SCEA. Furthermore, the Project would implement any necessary new lines, connections, and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project. Therefore, operation of the Project would not result in significant impacts related to electrical power.

[196] LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

Overall, based on the above, construction and operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities and would not result in the construction of new electricity facilities or the relocation or expansion of existing facilities, the construction, relocation, or expansion of which could cause significant environmental effects. Thus, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The geographic context for a cumulative analysis regarding electricity is LADWP's service area. Implementation of the Project, in conjunction with the related projects, would cumulatively increase demand for electricity supplies and infrastructure capacity. The project would account for approximately 0.02 percent of LADWP's projected sales for the Project's build-out year. Although future development would result in the irreversible use of renewable and nonrenewable electricity resources during project construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for LADWP's service area. Furthermore, like the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Accordingly, the Project's contribution to cumulative impacts related to electricity consumption would not be cumulatively considerable and, thus, would be less than significant.

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2015 Power Integrated Resource Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. LADWP has indicated that the Power Integrated Resource Plan incorporates the estimated electricity requirement for the Project. The Power Integrated Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area***. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.***

Natural Gas

Construction

Construction activities, including the construction of the new buildings and associated facilities, typically do not involve the consumption of natural gas. Accordingly, no demand for natural gas would be generated by construction. However, the Project would require construction of new natural gas mains to serve the new buildings and associated facilities. Construction impacts associated with electrical infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of electrical infrastructure would be limited to on-site electrical

distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. Therefore, as part of the Project, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access (see Project Design Feature TR-PDF-2 under Item XVII, Transportation). Installation of any required natural gas infrastructure are of a relatively short-term duration (i.e., months), would be similar to the activities as analyzed in this SCEA, and would cease to occur once the installation is complete. Therefore, construction of the Project would not result in significant impacts related to natural gas.

Operation

As a public utility, the SoCal Gas is under jurisdiction of the California Public Utilities Commission (CPUC). Title 24 of the California Code of Regulations regulates energy consumption in new constructions. The standards regulate energy consumed in buildings for heating, cooling, ventilation and lighting. Title 24 is implemented through the local plan check and permit process. SoCal Gas' 2018 Gas Report states that residential gas demand is expected to decrease at an annual average rate of 1.4 percent whereas commercial and industrial demand is expected to increase at an annual rate of 0.2 percent. This is mainly due to increased efficiency of power plants and the statewide efforts to use renewable sources of energy for electricity generation.

As discussed in the Utility Report, the project will increase the demand for natural gas resources. As shown in Table 7 on page 80, the estimated projected net natural gas demand from the Project would be 6,253,082 cf per year. Based on the 2020 California Gas Report, the Project's natural gas consumption would account for approximately 0.0007 percent of the forecasted 2027 consumption in SoCal Gas's planning area. A will serve letter was sent to SoCal Gas to determine if there is sufficient capacity to serve the Project. As discussed in the Utility Report, LADWP has confirmed that the there is sufficient capacity to serve the Project's natural gas demand. The will serve letter from SoCal Gas is included as Exhibit 6 of the Utility Report included in Appendix N of this SCEA. Thus, operation of the Project would not result in significant impacts related to natural gas.

Overall, based on the above, construction and operation of the Project would not result in an increase in demand for natural gas that would exceed available supply or distribution infrastructure capabilities and would not result in the construction of new natural gas facilities or the relocation or expansion of existing facilities, the construction, relocation, or expansion of which could cause significant environmental effects. Impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative analysis of natural gas is SoCal Gas' service area. Buildout of the Project and related projects in SoCal Gas' service area is expected to increase natural gas consumption during project construction and operation and, thus, cumulatively increase the need for natural gas supplies and infrastructure capacity. As outlined in the Utility Report, based on the 2018 California Gas Report, the California Energy Commission estimates natural gas consumption within SoCal Gas' planning area will be approximately 3,775 million cubic feet/day in 2022. The Project's 6,256,082 cubic feet/year would account for approximately 0.45 percent of the 2022 forecasted consumption in SoCal Gas's planning area. SoCal Gas' forecasts consider projected

population growth and development based on local and regional plans. Although future development projects would result in the irreversible use of natural gas resources which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for SoCal Gas' service area. Furthermore, like the Project, during project construction and operation other future development projects would be expected to incorporate energy conservation, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary.

Natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCal Gas occur as needed. It is expected that SoCal Gas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. ***As such, cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and, thus, cumulative impacts would be less than significant.***

Telecommunications

Less Than Significant Impact. With regard to telecommunication facilities, the Project would require construction of new or extension of existing on-site telecommunications infrastructure to serve the proposed residential and commercial uses. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. ***Thus, impacts related to telecommunication facilities would be less than significant.***

Cumulative Impacts

Less Than Significant Impact. As listed in Table 35 on page 329 and shown in Figure 16 on page 330 in the analysis further below, there are five related projects within 0.75 mile of the Project Site. Telecommunications are regulated by the Federal Communications Commission (FCC) and the California Public Utilities Commission (CPUC). Each of the related projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs. ***Thus, the Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.***

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. LADWP provides water service to the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, the Metropolitan Water District of Southern

California (MWD), and recycled water. LADWP's 2020 Urban Water Management Plan provides water supply and demand projections in five-year increments to 2045, based on the demographic growth projections in SCAG's 2020–2045 RTP/SCS. The 2020 Urban Water Management Plan takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Based on LADWP's 2020 Urban Water Management Plan water demand projections through 2040, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2045, as well as the intervening years (i.e., the Project buildout year of 2027).[197]

Based on the proposed land uses and the Project's resulting estimated water demand, the Project is subject to the requirements of SB 610. A WSA was approved for the Sportsmen's Lodge Mixed-Use Project by the LADWP Board of Commissioners on April 12, 2022, and is included in Appendix N of this SCEA.[198] According to the WSA, and as shown in Table 30 on page 309, the projected total net water demand increase for the Project is estimated to be 59 acre-feet annually, equating to 52,310 gpd. The demand calculation considered water conservation ordinances for a savings of approximately 19 acre feet per year and additional voluntary conservation measures for a savings of 1 acre foot per year.[199] As stated in the WSA, the additional water demand of 59 acre feet per year has been accounted for in the City's overall total demand projections in LADWP's 2020 Urban Water Management Plan using a service area-wide approach that does not rely on individual development demand. Furthermore, as stated in the WSA, the Project is consistent with the demographic forecasts for the City from SCAG's 2020 RTP/SCS. Therefore, LADWP has determined that the Project water demand is included in the LADWP 2020 UWMP which forecasts adequate water supplies to meet all projected water demands in the City through the year 2045. As such, it is anticipated that sufficient water supplies will be available to serve the Project, and no new or expanded water entitlements will be needed. Impacts would be less than significant, and no mitigation measures are required.

Project Design Features

The Project would implement the following Project Design Feature related to water supply:[200]

WAT-PDF-1: In addition to regulatory requirements, the Project design shall incorporate the following water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances:

- Lavatory faucets in the residential amenity areas and commercial spaces with a maximum volume of 0.35 gallons per minute with self-closing design;
- High-Efficiency Toilets in the residential amenity areas and commercial spaces with a maximum flush volume of 1.1 gallons per flush;

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197 Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, June 2021, www.mwdh2o.com/planning-for-tomorrow/how-we-plan/, accessed April 11, 2022.

198 LADWP Water Resources Division, Water Supply Assessment for the Sportsmen's Lodge Mixed-Use Project, February 2022.

199 LADWP Water Resources Division, Water Supply Assessment for the Sportsmen's Lodge Mixed-Use Project, p. 7, February 2022.

200 The measures included in Project Design Feature WAT-PDF-1 are included voluntary water conservation measures in the Water Supply Assessment for the Sportsmen's Lodge Mixed-Use Project prepared by LADWP.

Table 30
Estimated Project Water Demand

	No. of Units/ Floor Area	Water Use Factor (gpd/unit)[a]	Water Consumption (gpd)
EXISTING TO BE REMOVED			
Hotel and Surface Parking[b]	135,584 sf		27,231
PROPOSED			
Residential			
Studio Apartment	171 du	75	12,825
One-Bedroom Apartment	140 du	110	15,400
Two-Bedroom Apartment	209 du	150	31,350
Residential Subtotal	520 du		*59,575*
Base Demand Adjustments (Residential)[c]			*7,131*
Required Ordinances Water Savings[d]			*(12,858)*
Total Residential			**53,848**
Commercial and Residential Amenities			
Commercial			
Retail	27,926 sf	0.03	698
Restaurant (seating area)[f]	601 seats	30.0	18,019
Restaurant (kitchen, storage, etc.)[f]	9,010	0.03	270
Subtotal Commercial			*18,987*
Residential Amenities			
Outdoor Kitchen[e]	40 sf	12.86	514
Gym/Health Club	14,869 sf	0.22	3,222
Conference Rooms	2,413 sf	0.06	145
Car Wash	300 sf	960.0	960
Leasing Office	600 sf	0.12	72
Subtotal Residential Amenities			*4,913*
Base Demand Adjustments (Commercial and Residential Amenities[c]			*14*
Required Ordinances Water Savings[d]	1		*(1,237)*
Total Commercial and Residential Amenities			**22,677**
Landscaping and Pool[g]	64,165 sf		6,370
Required Ordinances Water Savings[d]			*(3,019)*
Total Landscaping and Pool			**3,351**
Parking (Covered)[h]	559,021 sf	0.02	**368**
Cooling Tower[i]	0	0	**0**
Total Proposed			**80,244**
Existing to be Removed			**(27,231)**
Additional Voluntary Conservation Measures[j]			**(704)**

Table 30 (Continued)
Estimated Project Water Demand

	No. of Units/ Floor Area	Water Use Factor (gpd/unit)[a]	Water Consumption (gpd)
Net Water Consumption (Proposed – Existing – Voluntary Conservation Measures)			**52,310**

sf = square feet

du = dwelling unit

gpd = gallons per day

[a] *Based on sewage generation rates provided by LASAN Sewer Generation Rates Table (2012).*

[b] *The existing water demand is based on water meter reading for the existing Sportsmen's Lodge Hotel.*

[c] *Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of LASAN Sewer Generation Rates.*

[d] *The proposed land uses will conform to City of Los Angeles Ordinance No. 186488, 184248, 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code.*

[e] *The outdoor kitchen and BBQ area is for residential use only, with a total floor area of 600 square feet located in the rooftop pool area.*

[f] *For the restaurant space, half of the total area (18,019 square feet) is assumed for dining and the other half is kitchen/storage area.*

[g] *Landscape and pool water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7 Model Water Efficient Landscape Ordinance. This includes water features such as the splash pad, canyon arrival, and residential courtyard.*

[h] *Auto parking water uses are based on LASAN Sewer Generation Rates Table (2012) and 12 times per year cleaning assumption. Covered Parking includes 944 stalls (total parking area = 559,321 square feet; car wash = 300 square feet).*

[i] *The Project will not use a cooling tower, but instead will use DX split-system air conditioning units.*

[j] *Water conservation due to additional conservation commitments agreed to by the Project Applicant.*

Source: LADWP, Water Supply Assessment for the Sportsmen's Lodge Mixed-Use Project, February 2022.

- Urinals in the residential amenity areas and commercial spaces that are waterless or equivalent hybrid technology with periodic flushing;
- Kitchen faucets in the leasing office and outdoor kitchen with a maximum volume of 1.3 gallons per minute;
- Individual metering and billing for water use for commercial space;
- Drip/Subsurface Irrigation (Micro-Irrigation);
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together);
- Water features that can be turned off during drought and water use restrictions;
- Drought-Tolerant Plants

Based on the above, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, single-dry, and multiple-dry years. Therefore, the impacts on water supply would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative analysis of water supply is the LADWP service area. , LADWP, as a public water service provider, is required to prepare and periodically update its urban water management plan to plan and provide for water supplies to serve existing and projected demands. LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045. Implementation of the Project in combination with the related projects outlined in Table 35 on page 329 in the analysis further below, along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been taken into account in LADWP's 2020 UWMP. The 2020 UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2045 (the planning horizon required of 2020 UWMPs) under wet and dry year scenarios. It is unknown whether or not the related projects or other developments in the LADWP service area have been taken into account in the 2020 UWMP. Nonetheless, it can be assumed that any development projects that are not included in the 2020 UWMP would be required to identify water supplies prior to project approval. In addition, larger projects with over 500 residential units would have to prepare a WSA pursuant to SB 610 to be reviewed and certified by LADWP to demonstrate adequate water supply. **Therefore, cumulative impacts on water supply would be less than significant.**

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact.

Construction Impacts

Construction activities for the Project would result in wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal when compared with the Project Site wastewater generation under existing conditions. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows and impacts would be less than significant.

Operational Impacts

The Los Angeles sewer system is comprised of three systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System. The Project Site lies within the Hyperion Sanitary Sewer System. The Project Site is within the Hyperion Service Area served by the Hyperion Sanitary Sewer System. LASAN is responsible for the operation of wastewater treatment facilities in the City.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant (HTP). The HTP has a capacity of approximately 550 mgd (consisting of 450 mgd at the Hyperion Water Reclamation Plant (HWRP), 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant). The current average daily wastewater flow for the system is approximately 300 mgd. Accordingly, the remaining available capacity at the HTP is approximately 250 mgd.

As analyzed in the Utility Report and shown in Table 31 on page 313, the existing uses on the Project Site, which consist of a hotel, associated uses, and a surface parking area, generate approximately 109,996 gpd of wastewater. As shown in Table 32 on page 314, the Projects estimated wastewater generation is approximately 187,799 gpd, or 0.188 mgd. When accounting for existing uses to be removed, the next increase in sewer demand for the Project Site is 77,803 gpd (0.078 mgd). This is equal to less than one percent of the Hyperion Service Area capacity where the Project's wastewater would be treated. As such, the HTP has the capacity to treat the additional wastewater flows generated from the Project. This determination was confirmed in the WWSI response. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment within the Hyperion Service Area. Therefore, the Project would not result in a determination by the wastewater treatment provider that serves the Project Site that it does not have adequate capacity to serve the Project.

As discussed above, a WWSI response, which is included in the Utility Report (see Exhibit 4 of Appendix N of this SCEA), was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. The existing sewer gauging information from LASAN is summarized in Table 5 of the Utilities Report included in Appendix N of this SCEA. Based on the current approximate flow levels and design capacities in the sewer system and the Project's estimated wastewater flow, the City determined that the existing capacity of the sewer system may be able to accommodate the additional wastewater infrastructure demand created by the Project. As previously discussed, KPFF conducted additional sewer capacity analysis to determine the impact of adding the Project's anticipated sewage generation, as summarized in Table 5 of the Utilities Report. As determined therein, the Project's additional sewer flow is not expected to exceed the trigger flow, thereby initiating the planning for a relief or replacement sewer. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Thus, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service Area. Implementation of the Project in combination with the five related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. The HTP has a capacity of approximately 550 mgd,

Table 31
Estimated Existing Wastewater Generation

Building Use	Sewage Generation Factor[a]	Unit	Quantity	Total Generation (gpd)
Hotel	120	room	190	22,800
Swimming Pool[b]	—	cf	1	87,196
Existing Total Wastewater Generation				**109,996**

gpd = gallons per day

cf = cubic feet

[a] *Based on LASAN Sewage Generation Factor Table, Exhibit 9 (2012).*

[b] *Based on area (1,793.42 square feet) and depth (6.5 feet) of pool. Volume = 11,654.5 cf or 87, 196 gallons. Pool is assumed to be emptied in one day.*

Source: KPFF Consulting Engineers, Sportsmen's Lodge Residential Phase, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, May 2022.

and currently, the remaining available capacity at the HTP is approximately 250 mgd. The Project, which would generate much more wastewater than the related projects due to its size and land uses, would increase sewer demand by less than one percent of the Hyperion Service Area capacity. Thus, it can be assumed that the related projects would generate even less sewer demand. Furthermore, the related projects would have to demonstrate that the existing capacity of the sewer system would be able to accommodate the additional wastewater infrastructure demand created by the project. In addition, pursuant to LAMC Section 64.14, related projects would be required to obtain final approval of sewer capacity and connection permits during the Project's permitting process. ***Therefore, the HTP would have adequate capacity to serve the additional wastewater demand by the Project and future development projects within the HTP service area and no significant cumulative impacts would occur.***

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. While LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.[201] Nine Class III landfills and one inert waste landfill with solid waste facility permits are

[201] Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

Table 32
Estimated Proposed Wastewater Generation

Building Use	Sewage Generation Factor (gpd/unit)[a]	Quantity	Total Generation (gpd)
Residential: Studio	75 du	171	12,825
Residential: Apartment—1 bedroom	110 du	140	15,400
Residential: Apartment—2 bedroom	150 du	209	31,350
Retail (less than 100,000 sf)	25 ksf	27,926	698
Restaurant: Full Service[b]	30 seats	901	27,029
Health Club/Gym	650 ksf	14,869	9,665
Post Office: Full Service	120 ksf	1,868	224
Conference Rooms[c]	120 ksf	2,413	290
Swimming Pool (Commercial with backwash filters)[d]	1 cf	11,746	87,856
Irrigation[e]	—	898,835	2,463
Total Estimated Proposed Wastewater Generation			**187,799**
Existing Total Wastewater Generation			**109,996**
Net Increase in Wastewater Generation			**77,803**

du = dwelling units

gpd = gallons per day

ksf = thousand square feet

[a] *Based on LASAN Sewage Generation Factor Table, Exhibit 9 (2012).*

[b] *Assumes 1 seat per 20 square feet.*

[c] *Conference room uses use general Office Building factor.*

[d] *Based on area (1,807 sf) and depth (6.5 feet) of pool. Volume = 11,745 cf or 87,856 gallons. Swimming pool is assumed to be drained in one day.*

[e] *Irrigation water usage was estimated using the State of California's Department of Water Resources "Water Budget Calculator"*

Source: KPFF Consulting Engineers, Sportsmen's Lodge Residential Phase, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, May 2022.

currently serving the County of Los Angeles.[202] In addition, there is one solid waste transformation facility within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

[202] County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020. The 9 Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

Based on the 2019 Countywide Integrated Waste Management Plan Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 148.40 million tons. The permitted inert waste landfill serving the County is the Azusa Land Reclamation facility. This facility has 58.84 million tons of remaining capacity and an average daily in-County disposal rate of 662 tons per day.[203] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Countywide Integrated Waste Management Plan Annual Report Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[204]

The 2019 Countywide Integrated Waste Management Plan Annual Report Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with existing capacity under six of the seven scenarios. The 2019 Countywide Integrated Waste Management Plan Annual Report Annual Report concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.[205] The City of Los Angeles is currently diverting 76.4 percent of its waste from landfills.[206] The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

The following analysis quantifies the Project's construction and operation solid waste generation.

Construction

The Project Site is currently improved with the 135,584 square foot Sportsmen's Lodge Hotel as well as existing surface parking. To provide for the proposed improvements, the Project would replace the existing uses with 520 residential units (consisting of 540,900 square feet), 18,019 square feet of restaurant uses, 27,926 square feet of retail uses, and 64,151 square feet of residential amenity and accessory space. Upon completion, the Project would result in up to 650,996 square feet of floor area within the Project Site. As shown in Table 33 on page 316, based on construction and debris rates established by the USEPA, it is anticipated that construction of the Project would generate approximately 10,508 tons of demolition waste associated with the removal of existing uses, and 1,414 tons of construction waste, resulting in a total of 11,922 tons of waste prior to recycling.

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[203] County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed April 15, 2022.

[204] County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

[205] LA Sanitation, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed February 9, 2021.

[206] LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=18850686489149411#!, accessed February 9, 2021.

Table 33
Project Construction Waste Generation

Building	Size	Generation Rate (lbs/sf)[a,b]	Total (tons)[b]
Demolition Waste			
Sportsmen's Lodge Hotel	135,584 sf	155	10,508
Construction Waste			
Residential (520 du)	540,900 sf	4.38	1,185
Restaurant	18,019 sf	3.89	35
Retail	27,926 sf	3.89	54
Residential Amenity/Accessory Space	64,151 sf	4.38	140
Construction Waste Subtotal			*1,414*
Total Demolition and Construction Waste			*11,922*
Total After 75-Percent Recycling			**2,980**

du = dwelling units

lbs/sf = pounds per square feet

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4, Table 5, and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.*

[b] *Used conversion of 1 ton = 2,000 pounds. Numbers have been rounded and may not add up exactly.*

Source: Eyestone Environmental, 2021.

Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

As shown in Table 33, after accounting for mandatory recycling, the Project would result in approximately 2,980 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation Landfill) throughout the construction period. This amount of construction and debris waste would represent approximately 0.005 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 58.84 million tons. Thus, the total amount of construction and demolition waste generated by the Project would represent a small fraction of the remaining capacity at this permitted inert landfill serving Los Angeles County. Given the remaining permitted capacity at the Azusa Land Reclamation facility as well as the remaining 148.40 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Operation

As shown in Table 34 on page 318, upon full buildout, the Project would result in a net increase in solid waste generation of 1,635 tons per year, when accounting for the removal of existing uses. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the Year 2025.[207] After applying the 50 percent diversion/recycling rate, the Project would result in a next increase in solid waste generation of 818. The estimated annual net increase in solid waste that would be generated by the Project (prior to recycling/diversion) of 1,635 tons represents approximately 0.001 percent of the remaining capacity (148.40 million tons) for the County's Class III landfills open to the City of Los Angeles.[208] The estimated annual net increase in solid waste that would be generated by the Project (after accounting for 50 percent recycling/diversion) of 818 tons represents approximately 0.0006 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.[209]

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. As previously discussed, the County Integrated Waste Management Plan Annual Reports are prepared to address landfill capacity and provide sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning Directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2019 Annual Report. The Project would be consistent with and would further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2019 Annual Report to adequately meet countywide disposal needs through 2034 without capacity shortages.

Overall, based on the above, construction and operation of the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Thus, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative impact analysis for solid waste is the entire County of Los Angeles because the landfills open to the City of Los Angeles generally

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[207] City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed February 9, 2021.

[208] 1,635 tons per year/148.40 million tons x 100 = 0.001 percent

[209] 818 tons per year/148.40 million tons x 100 = 0.0006 percent

Table 34
Estimated Project Solid Waste Generation

Land Use	Size	Employee Generation Rate[a]	Estimated No. of Employees	Solid Waste Generation Rate[b,c,d]	Total Generation (tons/year)
Existing to Be Removed					
Sportsmen's Lodge Hotel	190 rooms	0.5[d]	95	3.03	288
Total Existing to Be Removed					288
Proposed					
Residential	520 du	N/A	N/A	2.23 tn/du/yr	1,160
Retail	27,926 sf	2/1,000 sf	56	2.98 tn/emp/yr	167
Restaurant	18,019 sf	4/1,000 sf	72	2.98 tn/emp/yr	215
Residential Amenity/Accessory Space[e]	64,151 sf	2/1,000 sf	128	2.98 tn/emp/yr	381
Total with Implementation of Project					1,923
Total Net Increase (prior to diversion)					1,635
Total Net Disposal (after 50% diversion/recycling)					818

du = dwelling units

emp = employees

tn = tons

yr = year

Hotel rate includes restaurants and other associated facilities.

[a] *Employee Generation Rates from Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Table 1, May 2020. Based on the employee generation rate of 2 employees per 1,000 square foot for "General Retail" and employee generation rate of 4 employees per 1,000 square foot for "Quality Restaurant*

[b] *Residential solid waste generation factor based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year), pursuant to the L.A. CEQA Thresholds Guide.*

[c] *Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 2.98 ton per employee per year (Retail—Restaurants) for restaurant use.*

[d] *According to the VMT Calculator Documentation, the generation rate for hotel uses includes associated restaurants and facilities.*

[e] *For purposes of this analysis, amenity/accessory space conservatively used the employee generation and solid waste generation rate for retail uses*

Source: Eyestone Environmental, 2021.

serve the entire County. The Project and the related projects in conjunction with growth forecasted in the County through 2027 (i.e., the Project buildout year), would cumulatively generate solid waste, thus potentially resulting in cumulative impacts on solid waste facilities. Construction of the Project and other development projects generate construction and demolition waste, resulting in a cumulative increase in the demand for inert (unclassified) landfill capacity. Given the requirements of the Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed

construction and demolition waste generated within City limits be taken to a City-certified construction and demolition waste processor, it is anticipated that future cumulative development within the City would also implement similar measures to divert construction and demolition waste from landfills. As discussed above, the Azusa Land Reclamation Landfill has an remaining disposal capacity of 58.84 million tons. Thus, this landfill would be expected to have sufficient capacity to accommodate cumulative construction demand.

Operation of the Project in conjunction with the related projects would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The countywide demand for landfill capacity is continually evaluated by Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. As such, the 2019 Annual Report (published in September 2020) projects waste generation and available landfill capacity through 2034.[210] According to the 2019 Annual Report, the forecasted waste generation within the County in 2027 (i.e., the anticipated Project buildout year) would be approximately 32,542,203 tons.[211] Based on a 65-percent diversion rate, as assumed in the 2019 Annual Report, an estimated 11,389,771 tons of solid waste would be disposed of at Class III landfills and transformation facilities in 2027.[212] Based on the seven scenarios evaluated in the 2019 Annual Report, only Scenario I, Utilization of Permitted In-County Disposal Capacity Only, would result in a shortfall during the Project's buildout year. The remaining six scenarios, including Scenario II, Status Quo, demonstrate adequate disposal capacity. Furthermore, the Project's estimated annual solid waste disposal of 1,635 tons prior to diversion/recycling and 818 tons after diversion/recycling) during operation would represent a small percentage (approximately 0.005 percent and approximately 0.002, respectively) of the forecasted County waste generation of 32,542,203 tons in 2027.

As discussed above, adequate disposal capacity would be available under six of the seven scenarios studied in the 2019 Annual Report, one of which reflects the status quo or existing conditions. Individual jurisdictions will continue to pursue the strategies set forth in the 2019 Annual Report and future annual reports in order to maintain adequate disposal capacity. **As such, the Project's contribution during operation would not be cumulatively considerable, and cumulative impacts with regard to solid waste disposal capacity from operations would be less than significant.**

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991,

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[210] County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

[211] County of Los Angeles, Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2, Table 7.

[212] County of Los Angeles, Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2, Table 8.

which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 4 cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[213] on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[214] The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Additionally, the Project's construction contractor would deliver all construction and demolition waste generated by the Project to a Certified Construction and Demolition Waste Processing Facility in accordance with City Ordinance No. 181,519. Furthermore, the Project would implement a construction waste management plan to divert a minimum of 75 percent waste from landfills, thus exceeding state requirements. As such, the Project would promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAn/L.A.'s Green New Deal.

Overall, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Thus, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Like the Project, the related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the City's Green Building Code, as applicable. Specifically, the Project and related projects would be required to promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAn/L.A.'s Green New Deal. ***Therefore,***

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213 Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

214 Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

construction and operation of the Project and the related projects would comply with applicable state or City solid waste regulations and would not result in significant cumulative impacts. As such, the Project's contribution during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.

b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.

c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.

d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.

e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.

f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place

g) Include external sprinklers with an independent water source to reduce flammability of structures.

h) Include local solar power paired with batteries to reduce power flow in electricity lines.

i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses.

j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas.

k) Developments in fire-prone areas should have fire-resistant feature, such as:

- Ember-resistant vents
- Fire-resistant roofs
- Surrounding defensible space
- Proper maintenance and upkeep of structures and surrounding area

Applicability to the Project

As described in the impact analysis below, the Project Site is located in an area classified as a VHFHSZ. Compliance with LAMC Section 91.7207 and LAMC Section 57.322 (2020 Los Angeles Fire Code), which outline specific requirements for properties within the Very High Fire Hazard Severity Zone, along with other applicable City requirements, would be equal to or more effective than PMM WF-1, as the Project would be required to incorporate site-specific recommendations for increasing safety and reducing fire hazards. As such, the Project would not result in potential impacts pertaining to wildfire hazards, and the measure included in MM-HAZ-8(b) are not applicable to the Project.

PMM WF-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to:

- Submit a fire protection plan including the designation of fire watch staff;
- Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;
- Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and

– Designate trained fire watch staff during project construction to reduce risk of fire hazards.

Applicability to the Project

As previously discussed, the Project Site is located in an area classified as a Very High Fire Hazard Severity Zone. Compliance with LAMC Section 91.7207 and LAMC Section 57.322, which outline specific requirements for properties within the Very High Fire Hazard Severity Zone, along with other applicable City requirements, would be equal to or more effective than PMM WF-2. Thus, PMM WF-2 are not applicable to the Project.

Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. As discussed above, The Project Site is located within Very High Fire Hazard Severity Zone, as established by LAMC Section 57.4908. The nearest disaster routes to the Project Site are Ventura Boulevard, which is adjacent to the southern boundary of the Project Site, US-101, which is approximately 0.76 mile north of the Project Site, and Laurel Canyon Boulevard, which is approximately 0.92 mile east of the Project Site.[215,216] Construction activities for the Project would primarily be confined to the Project Site. In addition, pursuant to Project Design Feature TR-PDF-2, a Construction Traffic Management Plan would be implemented to ensure that adequate emergency access is maintained in the vicinity of the Project. With regard to operation, the Project does not propose the permanent closure of any local public streets. Furthermore, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. ***Therefore, the Project would not impede emergency access within the Project Site vicinity or cause an impediment along the City's designated disaster routes such that it would impair the implementation of the City's emergency response plan, and impacts would be less than significant.***

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. The Project Site is located in an established urban area in the Studio City area of the City of Los Angeles that has been developed with a variety of urban uses. The Project Site is generally flat, with a gentle north slope that would not exacerbate wildfire risks.

The Project Site is located within a VHFHSZ, as designated by the LAFD and the California Department of Forestry and Fire Protection (CAL FIRE). The Project Site is located along the northern boundary of the VHFHSZ in area developed with urban uses. Nevertheless, all projects located within a VHFHSZ must comply with specific fire protection features, including LAMC Section 91.7207 and LAMC Section

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215 City of Los Angeles, GeoHub, https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore, accessed August 15, 2022.

216 County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Valley Area, September 2012, http://dpw.lacounty.gov/dsg/disasterroutes/map/Los%20Angeles%20Valley%20Area.pdf, accessed April 15, 2022.

57.4908. The Project would also comply all other applicable fire safety requirements, including brush clearance regulations, provisions in Chapter 7A of the California Building Code, and the 2020 City of Los Angeles Fire Code.

In accordance with the provisions of LAMC Section 91.7207 (*Special Requirements for the VHFHSZ*), the Project would comply with the following:

- Residential buildings shall have all under-floor areas completely enclosed to the ground with construction as required for exterior walls, with the following exceptions:
  - Complete enclosure shall not be required where the underside of all exposed floors and all exposed structural columns, beams and supporting walls are protected as required for exterior one-hour fire-resistive construction.
  - The area under cantilevered balconies and unroofed walking decks need not be considered as under-floor area, provided exposed utilities, pipes or other mechanical devices are not located in the area.
- All utilities, pipes, furnaces, water heaters or other mechanical devices located in an exposed under-floor area of a residential building shall be enclosed with material as required for one-hour fire-resistive construction. Adequate covered access openings for servicing such utilities shall be provided as required by appropriate codes.
- All exterior attic openings shall be protected with a maximum 1/4-inch noncombustible and corrosion-resistant screen.
- All buildings shall have a fire retardant roofing assembly complying with the requirements of Class A roof covering as defined in California Building Code Section 1505. Wood shakes and shingle are not permitted in the Very High Fire Hazard Severity Zone.

In addition, in accordance with the provisions of LAMC Section 57.4908 (*VHFHSZ Requirements Specific to Los Angeles*), the Project would comply with the following:

- There shall be no open flame or self-contained device capable of producing flame permitted or located upon any road, street or fire road within the Very High Fire Hazard Severity Zone.
- It shall be unlawful for any person to light, ignite or smoke any cigar, cigarette, tobacco in a pipe or other form of smoldering substance within the Very High Fire Hazard Severity Zone.
- Any person owning, leasing, controlling, operating or maintaining any electrical transmission line over any mountainous forest, brush, or hazardous vegetation covered land shall at all times cut, trim, or otherwise remove all forked, dead, decadent, rotten, diseased, or weakened branches of trees, or trees that may contact or fall upon any transmission line. Live trees shall remain pruned and trimmed to prevent exposure to electrical transmission or branch lines.

The Project would also adhere to the City of Los Angeles' brush clearing regulations, which require year-round maintenance of all native brush, weeds, grass, trees, and hazardous vegetation (per LAMC Section 57.322) within 200 feet of any structure/buildings, whether those structures are on the owner's property or adjoining properties, and within 10 feet of any combustible fence or roadway/driveway used for vehicular travel (LAFD Brush Clearance Requirements, revised 2017). Additional brush clearing requirements that

are specifically intended for properties within a VHFHSZ, as outlined in LAMC Section 57.322, would also be implemented, including the following:

- All individuals performing grass or brush clearance activities in the VHFHSZ shall adhere to the following specific requirements;
- Grass or brush clearance operations shall not be conducted on red flag days;
- Individuals engaged in grass or brush clearance operations shall not engage in any other activities during their actual clearance of grass or brush;
- Individuals engaged in grass or brush clearance operations shall use an appropriate extinguishing agent immediately to extinguish a fire;
- All fires, regardless of size, shall be reported immediately via the 9-1-1 system to the Fire Department;
- A Class 2-A two gallon water fire extinguisher, pressurized garden hose with attached nozzle (fully open), or comparable pressurized Class 2-A extinguishing device, shall be within 10 feet of any grass or brush clearance operation;
- Where a gasoline container is present at the site of the grass or brush clearance operation, a minimum 4A 60 B:C dry chemical fire extinguisher shall be within 10 feet of the brush clearance operation;
- A cell phone capable of dialing 9-1-1 shall be charged and readily accessible to the grass or brush clearance operation; and
- A safety strap shall be used at all times for any tool or appliance with hot exhaust. Hot exhaust shall not come in contact with any brush, grass, flash fuels, or other flammable material.

With adherence to these requirements, which have been formulated to protect development against wildland fires in hillside areas, the Project would not exacerbate wildfire risks. Therefore, the Project would not expose project occupants to pollutant concentrations from a wildfire. ***As such, the Project would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, impacts would be less than significant.***

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. As previously discussed, the Project Site is located within a VHFHSZ. As outlined above, the Project would comply with all of the requirements for properties located within a VHFHSZ, as well as other applicable fire regulations. The Project would also make the areas available to LAFD and other emergency responders as a staging area in the event of an emergency. Specifically, emergency vehicle access would be provided via a driveway from Ventura Boulevard along the eastern boundary of the Project Site. In addition, the existing water infrastructure would be available to serve fire suppression needs at the Project Site, as discussed above, and no other maintenance or infrastructures would need to be installed to address fire risk. ***Therefore, the Project would not require the***

installation or maintenance of infrastructure that may exacerbate fire risk or that would result in impacts to the environment, and impacts would be less than significant.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. The Project Site is located within a VHFHSZ.[217] Construction of the Project would be limited to the boundaries of the Project Site and would not include construction activities in the surrounding vicinity such that stability of the surrounding properties would be compromised. Additionally, upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. The Project would also make the new parking areas available to LAFD and other emergency responders as a staging area in the event of an emergency. In addition, the Project would install drought tolerant landscaping and irrigation on the Project Site, which will help reduce the risk of fire in and around the parking areas.

Moreover, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. ***Therefore, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant.***

Cumulative Impacts

Less Than Significant Impact. As listed in Table 35 on page 329 and shown in Figure 16 on page 330 in the analysis further below, there are five related projects within 0.75 mile of the Project Site. Similar to the Project, the related projects are located in highly urbanized areas and would not contain wildland features or be located adjacent to any wildland areas. As with the proposed Project, any related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to fire and seismic hazards, including those required of properties within the VHFHSZ (all of the related projects except Related Project No. 5 are located within the VHFHSZ). The Project, and all related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety. ***As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and impacts would be less than significant.***

[217] City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 2375021027, 2375021028, and 2375021029, http://zimas.lacity.org/, accessed June 2, 2021.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. Based on the analyses contained under Item I through Item XX above, with adherence to regulatory compliance measures and implementation of project design features and mitigation measures, the Project would not have the potential to degrade the quality of the environment and would not result in any significant unavoidable impacts to the environment. The Project Site is located within an urbanized area and is currently developed with an existing hotel and surface parking. There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan that applies to the Project. The Project Site is located adjacent to the Los Angeles River. Implementation of Project Mitigation Measure BIO-MM-1 would ensure that no significant impacts to the River would occur as a result of the Project. In addition, the Project Site does include ornamental trees and landscaping that could support nests for migratory birds or other habitat for urban species. Adherence to the Migratory Bird Treaty Act and the California Fish and Game Code and incorporation of RTP/SCS Mitigation Measures PMM BIO-1(g) and PMM BIO-1(i) from the 2020–2045 RTP/SCS PEIR MMRP would ensure that the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Implementation

of Project Mitigation Measure BIO-MM-1 would ensure that the Project would not conflict with any local policies or ordinances protecting biological resources (e.g., protected trees). Thus, the Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed under Item V, Cultural Resources, Item VII, Geology and Soils, and Item XVIII, Tribal Cultural Resources, with implementation of the City's Conditions of Approval regarding the potential inadvertent discovery of archaeological or paleontological resources, and with incorporation of Mitigation Measures TCR-MM-1 regarding the accidental discovery of a tribal cultural resource, impacts to archeological resources, paleontological resources, and tribal cultural resources would be less than significant. Thus, overall, no evidence is presented that the Project would degrade the quality of the environment.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. The cumulative analysis in this SCEA takes into consideration the five related projects listed in Table 35 on page 329 and shown in Figure 16 on page 330. The list of related projects is based on information provided by LADOT and the Department of City Planning on January 14, 2021, and other recent studies, and include developments within one-quarter mile radius of the furthest outlying intersection, as suggested in the Transportation Assessment Guidelines. Therefore, related projects within 0.75 mile of the Project Site were considered. Although these projects serve as the primary bases for evaluation of cumulative impacts, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. A significant impact may occur if the Project, in conjunction with the five related projects, would result in impacts that would be significant when viewed together, even if impacts would otherwise not be considered significant when projects are analyzed on an individual basis.

The cumulative analyses for each environmental issue area are contained under Item II through Item XX, above, following the assessments of Project impacts. Based on these analyses, cumulative impacts related to all of the above environmental factors would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. Based on the analyses contained under Items I through Item XX above, the Project could result in potentially significant impacts with regard to Biological Resources, Geology and Soils, Hazards and Hazardous Materials, Noise, Transportation, and Tribal Cultural Resources. However, as outlined above, all of these potentially significant impacts would be reduced to less than significant levels. Therefore, the Project would not have significant environmental effects on human beings, either directly or indirectly.

Table 35
Related Projects

No.	Project Name/Address	Description	Unit/Area
1	Mixed-Use 12582 Ventura Boulevard	Mixed-Use	N/A
2	Mixed-Use 12544 W. Ventura Boulevard	Apartments	28 du
		Restaurant	16,580 sf
3	Mixed-Use 12548 W. Ventura Boulevard	Mixed-Use	N/A
4	The Shops at Sportsmen's Lodge 12833 Ventura Boulevard	Restaurant	24,251 sf
		Retail	37,518 sf
		Health Club	30,000 sf
		Ancillary Space	6,036 sf
5	Harvard-Westlake River Park Project 4047–4155 N. Whitsett Avenue	Park	17.2 ac
		Gymnasium	80,249 sf

ac = acres
du = dwelling units
N/A = not applicable
sf = square feet
Source: Gibson Transportation Consultants, Inc and Eyestone Environmental, 2021.

Figure 16
Related Projects

Source: Gibson Transportation Consulting, Inc., November, 2021.

6 MITIGATION MONITORING PROGRAM

6.1 INTRODUCTION

This Mitigation Monitoring Program ("MMP") has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Sustainable Communities Environmental Assessment (SCEA) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project's impacts in the SCEA takes into consideration the project design features (PDFs) and incorporates all feasible mitigation measures from all Program Environmental Impact Reports (PEIRs) applicable to the Project Site, and applies mitigation measures (MMs) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

6.2 ORGANIZATION

As shown on the following pages, each identified project design feature and mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: the agency with the power to enforce the PDF or MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the PDF or MM shall be monitored.
- Monitoring Frequency : the frequency at which the PDF or MM shall be monitored.
- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

6.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

6.4 PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

6.5 MITIGATION MONITORING PROGRAM

I. Air Quality

RTP/SCS PEIR Mitigation Measures

RTP/SCS Mitigation Measure PMM AQ-1(q): Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible (ZE/ZNE technologies are not necessary to mitigate construction air quality impacts associated with the Project and will not be included as part of Project mitigation).

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; South Coast Air Quality Management District
- **Monitoring Agency:** City of Los Angeles Department of City Planning or City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during Project plan check; Periodically during field inspection
- **Action(s) Indicating Compliance:** Plan check approval; Field inspection sign-off

II. Biological Resources

Project Mitigation Measures

BIO-MM-1: Prior to commencement of construction activities, the Project Applicant shall designate a Project Arborist. The Project Arborist shall review the final design of the Project and shall be notified at least 96 hours before: (a) clearing and grading of the Project Site; (b) digging, excavation, trancing, or building with the canopy of the dripline of the off-site protected tree (Tree OP130); (c) pruning of Tree OP130's canopy or roots; and (d) commencement of any other activity within the canopy dripline of Tree OP130. The Project Arborist will also be on-site for construction monitoring and Project milestones, as follows:

Protective Fencing: Prior to the commencement of construction activities, the Project Applicant shall ensure that the protected tree located adjacent to the Project Site on the northeast (Tree OP130) is properly protected by fencing. The

existing chain link fencing along the eastern property line near Tree OP130 shall be retained throughout demolition activities. Upon completion of demolition activities, protective fencing shall be installed 15 feet from the trunk of Tree OP130. Protective fencing shall also be placed around the street trees along Ventura Boulevard that will be retained. Protective fencing shall remain in place until Project construction is complete. The Project Arborist shall inspect all protective fencing upon installation.

Fencing around Tree OP130 shall be chain-link and a minimum of five feet high, held in place by steel stakes driven directly into the ground. Gates shall be installed, as required for operational access, but shall not be utilized for construction activities. No workers shall enter the fenced protection zones. No debris or equipment storage, waste disposal, equipment cleanout, outhouse, or vehicle parking shall be allowed within the fenced areas.

Demolition: The existing surface parking area located adjacent to the Los Angeles River should be demolished in a backwards direction within 15 feet of the trunk of Tree OP130. Demolition will take place from on top of the parking area, and demolition debris will be pulled away from the tree and onto the remaining parking area. No debris will be allowed to fall within 15 feet of Tree OP130, and all demolition equipment and personnel should be kept out of the 15-foot protection zone around the tree.

Exploratory Trenching: In the event that excavation must happen within 15 feet of Tree OP130, an exploratory trench shall be dug along the proposed limit of excavation within 15 feet of the trunk of Tree OP130. The trench shall be as deep as the required excavation and as wide as necessary (away from the tree) to accommodate digging. The exploratory trench shall be dug using hand tools or an AirSpade only, and any roots less than 2 inches in diameter shall be cut cleanly using a sharp saw or pruning tool. No roots 2 inches or larger in diameter shall be cut during digging. The Project Arborist shall inspect the exploratory trench and provide mitigation recommendations accordingly.

Excavation: If roots 2 inches or greater in diameter are encountered during excavation near Tree OP130, cuts shall be made cleanly with a sharp saw or pruning tool, far enough behind any damage that all split and cracked root portions are removed. The cut will be made at right angles to the root so that the wound is no larger than necessary. When practical, roots will be cut back to a branching lateral root. Pruning wound treatment will not be applied to cuts.

Clearance Pruning: The Project Arborist shall be consulted prior to clearance pruning of Tree OP130. All pruning will be carried out by an ISA Certified Arborist, or under the oversight of the Project Arborist. All pruning shall conform to ANSI A-300 standards at a minimum.

Landscaping: When designing and installing landscape, irrigation, and hardscape around Tree OP130, the following measures shall be followed:

- No planting of any type, irrigation, or irrigation overspray shall occur within 10 feet of Tree OP130;
- Only drought tolerant or native plants shall be planted within 20 feet of the trunk of Tree OP130;
- No lawn or groundcover requiring frequent irrigation shall be planted within the canopy dripline of Tree OP130;

- Unless otherwise recommended by the Project Arborist, 3 to 4 inches of organic mulch (freshly chipped tree trimmings) should be maintained within 20 feet of Tree OP130, wherever possible;
- Underground irrigation lines should be kept out of the canopy dripline of Tree OP130 to the extent possible and should be installed (when they are necessary within the dripline) without doing any root damage to the tree. Irrigation trenching within the canopy dripline of Tree OP130 shall be done using hand tools only.

RTP/SCS PEIR Mitigation Measures

RTP/SCS Mitigation Measure PMM BIO-1(g): Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.

- **Enforcement Agency:** California Department of Fish and Wildlife; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once, prior to issuance of grading permits
- **Action(s) Indicating Compliance:** Issuance of applicable building permit

RTP/SCS Mitigation Measure PMM BIO-1(i): Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.

- **Enforcement Agency:** California Department of Fish and Wildlife; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once, prior to issuance of grading permits; or, if vegetation removal, building demolition, or grading is initiated during the nesting season, as determined by a qualified biologist (provide proof of compliance)
- **Action(s) Indicating Compliance:** Issuance of applicable building permit

III. Hazards and Hazardous Materials

Project Mitigation Measures

HAZ-MM-1: Prior to construction of the Project, a gas screening survey shall be conducted to evaluate the level of volatile organic compounds (VOCs) in the soil gas beneath the Project Site to determine if the levels exceed current regulatory guidance concentrations. Based on the findings, any impacted soil shall be removed and disposed of in accordance with SCAQMD Rule 1166. The gas screening survey will also analyze whether there is the potential for release of vapors from potentially contaminated groundwater and, if required, the Project will comply with

applicable regulations, including the installation of a vapor barrier or membrane to address any vapor release.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Field inspection sign-off

HAZ-MM-2: Prior to construction of the Project, the existing groundwater monitoring well located in the southeast portion of the Project Site shall be sampled to evaluate the origin(s) of volatile organic compounds (VOCs) in soil gas and subsequently abandoned under a permit issued by the Los Angeles County Health Department.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; Los Angeles County Health Department
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Issuance of permit by the Los Angeles County Health Department

IV. Noise

Project Mitigation Measures

NOI-MM-1: Prior to commencement of construction, the Project Applicant shall erect temporary and impermeable sound barriers at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Within the northern portion of the Project Site between the construction areas and the residential uses at receptor locations R1 and R7. The temporary sound barrier shall be designed to provide a minimum 6-dBA and 16-dBA noise reduction, or not to exceed the ambient noise by 5 dBA, at the ground and upper levels of the residential uses at receptor locations R1 and R7, respectively. The temporary sound barrier shall be 24 feet tall in order to block line of sight between the on-site construction activities and off-site sensitive receptors at receptor locations R1 and R7, respectively.
- Within the western portion of the Project Site (along Coldwater Canyon Avenue) between the construction areas and residential use at receptor location R2. The temporary sound barrier shall be designed to provide a minimum 12-dBA noise reduction, or not to exceed the ambient noise by 5 dBA, at the ground and upper levels of receptor location R2. The temporary sound barrier shall be 18 feet tall in order to block line of sight between the on-

site construction activities and off-site sensitive receptors at receptor location R2.

- Within the southern portion of the Project Site between the construction areas and residential uses on the south side of Ventura Boulevard, receptor locations R5 and R6. The temporary sound barrier shall be designed to provide a minimum 5-dBA and 10-dBA noise reduction, or not to exceed the ambient noise by 5 dBA at the ground level of receptor locations R5 and R6, respectively. The temporary sound barrier shall be 8 feet tall (at the west end) to 24 feet tall (at the east end) in order to block line of sight between the on-site construction activities and off-site sensitive receptors at receptor locations R5 and R6, respectively.
- **Enforcement Agency:** City of Los Angeles Department of City Planning or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once at field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of applicable building permit; submittal of compliance report from noise consultant

Project Mitigation Measures

TR-MM-1: The Project shall incorporate additional TDM strategies as mitigation, as follows:

- Voluntary travel behavior change program with 100 percent of residents eligible.
- Reduce parking supply by at least 13.5 percent
- Unbundle parking with a monthly charge of at least $100
- **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at Project plan check prior to issuance of building permits; Once prior to issuance of Certificate of Occupancy
- **Action(s) Indicating Compliance:** Approval of TDM strategies by City of Los Angeles Department of Transportation; Issuance of Certificate of Occupancy; Submittal of compliance documented by Applicant

V. Tribal Cultural Resources

Project Mitigation Measures

TCR-MM-1: Prior to commencing any ground disturbance activities at the Project Site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts,

augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s) shall be approved by the Fernandeño-Tataviam Band of Mission Indian (FTBMI). Any qualified archaeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources (OHR).

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the Project Site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archaeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources.

Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and OHR.
2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage

Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.
6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.
8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

- **Enforcement Agency:** City of Los Angeles Department of City Planning, Office of Historical Resources
- **Monitoring Agency:** City of Los Angeles Department of City Planning, Office of Historical Resources
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Monitoring to be determined by qualified archaeologist

- **Action(s) Indicating Compliance:** Completion of compliance documentation prior to issuance of demolition or grading permit; If discoveries are found, submittal of compliance documentation by qualified archaeologist