



City of Los Angeles

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



DRAFT ENVIRONMENTAL IMPACT REPORT

CANOGA PARK-WINNETKA-WOODLAND HILLS-WEST HILLS COMMUNITY PLAN AREA

Vesting Tentative Tract No. 67505

Case Number: **ENV-2005-2301-EIR**

State Clearinghouse Number: 2005111054

Project Location: 22255 and 22241 W. Mulholland Drive, Los Angeles, CA 91364

Council District: 3

Project Description: The Proposed Project is the subdivision of a 6.2-acre property (two parcels) into 19 lots and the subsequent development of 19 detached, single-family residences. Each residence would have three or four bedrooms and would have a maximum height of three stories or 36 feet, as established by the Mulholland Scenic Parkway Specific Plan Inner Corridor regulations. Each unit would include a two-car garage. There would also be 38 covered parking spaces for residents. A new public street would provide vehicular access from San Feliciano Drive to 11 of the homes. Four additional homes would have direct driveway access from San Feliciano Drive, while the four remaining homes would take access from a private driveway off of Mulholland Drive. Within the site, Project building footprints would account for approximately 0.86 acre (or 13.8 percent of the total Project Site), hardscape and impervious surfaces would cover 0.96 acre (15.5 percent of the site), landscaped areas would comprise 1.35 acres (21.7 percent of the site), and 3.03 acres (48.9 percent of the site) would remain as undisturbed naturally vegetated open space. One abandoned single-family residence and associated structures existing on-site would be demolished. An estimated 3,040 cubic yards of soil would be excavated and remain on the Project Site, with approximately 4,200 cubic yards of additional fill material imported to the Project Site in order to balance cut and fill during grading operations. Haul route approval would be required. Of the existing 199 trees (including 166 protected trees) located on-site, 28 (including 15 protected trees) would be removed in order to develop the Proposed Project.

APPLICANT:

Harridge San Feliciano, LLC

PREPARED BY:

CAJA Environmental Services

The City of Los Angeles

Department of City Planning
Environmental Analysis Section

ON BEHALF OF:

March 2016

DRAFT ENVIRONMENTAL IMPACT REPORT

VESTING TENTATIVE TRACT NO. 67505

Case No. ENV-2005-2301-EIR

PREPARED FOR:

City of Los Angeles
Department of City Planning
Environmental Review Unit
200 N. Spring Street, Room 750
Los Angeles, California 90012

APPLICANT:

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March 2016

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I. INTRODUCTION

PROJECT APPLICANT

The Project Applicant for Vesting Tentative Tract No. 67505 is Harridge San Feliciano, LLC, 6363 Wilshire Boulevard, Suite 600, Los Angeles, CA 90048.

PROPOSED PROJECT

The Proposed Project is the infill subdivision of a 6.2-acre, irregularly shaped property consisting of two parcels into 19 lots and the subsequent development of 19 single-family residences. Each residence would have three or four bedrooms and would have a maximum height of three stories or 36 feet, as established by the Mulholland Scenic Parkway Specific Plan Inner Corridor regulations. There would be no basements, subterranean floors and no stepped pads. The specific architectural style of the proposed homes has not yet been determined; however, the selected style(s) will be designed to be compatible with the architectural styles already existing in the area and to be consistent with the Specific Plan. The Project would provide a total of 38 covered parking spaces, including a two-car garage for each unit.

The Project Site measures 6.2 acres of total lot area, of which building footprint (home pad) coverage would account for approximately 0.86 acre (37,462 square feet or 13.8 percent of the total Project Site). Approximately 0.96 acre (41,861 square feet or 15.5 percent of the site) would be covered by other forms of impervious surfaces, including streets/driveways, patios, and walkways. A total of 1.35 acres (58,625 square feet or 21.7 percent of the site) would be covered with landscaping. In addition, approximately 3.03 acres (or 132,116 square feet or 48.9 percent of the site) would remain as undisturbed open space.

For site access, the Project proposes to construct a new public street, with a 54-foot wide right-of-way, which would extend from San Feliciano Drive into the Project Site and would end in a cul-de-sac, providing access to 11 of the proposed homes. A private driveway would extend from Mulholland Drive into the Project Site to provide access to four of the proposed homes. No connection between the new street and the driveway would exist. The remaining four homes would each have direct driveway access from San Feliciano Drive. All proposed street and home lighting would be designed to be consistent with the applicable Mulholland Scenic Parkway Specific Plan objectives and standards, as well as all other applicable City standards. The Project would utilize low intensity exterior lighting to minimize potential glare and night sky illumination.

Grading for the Project would involve the excavation (cut) of approximately 3,040 cubic yards. The proposed grading would require approximately 7,240 cubic yards of fill to balance the site, resulting in the proposed import of 4,200 cubic yards of material to the site. All excavated material would be used as fill on the Project Site. All manufactured slopes would have a maximum horizontal to vertical ratio of 2 to 1. The Project would utilize four retaining walls ranging from 0.5 to 19 feet in height in lieu of slopes to reduce the number of impacted coast live oak trees.

A more detailed description of the Proposed Project is presented in Section III, Project Description, of this Draft EIR.

PROJECT HISTORY

An application for a Vesting Tentative Tract Map (No. 61553) on the Project Site was originally submitted to the City in 2005. This proposed development would have consisted of the development of 37 detached single-family condominium homes. This proposal included a through private roadway connecting Mulholland Drive and San Feliciano Drive across the site. As originally proposed, this development would have required a change of zoning on the site from R-1-1 (single-family zone) to RD-6 (restricted density multiple-dwelling zone) because the proposal was configured on two lots as a condominium development. This original version of the Project is referred to as the “Original Project” throughout this EIR, while the terms “the Project”, “Proposed Project” or “Revised Project” are used to refer to the current version of the Project.

INTRODUCTION

Purpose of the Draft EIR

The purpose of this Draft Environmental Impact Report (Draft EIR) is to inform decision makers and the general public of the potential environmental impacts resulting from the proposed Vesting Tentative Tract No. 67505 Project (the Project or Proposed/Revised Project).

The Project would require approval of certain discretionary actions by the City and other governmental agencies. Therefore, the Project is subject to environmental review requirements under the California Environmental Quality Act (CEQA).¹ For purposes of complying with CEQA, the City of Los Angeles, Department of City Planning, Environmental Review Section, at 200 N. Spring Street, Room 750, Los Angeles, CA 90012 is identified as the Lead Agency for the Project.

As described in Section 15121(a) and 15362 of the Guidelines for the California Environmental Quality Act (CEQA Guidelines)², an environmental impact report is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to mitigate any significant environmental effects, and identify and evaluate a reasonable range of alternatives to the project that have the potential to mitigate or avoid the project’s potential significant environmental effects while feasibly accomplishing most of the project’s basic purposes. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project’s potential effects, on the environment, which the Lead Agency has determined are or may be significant. In

¹ Public Resources Code Sections 21000-21178.

² California Code of Regulations Title 14, Chapter 3, Sections 15000-15387.

addition, when applicable, the Draft EIR recommends feasible mitigation measures that can reduce or avoid significant environmental impacts.

This Draft EIR was prepared in accordance with Section 15151 of the CEQA Guidelines, which defines the standards for adequacy of an environmental impact report:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a Project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

This EIR has been prepared by the City of Los Angeles in accordance with the CEQA Guidelines.

Environmental Review Process

Original Project (Vesting Tentative Tract Map No. 61553)

To determine which environmental topics should be addressed in this EIR, the City of Los Angeles prepared an Initial Study for the Original Project, which is included in Technical Appendix A of this Draft EIR. The purposes of the Initial Study, as set forth in Section 15063(c)(3) of the CEQA Guidelines, are to assist the preparation of an environmental impact report by:

- (A) focusing the environmental impact report on the effects determined to be significant;
- (B) identifying the effects determined not to be significant;
- (C) explaining the reasons for determining that potentially significant effects would not be significant; and
- (D) identifying whether a program environmental impact report, tiering, or another appropriate process can be used for analysis of the project's environmental effects.³

The results of the Initial Study indicated that the Original Project would have potentially significant impacts with respect to the following environmental concerns:

³ *In the case of the Project, the appropriate process for analyzing the project's environmental effects is the preparation of a "Project EIR," the most common type of EIR prepared for specific development projects. This Draft EIR constitutes a "Project EIR" under Section 15161 of the CEQA Guidelines.*

- Aesthetics
- Air Quality
- Biological Resources
- Hazards and Hazardous Materials
- Land Use Planning
- Noise

The Notice of Preparation (NOP) for the Original Project was initially circulated from November 8, 2005 to December 8, 2005 in order to receive input from interested public agencies and private parties. Subsequently, the comment period was extended for an additional two weeks, until December 22, 2005, in order to give interested parties ample time to submit their comments. Copies of the Notice of Preparation and the NOP comment period extension letter are included in Technical Appendix B of this Draft EIR. Input from interested public agencies and private parties were received in written form, copies of which are also presented in Appendix B of this EIR. In addition, a number of comment letters were received prior to the circulation of the NOP. These letters are included in Technical Appendix C. When the same comment letter was submitted more than once, prior to and after the circulation of the NOP, or when the same letter was addressed to more than one individual, only the comment letter with the earliest date is included in the Appendices. A total of 78 unique comment letters on the Original Project were received either prior to or during the circulation of the NOP. No public scoping meetings were held on the Original Project.

In addition to the environmental concerns previously identified by the Initial Study, the comment letters also identified the following concerns:

- Traffic
- Police Services
- Utility Infrastructure

The issue of Project traffic generation was added to the list of concerns addressed in the Draft EIR for the Original Project. The issues of school-related traffic hazards, police services and utility infrastructure were determined not to be potentially significant by the Initial Study and therefore were not assessed in the Draft EIR for the Original Project. The basis for this determination is provided in both the Initial Study and in Section V.A of this Draft EIR.

The City circulated a Draft EIR for the Original Project for public review and comment from February 20, 2007 to April 6, 2007. During that time, the Department of City Planning received a total of 45 comment letters. The City prepared a Final EIR for the Original Project, including responses to all comments, and released it for public review in January 2008. Subsequently, however, the previous Project Applicant placed the Original Project application on hold and the City ultimately did not take any action on either the Original Project or EIR.

Revised Project (Vesting Tentative Tract Map No. 67505)

The Revised/Proposed Project (or the Project) proposes a development with reduced density and reduced building footprint as compared to the Original Project. Therefore, the City concluded that the information obtained during the NOP circulation for the Original Project is valid for determining the scope of this Draft EIR for the Revised Project. Thus, no new NOP was circulated for this Draft EIR.

Since the Revised/Proposed Project is a reduced version of the Original Project, located on the same site, the scope of this Draft EIR is identical to the scope of the previous EIR, with the addition of a new section analyzing the Project's greenhouse gas emissions. Since the date of issuance of the previous EIR, the state CEQA Guidelines have been revised to require the evaluation of the potential for a project to increase greenhouse gas emissions.

Based on the analysis contained in the Initial Study, the City determined that the Project would not have the potential to result in environmental impacts to agricultural and forestry resources, cultural resources, geology and soils, hydrology and water quality, mineral resources, population and housing, public services, recreation, or utilities and service systems. These issues are listed and discussed in Section V.A., Impacts Found to Be Less Than Significant, of this Draft EIR.

Based on a review of environmental issues by the City, the Initial Study, and the responses to the NOP, this Draft EIR analyzes the following environmental issues:

- Aesthetics
- Air Quality
- Biological Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Transportation/Traffic

Organization of the Draft EIR

The Draft EIR is organized into eight sections as follows:

Section I (Introduction): This section provides an introduction to the environmental review process and a summary of the Project description.

Section II (Summary): This section provides a summary of the Project's environmental impacts and mitigation measures.

Section III (Project Description): A complete description of the Project including Project location, Project Site characteristics, Project characteristics, Project objectives, and required discretionary actions is presented.

Section IV (Environmental Setting): An overview of the environmental setting of the Project is provided including a description of existing and surrounding land uses, and a list of other projects in the vicinity.

Section V (Environmental Impact Analysis): The Environmental Impact Analysis section is the primary focus of this Draft EIR. Separate discussions are provided to address the potential environmental effects of the Project. Each environmental issue contains a discussion of existing conditions, an assessment and discussion of the significance of impacts associated with the Project, mitigation measures, cumulative impacts, and level of impact significance after mitigation.

Section VI (General Impact Categories): This section provides a summary of significant and unavoidable impacts of the Project, a discussion of potential growth inducing effects, and an explanation of the significant irreversible environmental changes.

Section VII (Alternatives to the Project): This section includes an analysis of a range of reasonable alternatives to the Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the Project and alternatives that would avoid or substantially lessen any of the significant effects of the Project.

Section VIII (Preparers of the Draft EIR and Persons Consulted): This section presents a list of City, County, and other agencies and consultant team members that contributed to the preparation of the Draft EIR.

Section IX (Acronyms and Abbreviations): This section provides definitions for all of the acronyms and abbreviations used in this Draft EIR.

Public Participation

Public participation is an essential part of the CEQA process. To provide full public disclosure of potential environmental impacts that may occur as a result of a Proposed Project, CEQA requires the Draft EIR be circulated during the public review period to all responsible agencies, trustee agencies, and to the general public. The Draft EIR for Vesting Tentative Tract No. 67505 will be circulated for a period of 45 days (in accordance with State CEQA Guidelines §21091(a)). During this review period, all public agencies and interested individuals and organizations are encouraged to provide written comments addressing their concerns with the adequacy and completeness of the EIR. When providing written comments on the subject matter of the EIR, the readers are referred to State CEQA Guidelines, 151204(a), which state:

In reviewing Draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

All comments on the Draft EIR should be submitted in writing to the City of Los Angeles, Department of City Planning, at the following address:

Milena Zasadzien
Department of City Planning, Major Projects Section
6262 Van Nuys Boulevard, Suite 351
Van Nuys, California 91401
Phone: (818) 374-5054
Email: milena.zasadzien@lacity.org

Case Number: ENV-2005-2301-EIR

A copy of the Draft EIR will be made available to the general public at the City of Los Angeles Department of City Planning at the address listed above.

Following the public review period and receipt of all public and agency comments, the City will prepare a Final EIR. The Final EIR will include additions and corrections to the Draft EIR as applicable, written responses addressing the comments and recommendations received by individuals and entities during the public review period, and a final mitigation monitoring and reporting program. The City's responses to comments on the Draft EIR must demonstrate a good faith and responsive analysis, and may not be

conclusory.⁴ However, when responding to comments on the Draft EIR, the City need only respond to significant environmental issues and does not need to provide all information requested by reviewers.⁵

⁴ CEQA, P.R.C. § 21091 (d), and State CEQA Guidelines, C.C.R. § 15088 (b).

⁵ State CEQA Guidelines, Section 15204(a).

II. SUMMARY

SUMMARY OF THE PROPOSED PROJECT

The Proposed Project is the infill subdivision of a 6.2-acre, irregularly shaped hillside property consisting of two parcels into 19 lots and the subsequent development of 19 single-family residences. Each residence would have three or four bedrooms and would have a maximum height of three stories or 36 feet, as established by the Mulholland Scenic Parkway Specific Plan Inner Corridor regulations. There would be no basements, subterranean floors and no stepped pads. The architectural style of the proposed homes has not yet been determined; however, the selected style(s) will be designed to be compatible with the architectural styles already existing in the area and to be consistent with the Specific Plan. The Project would provide a total of 38 covered parking spaces, including a two-car garage for each unit.

The Project Site measures 6.2 acres of total lot area, of which building footprint (home pad) coverage would account for approximately 0.86 acre (37,462 square feet or 13.8 percent of the total Project Site). Approximately an additional 0.96 acre (41,861 square feet or 15.5 percent of the site) would be covered by other forms of impervious surfaces, including streets/driveways, patios, and walkways. Approximately a total of 1.35 acres (58,625 square feet or 21.7 percent of the site) would be covered with landscaping. In addition, approximately 3.03 acres (or 132,116 square feet or 48.9 percent of the site) would remain as undisturbed open space.

Direct access to the Proposed Project homes would be from (i) a new public street to run from San Feliciano Drive into the site, providing access to 11 homes, and terminating in a cul-de-sac, (ii) 4 separate direct driveways from San Feliciano Drive accessing each of 4 homes, and (iii) a shared private driveway from Mulholland Drive accessing 4 homes. The new public street would be approximately 54 feet wide (including sidewalks) and would not be gated. The new public street would not connect to the private driveway.

Each home would provide two covered parking spaces in garages, per current City of Los Angeles Municipal Code regulations (two spaces per dwelling unit). A total of 38 covered parking spaces would be provided. In addition, public parking would be available along the proposed public street.

All lighting would be designed to be consistent with the applicable Mulholland Scenic Parkway Specific Plan standards and policies. Street lighting on the new public street would be consistent with City standards. No lighting would be provided on the private driveways within the Project. Rather, the Project would use low intensity exterior lighting to minimize potential glare and night sky illumination.

PROJECT LOCATION

The 6.2-acre Project Site is located at 22241 and 22251 Mulholland Drive in the City of Los Angeles, within the community of Woodland Hills. The irregularly shaped Project Site is bound by San Feliciano Drive to the north and west and Mulholland Drive to the south and east. The Girard Reservoir (drained in 1989 and currently empty) is adjacent to and north of the Project Site.

AREAS OF CONTROVERSY

Known areas of controversy include project design consistency with the Mulholland Scenic Parkway Specific Plan. Section V of this Draft EIR assesses this issue.

ISSUES TO BE RESOLVED

No known issues concerning the project remain unresolved.

SUMMARY OF ALTERNATIVES

Alternative 1: No Project (No Construction)

Under the No Project Alternative, the Proposed Project would not be constructed and the Project Site would remain undeveloped. The analysis of the No Project Alternative assumes the continuation of existing conditions. Under Alternative 1: No Project (No Construction), it is assumed that no development within the subject property would occur.

Alternative 2: Park Alternative

Under this alternative, the 6.2-acre Project Site would be acquired by a public agency and developed as a public park. According to past correspondence with the Santa Monica Mountains Conservancy, there is some possibility that the Conservancy, the Department of Recreation and Parks, or the Mountains Recreation and Conservation Authority (MRCA) could take over ownership and/or management of all but the northeastern one acre of the adjacent Los Angeles Department of Water and Power's (DWP) 5.91-acre Girard reservoir property.¹ If one of these agencies were also to acquire the Project Site, which abuts almost 50 percent of the Girard Reservoir perimeter, a public park of approximately 11 acres could be created by combining the two properties. It is noted that the Park Alternative does not meet the Project Applicant's objectives. However, it is included in this Draft EIR in responses to requests from the community for its assessment.

¹ Correspondence from Elizabeth A. Cheadle, Chairperson, Santa Monica Mountains Conservancy to Jonathon Riker, Environmental Review Section, Los Angeles City Planning Department, December 5, 2005.

MAJOR PROJECT IMPACTS AND MITIGATION MEASURES

A summary of the Proposed Project's significant impacts and the mitigation measures that have been identified in this Draft EIR to reduce those impacts is provided in Table II-1.

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
B. AESTHETICS		
<p>Scenic Vistas:</p> <p>The Proposed Project would transform a wooded area into a residential setting, with one of the proposed homes wholly visible and three homes partially visible from the Mulholland Scenic Parkway. However, these homes would be screened from view by the implementation of the Landscape Plan. The consulting landscape architect has indicated that full screening from the new landscaping would occur in approximately five years following planting. Since the proposed homes would not be visible from the scenic parkway upon the maturity of landscaping, the project can therefore be found to “preserve and enhance the unique character and scenic features of the Mulholland Scenic Parkway”.</p> <p>Since the proposed retaining walls would only be minimally visible from Mulholland Drive, the retaining walls would not be expected to have a substantial adverse effect on a scenic vista. Therefore, the aesthetic impact of the retaining walls on a scenic vista would be less than significant.</p> <p>The Proposed Project would remove a total of 28 trees, including 15 <i>Quercus agrifolia</i> and 3 other native trees (Mexican elderberry). Since they are protected, the removal of any oak tree is considered a potentially significant aesthetic impact. These removals will require the following replacement trees; 18 – 36” box <i>Q. agrifolia</i> replacement trees and 6 15-gallon trees to replace the 3 other native trees that would be removed.</p>	<p>Project Design Features:</p> <p>Based on the effectiveness of the proposed Landscape Plan to block views of project homes, impacts to scenic vistas will be less than significant and, hence, mitigation measures are not required under CEQA. Nevertheless, the following Project Design Feature provides more detailed direction for the preparation and implementation of the Landscape Plan. Implementation of this design feature would further reduce the project’s less than significant impacts to scenic vistas.</p> <p>B-1 The project applicant/developer/builder shall prepare and implement a Landscape Plan. The Landscape Plan provides planting and maintenance guidance for common landscaped areas, slopes, and undeveloped building pads. The project applicant/developer/builder shall be responsible for the Plan's implementation until the individual homes are occupied by residents who will take over landscape maintenance responsibilities. The Landscape Plan shall be subject to the review and approval by the Mulholland Scenic Parkway Specific Plan Design Review Board and the City of Los Angeles’ Planning Department prior to issuance of the grading permit. To ensure its implementation, the Landscape Plan shall be incorporated into the project's conditions of approval. Major features of the landscape plan shall include:</p> <p>1) A listing of plant species appropriate for use for both temporary slope stabilization</p>	<p>With implementation of the proposed landscape plan described in Project Design Feature B-1, impacts to scenic vistas would be less than significant.</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
	<p>purposes and long-term landscaping designs for common slope and private yard areas. The plan shall emphasize the use of drought-tolerant, fire retardant, native plant species. Only non-invasive non-native plant species shall be included in the listing of acceptable planting materials. In addition, wherever practical, plants which are relatively pest resistant and which require a minimum of added nutrients shall be utilized in landscaping;</p> <p>2) Retention of a landscape contractor thoroughly familiar with the provisions of the Landscape Plan for ongoing implementation of the Landscape Plan; and</p> <p>3) Preservation and protection of existing trees and shrubs, wherever possible. Procedures for the care and maintenance of native trees retained on the Project Site shall be specified. The project applicant shall provide protected tree maintenance information to purchasers of individual homes within the Proposed Project.</p> <p>4) A design that achieves the total screening of project homes through the planting of new native trees and shrubs.</p>	
Scenic Resources:		

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>The major scenic resource on the Project Site is its trees. There is no rock outcropping, historic buildings, and so forth on the Project Site. Native trees (including oaks and black walnuts) are specifically protected by ordinance in the City of Los Angeles, particularly along the Mulholland Scenic Parkway; therefore, any removal of an oak tree must be considered a potentially significant aesthetic impact on scenic resources.</p> <p>The retaining walls would only be minimally visible from Mulholland Drive and San Feliciano Drive and none of the oak trees would be removed to accommodate the retaining walls; rather, the walls have been proposed as mitigation to reduce impacts to oak trees. Therefore, the retaining walls would not substantially damage scenic resources and their impact with respect to scenic resources would be less than significant.</p> <p>The construction of the proposed homes would reduce visibility of the on-site oak woodland, the site's major scenic resource. Because the reduced visibility of the oak trees could be considered damage to a scenic resource, the Proposed Project would be considered to have a significant aesthetic impact on scenic resources.</p>	<p>The following standard City of Los Angeles and Mulholland Scenic Parkway Specific Plan regulatory compliance measures would reduce potentially significant impacts to scenic resources to a less than significant level:</p> <p>B-8 Prior to the issuance of a grading permit or building permit, the project applicant shall submit a tree report and landscape plan prepared by a Municipal Code-designated tree expert as designated by City of Los Angeles Ordinance No. 177,404, for approval by the Mulholland Scenic Corridor Specific Plan Design Review Board, the City of Los Angeles' Planning Department and the Urban Forestry Division of the Bureau of Street Services.</p> <p>B-9 A minimum of two trees (a minimum of 36-inch box in size) shall be planted for each oak tree that is removed, and a minimum of two trees (a minimum of 15-gallon size) shall be planted for each protected species and native tree that is removed. The value of the protected species trees planted shall be in proportion to the value of the protected species trees removed per Ordinance 177,404, the Mulholland Scenic Parkway Specific Plan and to the satisfaction of the Urban Forestry Division of the Bureau of Street Services and the decision maker.</p> <p>B-10 All work to the Project's protected species trees shall be in accordance with the City of Los Angeles' Protected Tree Ordinance, the Mulholland Scenic Parkway Specific Plan, and LAMC 46.00 <u>et. seq.</u></p>	<p>Impacts to scenic resources (including individual protected trees and the oak woodland) would be reduced to less than significant levels by the implementation of Regulatory Compliance Measures and Mitigation Measures B-8 through B-20.</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
	<p>The following mitigation measures, recommended by the Proposed Project's Horticultural Tree Report, would reduce the impact to oak trees, as scenic resources, to a less than significant level:</p> <p>B-11 The replacement trees shall be planted in the newly landscaped areas of the Project.</p> <p>B-12 The "preserved trees", especially the protected species trees, within 50 feet of the proposed construction areas shall be fenced with a temporary chainlink (or similar) protective fence at their driplines (or at the location of approved encroachment) prior to the start of any onsite grading. This fencing shall remain intact until the City of Los Angeles' Planning Department or Street Tree Division, Bureau of Street Maintenance allows it to be removed or relocated.</p> <p>B-13 All footing excavations within the driplines shall be dug by hand work only, to a maximum depth of 5' (or to a depth that CAL-OSHA, OSHA or local codes allow). Any excavation below the "approved" depth may be done with acceptable machinery. All footings within the preserved tree driplines shall be of "post type" rather than of "continuous type" to lessen potential root damage.</p> <p>B-14 No other on-site protected species trees shall be encroached upon within their driplines other than what is being requested.</p>	

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
	<p>B-15 No “over-excavation” outside of any cut and/or fill slopes (“tops” or “toes”) for the purposed construction shall occur within the dripline of any onsite oak trees, unless required by the project’s structural engineer.</p> <p>B-16 No landscape, irrigation lines, utility lines and/or grade changes shall be designed and/or installed within the dripline of any protected species trees, unless approved by the City of Los Angeles’ Planning Department or Street Tree Division, Bureau of Street Maintenance.</p> <p>B-17 The “bare” areas within the driplines of any onsite or “over-hanging” protected species trees, or within 50’ of approved grading/construction near protected species trees shall be covered with an insect and disease free organic mulch (minimum depth of 2” thick and no closer than 6” from their trunks and extending to approximately ten feet outside the dripline</p> <p>B-18 Mature protected species trees to be retained shall be examined by a qualified arborist prior to the start of construction. Some of the project’s saved protected species trees are in need of minor dead wood removal. No major structural pruning shall be permitted. A qualified arborist shall complete all dead wood removal and/or pruning.</p> <p>B-19 Examination of the trees to be retained shall be performed monthly by a qualified arborist to ensure that they are being adequately protected and</p>	

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
	<p>maintained. Prior to the completion of the Proposed Project, a qualified arborist shall certify in a “letter of compliance” that all concerned tree policies have been adhered to.</p> <p>B-20 Copies of the Proposed Project’s Horticultural Tree Report the City’s Protected Tree ordinance and the Mulholland Scenic Parkway Specific Plan shall be maintained on-site during all project construction.</p>	
<p>Existing Visual Character:</p> <p>Since the proposed development would substantially affect the existing visual character or quality of the Project Site, its impact with respect to existing visual character is considered significant.</p> <p>Because the retaining walls would only be minimally visible from Mulholland Drive and San Feliciano Drive, the use of retaining walls would not substantially degrade the existing visual character or quality of the site and its surroundings.</p> <p>The loss of views of the on-site oak woodland would substantially affect the existing visual character or quality of the Project Site; this impact is considered significant.</p>	<p>Potentially significant impacts to the existing visual character or quality of the site and its surroundings would be reduced to a less than significant level by implementation of Project Design Feature B-1 and Regulatory Compliance and Mitigation Measures B-8 through B-20. In addition, implementation of the following mitigation measures are also required to reduce project impacts to the existing visual character or quality of the site and its surroundings to a less than significant level.</p> <p>B-21 All project homes shall incorporate earth-tone palettes and non-reflective, more naturalistic building materials for exterior surfaces.</p> <p>B-22 All public utilities shall be situated underground.</p>	<p>Impacts to the existing visual character or quality of the site and its surroundings would be reduced to a less than significant level by implementation of Project Design Feature B-1 and Regulatory Compliance and Mitigation Measures B-8 through B-20, and Mitigation Measures B-21 and B-22.</p>
<p>New Source of Substantial Light or Glare:</p> <p>The Proposed Project would create a new source of light that would be visible from the Mulholland Scenic Parkway. The project proposes to provide low intensity lighting and the</p>	<p>Light and glare impacts have been determined to be less than significant and mitigation measures are not required under CEQA. Nevertheless, the following Project Design Features</p>	<p>Impacts from the project’s introduction of new sources of light on the Project Site would</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>remaining tree canopy on the Project Site would be an effective screen for the new lighting. In addition, the area surrounding the Project Site (on Mulholland Drive, San Feliciano Drive, and Mulholland Highway) is already subject to substantial levels of night lighting. The new source of illumination from the Project Site would not be of substantial light or glare which would affect nighttime views in the area. Therefore, the aesthetic impact of the Proposed Project's night lighting would be adverse but less than significant.</p>	<p>would further reduce the less than significant artificial light impacts:</p> <p>B-2 Entrance and all forms of street lighting shall focus illumination downward and into the Project Site. A combination of shielding, screening, and directing the lighting away from off-site areas shall be utilized to minimize "spill-over" effects onto adjacent roadways, properties and open space areas. Wherever possible, lighting fixtures shall be located on the shielded side of the visual barriers.</p> <p>B-3 Lighting fixtures that cut-off light directed to the sky shall be installed in combination with an expanded tree canopy to minimize atmospheric light pollution.</p> <p>B-4 The use of exterior up-lighting fixtures for building facades and trees shall be prohibited. Only downlighting for exterior-building mounted fixtures shall be permitted.</p> <p>B-5 Use of "glowing" fixtures that would be visible from existing communities or public roads shall be prohibited. A glowing fixture is a lantern style fixture, or any fixture that allows light through its vertical components</p> <p>The following Project Design Features would reduce potential glare impacts:</p> <p>B-6 Exterior buildings finishes shall be non-reflective and use natural subdued tones.</p>	<p>be less than significant. However, implementation of Project Design Features B-2 through B-5 would further reduce this impact.</p> <p>Impacts from the project's introduction of new sources of glare on the Project Site would be less than significant. However, implementation of Project Design Features B-6 and B-7 would further reduce this impact.</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
	B-7 All roofs visible from Mulholland Highway shall be surfaced with non-reflective materials.	

C. AIR QUALITY

AQMP		
<p>Development of the Proposed Project is consistent with the land use designated in the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan. SCAG's regional growth forecasts are based upon, among other things, land uses specified in city general plans. Projects that are consistent with SCAG's RTP/SCS are considered consistent with the AQMP growth projections and the Proposed Project would also be consistent with the AQMP growth projections.</p> <p>The Proposed Project would not impair implementation of the AQMP and this impact would be less than significant.</p>	None required or recommended.	Less than significant.
Construction Impacts		
<p>Construction of the Proposed Project would generate pollutant emissions from various construction activities. Construction activities involving site preparation and grading would primarily generate PM₁₀ emissions. Mobile source emissions (use of diesel-fueled equipment onsite and worker trips) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of VOC emissions.</p> <p>The analysis of daily construction emissions has been prepared</p>	<p>The following Mitigation Measures are required to reduce Project construction emissions:</p> <p>C-1 All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 3 emission standards, where available, to reduce NO_x, PM₁₀, and PM_{2.5} emissions at the Project Site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions</p>	Construction air emission impacts would be reduced to a less than significant level with implementation of Mitigation Measures C-1 through C-4.

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>utilizing the CalEEMod 2013.2.2 computer model recommended by the SCAQMD. The model indicates that NO_x emissions generated during the site grading phase and PM_{2.5} and PM₁₀ emissions generated during the site preparation and grading phases would exceed the thresholds recommended by the SCAQMD. Therefore, this impact would be significant.</p>	<p>that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</p> <p>C-2 The use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) shall be required. If the City determines that 2010 model year or newer diesel trucks cannot be obtained, the City shall require trucks that meet U.S. EPA 2007 model year NO_x emissions requirements in their place.</p> <p>C-3 At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided to the City.</p> <p>The following Regulatory Compliance Measure would reduce fugitive dust emissions during Project construction activities:</p> <p>C-4 Construction activities shall comply with SCAQMD Rule 403, including the following measures:</p> <ul style="list-style-type: none"> • Apply water to disturbed areas of the site three times a day. • Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes. • Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to dust/particulate matter generation. • Limit soil disturbance to the amounts analyzed in the 	

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
	Final EIR. <ul style="list-style-type: none"> • All materials transported off-site shall be securely covered. • Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more). • Traffic speeds on all unpaved roads to be reduced to 15 mph or less. 	
Operational Impacts During operation, the Proposed Project would not exceed the established SCAQMD threshold levels for VOC, NO _x , CO, SO _x , and PM ₁₀ . Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.	None required or recommended.	Less than significant.
Local CO Concentrations CO hotspots would not occur near Project area intersections as a result of traffic generated by the Proposed Project, and impacts related to local CO concentrations at these intersections would be less than significant.	None required or recommended.	Less than significant.
D. BIOLOGICAL RESOURCES		
Sensitive Species Removal of natural habitat within the Project Site would contribute incrementally to the loss of natural habitats in the City of Los Angeles. Continuing urbanization displaces and destroys wildlife and permanently removes native plant communities. In particular, the quality of habitats within the	Implementation of the following Mitigation Measures is required to reduce Project impacts to a less than significant level (see also Project Design Feature B-1 and Regulatory Compliance Measures/Mitigation Measures B-8 through B-20 under B. Aesthetics, above):	Less than significant with incorporation of mitigation measures, project design features, and regulatory compliance.

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>Project Site has been diminished by former uses on the Project Site, and surrounding urbanization has largely isolated the property from nearby habitats in the Santa Monica Mountains. Based on these conditions, potential impacts to special status species are less than significant and no mitigation is required.</p> <p>Implementation of the Proposed Project would result in the removal of 15 coast live oak trees as defined by the City of Los Angeles at the time the Tree Report was updated and the site was reevaluated in January 2015. An additional 13 trees, all non-native with the exception of three Mexican elderberry trees, would also be removed to accommodate the Project, for a total of 28 trees removed of the 199 trees on the Project Site. This would be considered a significant impact.</p>	<p>D-1 The 15 removed coast live oak trees shall be replaced with a minimum 36-inch box-size specimen coast live oaks at a minimum 2:1 ratio.</p> <p>D-2 Native trees and shrubs shall be utilized on-site in the landscape plan. Commercially available ornamental trees may be utilized on-site as long as 1) the species is not prohibited for installation by the City of Los Angeles Public Works Department along right-of-ways, and 2) the species has not been identified by the California Invasive Plant Council as an invasive risk in southern California.</p> <p>D-3 Habitat alteration or removal shall be performed outside of the bird nesting season which extends approximately from March 15 through July 31. Should habitat need to be removed during bird nesting season, a detailed nesting survey must be performed by a qualified biologist to determine if active nests are present prior to removal of support resources.</p> <p>D-4 Construction fencing (orange safety fencing) shall be placed around the perimeter of the work site during periods of active construction work, including site grading. Periodic monitoring to insure that fence boundaries are maintained shall be conducted.</p> <p>D-5 Written and verbal instructions will be provided to all construction personnel on-site contractually obligating these personnel to respect the natural environment and</p>	

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
	to avoid, to the extent feasible, causing intentional harm to wildlife on-site during construction activity.	
<p><i>Sensitive Natural Communities</i></p> <p>A substantial portion of the on-site vegetation communities could be impacted due to removal or degradation during Project construction due to grading on-site and along San Feliciano Drive and from home and road installation. Remaining habitat following Project construction may be indirectly impacted due to invasion from installed landscape plants or increases in irrigation or fertilizer usage from new residential lawn or landscaping maintenance. Therefore, an impact to native trees and shrubs is potentially significant and mitigation is required.</p>	See Mitigation Measures D-1 through D-5.	Less than significant with incorporation of mitigation measures, project design features, and regulatory compliance.
<p><i>Jurisdictional Resources</i></p> <p>No wetland or water features that are considered potentially jurisdictional are present on-site; therefore, the project will not result in significant impacts to jurisdictional resources. Relict features such as the former pond and former blue line stream no longer exhibit evidence of ponding (i.e. ordinary high water mark, algal mats or sediment deposits), flow (i.e. ordinary high water mark, scouring, debris pattern or “wrack” line), or aquatic life (i.e. aquatic invertebrates or vertebrates, riparian or hydrophytic vegetation) that would bring them under the regulatory jurisdiction of the Corps, CDFG or RWQCB. Although several erosional gullies have developed along the steep slope at the southwestern corner of the site due to runoff from Mulholland Drive, these features appear to be highly ephemeral (i.e. only flowing after storm events) and do not</p>	None required or recommended.	Less than significant.

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
appear to connect to any jurisdictional features off-site, thus making these features non-jurisdictional.		
<p><i>Wildlife Movement and Habitat Connectivity</i></p> <p>Although mammals and reptiles may currently use cross over Mulholland Drive between the Project Site and the relatively natural habitat areas on the school and park property to the south of Mulholland Drive, the Project Site does not function as part of a true wildlife corridor since wildlife dispersal across the site is currently compromised by vehicle traffic on Mulholland Drive. In addition, the site does not act to connect two significant or large core habitat areas; rather, the site is a relatively small habitat island surrounded almost completely by suburban development.</p> <p>Given that much of the Project Site is nearly surrounded by suburban development and a busy street (Mulholland Drive), it is unlikely that the Project Site is important for wildlife movement or nursery use. In addition, no major migratory routes for mule deer or other important migratory animals have been identified on or adjacent to the site. Therefore, no significant impacts to wildlife movement, migration corridors, or nursery sites will occur from the Project.</p>	None required or recommended.	Less than significant.
<p><i>Conformance with Local Policies and Ordinances</i></p> <p>The Proposed Project would preserve 171 mature trees, including 140 oaks, and require the removal of 28 trees, including 15 oaks on the Project Site. Section 46.00 et seq. of the Los Angeles Municipal Code (LAMC), and Los Angeles City Ordinance No. 177,404 set forth regulations for the preservation of certain protected species trees in the City and</p>	See Project Design Feature B-1, Regulatory Compliance and Mitigation Measures B-8 through B-20, and Mitigation Measures D-1 and D-2.	Less than significant with incorporation of mitigation measures, project design features, and regulatory compliance.

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>further provide that a protected species tree cannot be removed or relocated without first obtaining a permit from the Board of Public Works. In addition, the Proposed Project Site is within the Mulholland Scenic Parkway Specific Plan (MSPSP) and is thus subject to the regulations and requirements of the MSPSP. The MSPSP calls for the preservation of as many mature trees on a Project Site as possible and requires that trees that are removed be replaced as follows: a minimum of two oak trees (minimum of 36-inch box size) are to be planted for each one that is removed, any native tree removed must be replaced at a two for one ratio (minimum of 15-gallon size) with individuals of the same tree type, and any non-native tree removed must be replaced at a one for one ratio (minimum of 15-gallon size). Further, as required by Los Angeles City Ordinance No. 170,978, a comprehensive landscaping program would be implemented for the Proposed Project. Therefore, impacts to protected species trees, native trees and other mature non-native trees on the Project Site from Project construction may be considered potentially significant prior to regulatory compliance and mitigation.</p>		
<p><i>Conformance with Regional Conservation Plans</i></p> <p>No Habitat Conservation Plans, Natural Community Conservation Plans or other such local or regional plans have been adopted that encompass the Project Site; therefore, no impacts are anticipated and no mitigation is considered necessary.</p>	None required or recommended.	Less than significant.
E. GREENHOUSE GAS EMISSIONS		
<p><i>Construction Impacts</i></p> <p>Construction of the Proposed Project would emit GHG</p>	None recommended or required.	Less than significant.

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project Site. These impacts would vary day to day over the 26-month duration of construction activities. Construction emissions of CO ₂ e are estimated to reach a peak level of 15,489 pounds of CO ₂ e per day. Specific significance thresholds for short-term GHG emissions have not been established.		
<p><i>Operational Impacts</i></p> <p>On-going operational GHG emissions for the Proposed Project and its associated BAU scenario are estimated to be 413 and 607 MTCO₂e per year, respectively, which shows the Proposed Project will reduce emissions by 32 percent from the BAU scenario. Based on these results, the Proposed Project meets the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan. As a result, the Proposed Project's contribution to global climate change is not cumulatively considerable and is considered less than significant.</p>	None recommended or required.	Less than significant.
<p><i>Consistency with Applicable Plans</i></p> <p>The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. The Proposed Project would be consistent with a number of relevant plans and policies that govern climate change. In particular, the Proposed Project is consistent with the State's Executive Order S-3-05, which calls for reducing GHG emissions statewide to 1990 levels, including 15.3 percent reductions by 2020. In addition, the Proposed Project is consistent with SCAG's 2012-2035 RTP/SCS, which calls for regional growth and</p>	None recommended or required.	Less than significant.

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>transportation emissions to be consistent with regional and State air pollution objectives. With regard to local policies and regulations, the Proposed Project will comply with the City of Los Angeles' Green Building Ordinance standards that reduce emissions beyond a BAU scenario. The Project would be consistent with all applicable strategies recommended in the AB 32 Scoping Plan. As a result, the Proposed Project's cumulative impact on climate change is considered less than significant.</p>		
F. HAZARDS AND HAZARDOUS MATERIALS		
<p>Construction Impacts</p> <p><i>Asbestos-Containing Materials (ACMs)</i></p> <p>Demolition of the buildings on site could release asbestos-containing materials, if present in the structures. Exposure to workers or residents in the surrounding community to ACMs during demolition could be a significant impact. However, in accordance with the EPA's NESHAP regulation and SCAQMD's Rule 1403, all materials, which are identified as ACMs must be removed by a trained and licensed asbestos abatement contractor. Provided the removal and disposal of ACMs from the Project Site follows the various required guidelines, the Proposed Project would not create a significant hazard to the public or the environment.</p>	<p>Although no significant impacts related to asbestos are expected to occur, the following Regulatory Compliance Measure is required:</p> <p>F-1 Prior to the issuance of the demolition/renovation permits, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403, as well as other state and federal regulations.</p>	<p>Less than significant.</p>
<p><i>Lead-Based Paint (LBP)</i></p> <p>Based on their age, the potential exists for the on-site structures to contain lead-based paint. Exposure to workers to lead paint during demolition structures could be a significant impact.</p>	<p>Although no significant impacts related to lead-based paint is expected to occur, the following Regulatory Compliance Measure is required:</p>	<p>Less than significant.</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>However, prior to demolition, a qualified lead-paint abatement consultant would be required to comply with applicable state and federal rules and regulations governing lead paint abatement. Provided that abatement rules and regulations are followed, hazardous materials impacts caused by exposure to lead-paint would not create a significant hazard to the public or the environment.</p>	<p>F-2 Prior to issuance of permits for any demolition/renovation activity involving a particular structure, a lead-based paint assessment of each existing structure shall be conducted. Lead-based paint found in any buildings shall be removed and disposed of as a hazardous waste in accordance with all applicable regulations.</p>	
<p><i>Oil Pipelines</i></p> <p>There is a potential for the crude oil pipelines in the shoulder of Mulholland Drive to be ruptured during the Project's excavation and grading operations. However, with contractor compliance with standard procedures (e.g. contacting Underground Service Alert of Southern California (Dig Alert)) the project's construction activities would not create a significant hazard to the public or the environment.</p>	<p>The following Mitigation Measure is recommended to ensure that no impact occurs during Project construction related to existing oil pipelines at the site:</p> <p>F-3 A minimum of two full working days (48-hours) prior to the commencement of earthmoving activities on the Project Site, the grading contractor shall contact Underground Service Alert of Southern California (Dig Alert) to obtain a listing of underground utilities in the vicinity of the Project Site. The location of all pipelines in the vicinity of proposed grading shall be clearly marked prior to commencement of grading activities.</p>	<p>Less than significant with implementation of Mitigation Measure F-3.</p>
<p><i>Operational Impacts</i></p> <p><i>Oil Pipelines</i></p> <p>Of the three major means of transporting crude oil from the oil field to the refinery (i.e. pipeline, ocean going tankers or trains), pipelines have by far the best safety record. The Crimson Pipeline has been located in the Mulholland Drive right-of-way</p>	<p>None required or recommended.</p>	<p>Less than significant.</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
adjacent to the project since at least 1944, while the Union Oil pipeline has been in place since at least 1956. Based on these considerations, a major leak or rupture of the adjacent pipelines in the vicinity of the Project Site is considered to be only of a remote possibility. Furthermore, these pipelines run from Ventura County to refineries in the Wilmington area, through a variety of residential communities. There is nothing unique in either the Proposed Project or Project Site that would cause the future residents to be exposed to greater hazards or risk of upset than the residents of surrounding communities through which these pipelines also run. Therefore, the operational risk of upset would be considered less than significant.		
G. LAND USE		
<i>Physically divide an established community:</i> The Proposed Project would not place a barrier between existing land uses or prevent free movement along existing north-south or east-west corridors. Furthermore, the Proposed Project is similar in land use and density to the existing residences to the west of the Project Site. Therefore, the Proposed Project would not physically divide any established communities and there would be no impact.	None required or recommended.	Less than significant
<i>Conflict with any applicable land use plan, policy, or regulation:</i> The Regional Comprehensive Plan and Guide does not include any policies which are generally applicable to the Proposed Project. According to SCAG, the Proposed Project is not regionally significant per SCAG Intergovernmental Review Criteria and CEQA.	None required or recommended.	Less than significant
<i>South Coast Air Quality Management District</i>		

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>The housing growth resulting from the Proposed Project would be consistent with the SCAG's housing forecasts for the City and the County, and would not increase the local housing within the City or County beyond those already projected by the SCAG. Therefore, the Proposed Project would be consistent with the AQMP housing forecasts for Los Angeles County, and would not jeopardize attainment of State and federal ambient air quality standards in the Basin.</p>	<p>None required or recommended.</p>	<p>Less than significant</p>
<p><i>Congestion Management Program</i></p> <p>The local CMP requires that all CMP intersections be analyzed where a project would likely add 50 or more trips during the peak hours. The nearest arterial CMP monitoring station is located on Topanga Canyon Boulevard at Ventura Boulevard. The Proposed Project would not add 50 or more trips to this CMP intersection. Therefore, no significant CMP impacts would occur.</p>	<p>None required or recommended.</p>	<p>Less than significant</p>
<p><i>City of Los Angeles General Plan - Community Plan</i></p> <p>The Project Site is within the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area, which designates the site as Low Residential. The Low Residential designation allows residential densities of up to nine (9) dwelling units per net acre. The Proposed Project consists of 19 units on the approximately 6.20 acre site, which is consistent with the Community Plan land use designation. The Proposed Project can be found to be consistent with the applicable policies of the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan.</p>	<p>None required or recommended.</p>	<p>Less than significant</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p><i>Mulholland Scenic Parkway Specific Plan</i></p> <p>The Project would construct four homes that would encroach into the viewshed of the scenic parkway. The Project would construct retaining walls that exceed the permitted heights and numbers. Also, the Project would remove 15 protected coast live oak trees.</p> <p>While the Proposed Project is not in conformance with all the provisions of the Specific Plan, with approval of the requested discretionary actions (which include additional review and findings for encroachment into the scenic parkway viewshed; Zoning Administrator Adjustments and Determinations with respect to building wall numbers and heights; and a Protected Tree Removal/Relocation Permit - to authorize the removal of 15 protected species trees) from the City of Los Angeles, the Proposed Project could be found not to conflict with the Mulholland Scenic Parkway Specific Plan.</p>	<p>None required or recommended.</p> <p>See Project Design Features and Mitigation Measures under B. Aesthetics.</p>	<p>Less than significant</p>
<p><i>Mountain Fire District and Very High Fire Hazard Severity Zone</i></p> <p>Because the Proposed Project is approximately 2.2 miles from the nearest fire station, the homes would be required to install sprinkler systems. In addition, the Proposed Project would be designed according to California Fire Code requirements and would undergo Los Angeles Fire Department review prior to the recordation of a final map or prior to the approval of a building permit, as is required by the LAMC. With compliance with the Fire Department's requirements, the Proposed Project could be found not to conflict with the Mountain Fire District</p>	<p>None required or recommended.</p>	<p>Less than significant</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
and Very High Fire Hazard Severity Zone.		
<p><i>Protected Tree Ordinance</i></p> <p>A Protected Tree Removal permit would be required for the removal and replacement of up to 15 oak trees in accordance with City of Los Angeles Ordinance 177,404. In accordance with these regulations, prior to the issuance of a grading permit, a tree report and landscape plan prepared by a City-designated tree expert would be submitted to the City. In addition, because the proposed site is within the Mulholland Scenic Parkway Specific Plan area a minimum of two oak trees (minimum of 36-in box size) are to be planted for each one that is removed, and any native tree removed must be replaced at a one for one ratio (minimum of 15-gallon size). Further, a bond would be posted to guarantee the survival of tress which would be maintained, replaced, or relocated to assure the existence of continuously living trees for a minimum of three years from the date the bond was posted or the trees were replaced or relocated.</p>	<p>No mitigation is required or recommended. The Project will comply with the Protected Tree Ordinance and the Mulholland Scenic Parkway Specific Plan.</p> <p>Also, see Mitigation Measures B-10 through B-20 under B. Aesthetics.</p>	Less than significant
<p><i>Hillside Grading Ordinance</i></p> <p>The Project will comply with the requirements of the Hillside Grading Ordinance.</p>	None required or recommended.	Less than significant
<p><i>Habitat Conservation Plans</i></p> <p>There are no habitat conservation plans or community conservation plans that are applicable to the Project Site. Therefore, the Proposed Project would not conflict with any habitat conservation plan or community conservation plan and there would be no impact.</p>	None required or recommended.	Less than significant
H. NOISE		

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>Construction Noise</p> <p>During construction, three basic types of activities would be expected to occur and generate noise. The first activity would involve the preparation of the site for grading by clearing the parcel of debris and vegetation. The second activity would involve the excavation and grading of portions of the Project Site to accommodate the building foundations for the new buildings that are being proposed. The third activity that would generate noise during construction would involve the physical construction and finishing of the new residential buildings.</p> <p>Construction-related noise levels during excavation and grading site may reach approximately 78.6 dBA L_{eq} at the nearest residence. Construction-related noise levels may reach approximately 72 dBA L_{eq} at the closest classroom building of Louisville High School. Construction-related noise levels experienced at these off-site noise-sensitive uses would exceed the City's "conditionally acceptable" exterior noise standard for single-family homes, and the construction noise levels associated with the Proposed Project would also exceed the City's noise standard of 75 dBA at 50 feet from construction and industrial machinery, as stated in Section 112.05 of the LAMC.</p> <p>Because construction noise levels are likely to exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three month period or by more than 10 dBA for more than one day, construction noise impacts would be significant.</p>	<p>The following Regulatory Compliance Measures must be adhered to during Project construction activities:</p> <p>H-1 The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.</p> <p>H-2 The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.</p> <p>H-3 Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.</p> <p>The following Project Mitigation Measures are required to address construction-related noise and vibration impacts:</p>	<p>Less than significant with implementation of Regulatory Compliance Measures and Mitigation Measures H-1 through H-12.</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
	<p>H-4 Construction and demolition activities shall be scheduled to avoid operating several pieces of equipment simultaneously, which causes high noise levels.</p> <p>H-5 The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills, jackhammers, and pile drivers.</p> <p>H-6 Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.</p> <p>H-7 Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 150 feet from the adjacent, off-site residential buildings.</p> <p>H-8 All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance.</p> <p>H-9 Temporary sound barriers, capable of achieving a sound attenuation of at least 12 dBA (e.g., construction sound wall with sound blankets) at 50 feet of distance, and</p>	

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
	<p>capable of blocking the line-of-sight to the adjacent residences shall be installed as feasible.</p> <p>H-10 Two weeks prior to the commencement of construction at the Project Site, notification must be provided to the off-site residential uses located along Mulholland Drive and San Feliciano Drive, and to Louisville High School, disclosing the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.</p> <p>H-11 The Project Applicant shall locate construction staging areas and the operation of earthmoving equipment as far away from vibration-sensitive receptors as possible.</p> <p>H-12 The Project Applicant shall ensure that heavily loaded trucks used during construction shall be restricted to Mulholland Drive and Topanga Canyon Road, and shall be routed away from residential streets surrounding the Project Site.</p>	
<p>Operational Impacts</p> <p><i>Off-site Vehicular Noise</i></p> <p>Off-site noise-sensitive locations surrounding the Project Site could experience a slight increase in noise resulting from the additional traffic generated by the Proposed Project. The Proposed Project would increase local noise levels by a</p>	<p>None required or recommended.</p>	<p>Less than significant.</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>maximum of 0.1 dBA CNEL at two roadway segments in the Project vicinity, while the rest of the analyzed roadway segments would not experience any increases in noise levels. As this the increase in local noise levels at these analyzed roadway segments would not exceed the 5 dBA CNEL threshold, they would not represent a substantial permanent increase in ambient noise levels. Therefore, this impact would be less than significant.</p>		
<p><i>On-site Operational Noise</i></p> <p>The rooftop heating, ventilation and air conditioning systems that would be installed for the new residential buildings would typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. Noise levels associated with the HVAC systems of the proposed homes could exceed the City's exterior noise level standard of 60 dBA CNEL for single-family residential uses; therefore, this impact would be potentially significant.</p>	<p>Implementation of the following Regulatory Compliance Measures would reduce Project impacts to a less than significant level:</p> <p>H-13 The Project Applicant must comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which ensure an acceptable interior noise environment.</p> <p>H-14 The Project Applicant shall ensure that proper shielding will be provided for all new HVAC systems used by each proposed new home such that the interior noise levels at each new home and at existing nearby homes would be below 45 dBA CNEL.</p>	<p>Less than significant with incorporation of Regulatory Compliance Measures H-13 and H-14.</p>
<p><i>Construction Related Groundborne Vibration</i></p> <p>Project construction-related vibration levels may reach approximately 0.027 inches per second PPV at the closest off-site residential property. Because the vibration levels experienced at this off-site property would not exceed the FTA's recommended thresholds for building damage of 0.2</p>	<p>See Mitigation Measures H-11 and H-12.</p>	<p>Less than significant.</p>

Table II-1
Summary of Project Impacts/Mitigation Measures

Environmental Impact	Mitigation Measures/ Project Design Features	Level of Significance After Mitigation
<p>inches per second for non-engineered buildings, this impact would be less than significant.</p> <p>The vibration level that would be experienced by the closest Louisville High School classroom to the Project Site would be approximately 0.004 inches per second PPV. The vibration levels at this location would not exceed the FTA's recommended thresholds for building damage of 0.2 inches per second for non-engineered buildings and this impact would be less than significant.</p>		
I. TRAFFIC AND TRANSPORTATION		
<p><i>Future (2018) With Project Conditions</i></p> <p>At completion and full occupancy, the Project is expected to generate approximately 181 total daily vehicle trips, including 14 trips during the AM peak hour, and 19 trips during the PM peak hour.</p> <p>The Proposed Project is not expected to significantly impact any of the five study intersections. As a result, no off-site mitigation measures are warranted.</p>	None required or recommended.	Less than significant.

Table II-2 presents the Proposed Project's Conditions of Approval identified by the Initial Study, dated August 10, 2005. The Initial Study is included in Technical Appendix A of this Draft EIR. As discussed in Section I, Introduction, the Initial Study was prepared to identify the environmental concerns that may have potentially significant impacts. Those concerns are addressed in detail in Section V, Environmental Impact analysis, of this Draft EIR. The Initial Study also identified a number of environmental concerns whose impacts, while less than significant, could be (1) further reduced and/or (2) their less than significant status could be assured by compliance with the City's standard conditions of approval and/or other standard City requirements. Those Conditions of Approval are reiterated in Table II-2.

Table II-2
Project Conditions of Approval

CULTURAL RESOURCES	
Archaeology	
<ul style="list-style-type: none"> • A qualified archaeologist shall be retained by the project developer to monitor topsoil grading, to ensure that any buried archaeological deposit is not inadvertently disturbed without treatment. • In the event that subsurface archaeological resources/human remains are encountered during the course of grading and/or excavation, all development shall temporarily cease in these areas until the archaeological resources are properly assessed and subsequent recommendations are determined by a qualified archaeologist. In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. These code provisions require notification of the County Coroner and the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. Excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent remains or archaeological resources. • Copies of a subsequent archeological study or report, detailing the nature of any archaeological discovery, remedial actions taken, and disposition of any accessioned remains shall be submitted to the South Central Coastal Information Center at California State University, Fullerton. 	
Paleontology	
<ul style="list-style-type: none"> • Prior to construction, the services of a qualified vertebrate paleontologist approved by the Los Angeles County Vertebrate Paleontology Department (LACM) and the City of Los Angeles shall be retained to implement a mitigation program during earth-moving activities associated with development of the parcel. • The paleontologist shall develop a formal agreement with a recognized museum repository, such as the LACM, regarding the final disposition and permanent storage and maintenance of any fossil remains, as well as the archiving of associated specimen data and corresponding geologic and geographic site data, that might be recovered as a result of the mitigation program, and the level of treatment (preparation, identification, curation, cataloguing) of the remains that would be required before the entire mitigation program fossil collection would be accepted by the repository for storage. • Earth-moving activities (particularly grading and trenching for pipelines) shall be monitored by 	

a paleontologic construction monitor. Monitoring shall include the inspection of fresh exposures created by grading of the unnamed marine shale and in the younger alluvium to allow for the recovery of larger fossil remains. Monitoring shall be conducted on a full-time basis in areas underlain by the marine shale, and a half-time basis once trenching has reached a depth 5 feet below previous grade in areas underlain by younger alluvium. As soon as practicable, the monitor shall recover all vertebrate fossil specimens, a representative sample of invertebrate or plant fossils, or any fossiliferous rock or sediment sample that can be recovered easily. As warranted, fossiliferous sediment samples shall be recovered from the younger alluvium and processed to allow for the recovery of smaller fossil remains (total weight of samples shall not exceed 6,000 pounds). The location and proper geologic context of any fossil occurrence or sampling site shall be documented, as necessary. The monitor shall have the authority to divert grading temporarily around a fossil site until the fossil remains have been evaluated and, if warranted, the remains and/or a fossiliferous rock or sediment sample have been recovered.

- All fossil specimens recovered from the parcel as a result of the mitigation program, including those recovered as the result of processing fossiliferous sediment samples, shall be treated (prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. As appropriate, a sample of the marine shale shall be submitted to a commercial laboratory for microfossil analysis; a sample of fossilized bone, shell, or wood from the younger alluvium shall be submitted for carbon-14 dating analysis; and/or a sample of the alluvium shall be submitted for pollen analysis.
- The monitor shall maintain daily monitoring logs that include the location where monitoring was conducted, the rock unit encountered, fossil specimens or samples recovered, and associated specimen or sample data and corresponding geologic and geographic site data. A final technical report of findings summarizing the results of the mitigation program shall be prepared by the paleontologist. The report shall be prepared in accordance with SVP and museum repository requirements.

Human Remains

- A qualified archaeologist shall be retained by the project developer to monitor topsoil grading, to ensure that any buried archaeological deposit is not inadvertently disturbed without treatment.
- In the event that subsurface archaeological resources/human remains are encountered during the course of grading and/or excavation, all development shall temporarily cease in these areas until the archaeological resources are properly assessed and subsequent recommendations are determined by a qualified archaeologist. In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. These code provisions require notification of the County Coroner and the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. Excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent remains or archaeological resources.
- Copies of a subsequent archeological study or report, detailing the nature of any archaeological discovery, remedial actions taken, and disposition of any accessioned remains shall be submitted to the South Central Coastal Information Center at California State University, Fullerton.

GEOLOGY AND SOILS

Strong seismic ground shaking

- Prior to the issuance of building or grading permits, the project applicant shall submit a

<p>Geotechnical Report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety.</p> <ul style="list-style-type: none"> The Proposed Project shall be designed and built in accordance with City of Los Angeles Building Code construction requirements for habitable structures.
Seismic-related ground failure, including liquefaction
<ul style="list-style-type: none"> Prior to the issuance of building or grading permits, the project applicant shall submit a Geotechnical Report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The project shall implement the recommendations of the Geological and Soil Engineering Exploration Report for remedial grading and construction. The Proposed Project shall be designed and built in accordance with City of Los Angeles Building Code construction requirements for habitable structures.
Soil Erosion/ Loss of Topsoil
<ul style="list-style-type: none"> Prior to the issuance of building or grading permits, the project applicant shall submit a Geotechnical Report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The Proposed Project shall be designed and built in accordance with City of Los Angeles Building Code construction requirements for habitable structures. Implementation of standard City required erosion controls imposed during grading and via building permit regulations. All grading permits from the Department of Building and Safety include provisions to limit the erosion potential. Specifically, grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code which addresses grading, excavations, and fills. Application of Best Management Practices during site preparation, grading, site preparation and construction.
Expansive Soils
<ul style="list-style-type: none"> Prior to the issuance of building or grading permits, the project applicant shall submit a Geotechnical Report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. In accordance with Los Angeles City Building Permit requirements, the applicant shall submit a completed report of soil conditions at construction sites to identify, and recommend treatment for, potentially unsuitable soil conditions.
Unstable Geologic Unit
<ul style="list-style-type: none"> Prior to the issuance of building or grading permits, the project applicant shall submit a Geotechnical Report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The Proposed Project shall be designed and built in accordance with City of Los Angeles Building Code construction requirements for habitable structures. Implementation of standard City required erosion controls imposed during grading and via building permit regulations. All grading permits from the Department of Building and Safety include provisions to limit the erosion potential. Specifically, grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code which addresses grading, excavations, and fills.

- Application of Best Management Practices during site preparation, grading, site preparation and construction.
- Compliance with building foundation requirements appropriate to site conditions

HYDROLOGY AND WATER QUALITY

Violation of Water Quality Standards or Waste Discharge Requirements

- The project developer/construction contractor shall comply with the applicable provisions of Ordinance No. 172,176 and Ordinance No. 173,494 which specify the application of Best Management Practices (BMPs) to control stormwater and urban runoff pollution control.
- The project developer/construction contractor shall comply with Chapter IX, Division 70, of the Los Angeles Municipal Code which addresses grading, excavations, and fills.
- The project developer/construction contractor shall comply with the applicable requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board.
- The project applicant/developer shall implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24 hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be submitted to the City Engineer and the Los Angeles Regional Water Quality Control Board.
- The owner(s) of the Project Site shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer's instructions.
- Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate if the increased peak stormwater discharge rate shall result in increased potential for downstream erosion.

PUBLIC SERVICES

Fire Protection

- The project applicant shall install automatic sprinkler systems in each new home.
- Prior to approval, the Proposed Project shall submit a request to LADWP to determine whether the water pressure in the project area is sufficient. If water pressure is not sufficient, then upgrades to the existing infrastructure shall be required.
- The project shall be constructed according to California Fire Code requirements regarding length and width of roads and accesses as well as distance to and between fire hydrants.
- The plot plan for the Proposed Project shall be approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Schools

- Per State of California Government Code Section 65595, the developer shall be required to pay \$3.55 per square foot of new residential development to mitigate school overcrowding within the LAUSD service area. The required fee applies to all new development within the City of Los

Angeles and is considered sufficient mitigation for any impacts.
Recreation
<ul style="list-style-type: none">• Payment of Quimby fees to mitigate costs of maintenance of park and recreational facilities.
UTILITIES AND SERVICE SYSTEMS
Water or Wastewater Treatment Facilities
<ul style="list-style-type: none">• If water main or infrastructure upgrades are required the project developer shall pay for such upgrades.• The project shall incorporate the recommended water and energy conservation measures recommended by the Los Angeles Department of Water Power letter of November 19, 2004 (see Appendix D).

III. PROJECT DESCRIPTION

The purpose of this section is to describe the characteristics and objectives of the Proposed Project. The Project description below includes:

- the location and boundaries of the Project Site;
- a general description of the Project's technical and environmental characteristics;
- the Project Objectives and Discretionary Actions sought by the Project Applicant; and
- a brief statement regarding the intended uses of this Draft Environmental Impact Report (Draft EIR).

A. LOCATION AND BOUNDARIES

The 6.2-acre Project Site is located at 22241 and 22251 Mulholland Drive in the City of Los Angeles, within the community of Woodland Hills. The irregularly shaped Project Site is bound by San Feliciano Drive to the north and west and Mulholland Drive to the south and east. The Girard Reservoir (drained in 1989 and currently empty) is adjacent to and north of the Project Site.

Regional access is provided by the Ventura Freeway (US-101), the primary east-west arterial in this portion of the San Fernando Valley. The Ventura Freeway, located approximately one mile north of the Project Site, provides a continuous route north to Ventura County and eastward to the Hollywood Freeway where there is a transition to continue eastbound through Pasadena via State Highway 134 or southbound via the US-101 to Hollywood. For a generalized site location, see Figure III-1, Regional Map, and also Figure III-2, Vicinity Map. Figure III-3, Surrounding Vicinity, is an aerial photograph showing the Project Site in relationship to existing development in the area.

B. PROJECT CHARACTERISTICS

The Proposed Project is the urban infill subdivision of a 6.2-acre, irregularly shaped hillside property consisting of two parcels, to subdivide the site into 19 lots and subsequently develop 19 single-family homes. The proposed development is shown in Figure III-4, Site Plan.

General Project Features

Eighteen of the 19 proposed single-family homes in the Project would be developed according to one of three plans: A, B, or C. A total of 7 homes would be built to Plan A, 6 homes to Plan B, and 5 homes to Plan C. One additional home would be built to a unique plan. Each unit would have three or four bedrooms and would have a maximum height of three stories or 36 feet, as established by the Mulholland Scenic Parkway Specific Plan Inner Corridor regulations. Each unit would include a two-car garage.

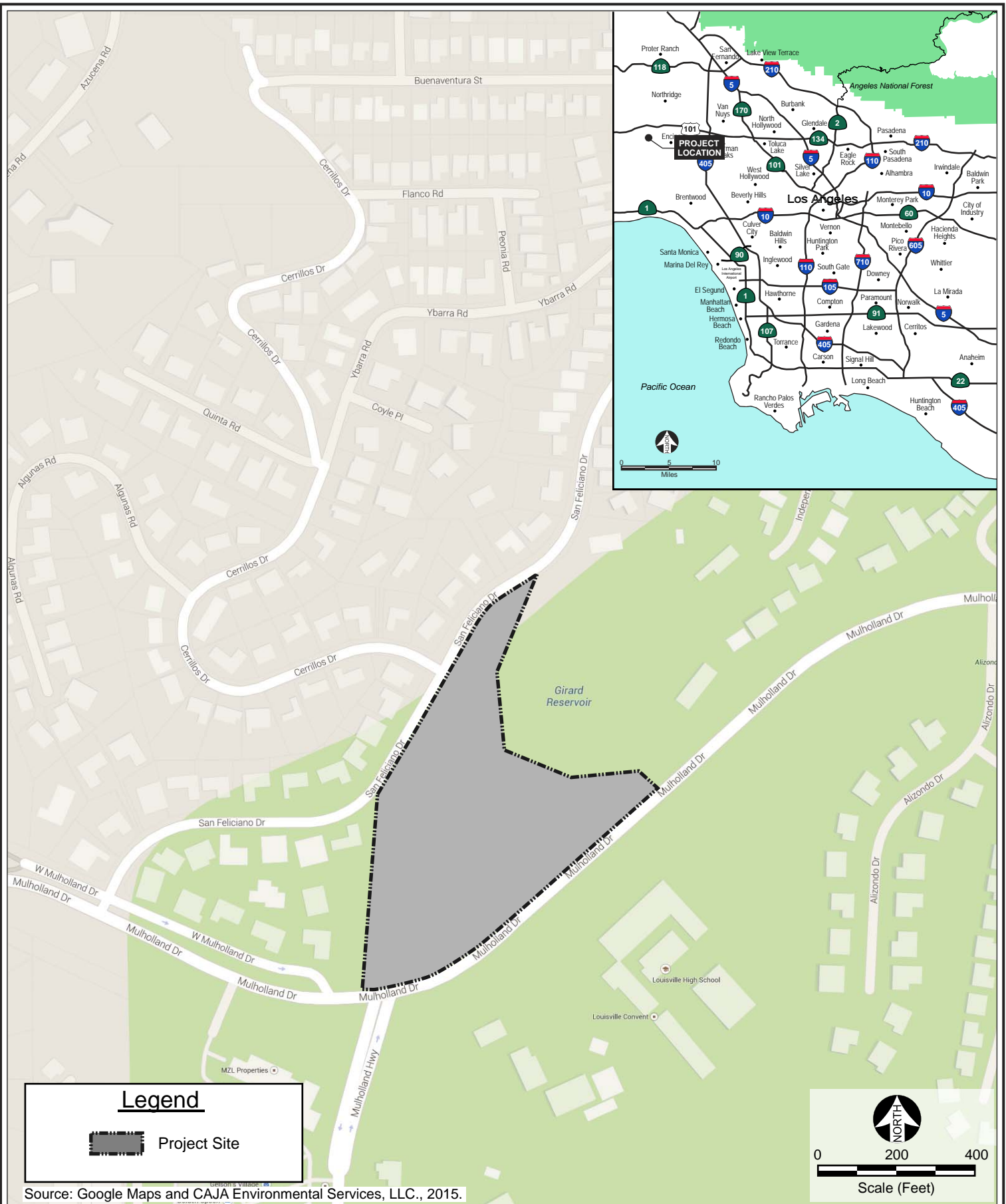
There would be no basements, subterranean floors and no stepped pads. The architectural style for the Project has not yet been determined; nor have floor plans, elevations, or renderings yet been developed. Table III-1 provides a summary of the 19 proposed single-family home lots.

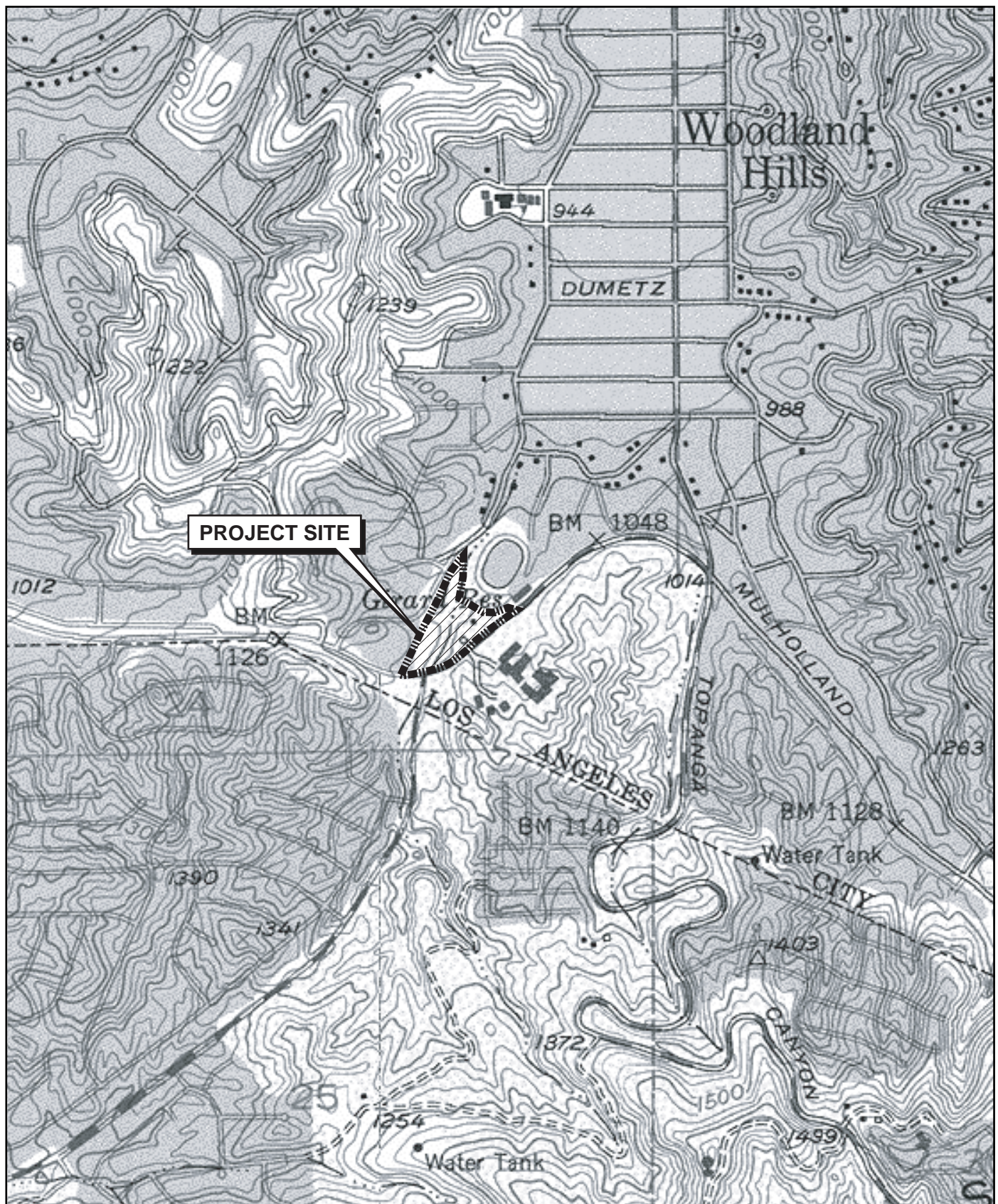
**Table III-1
Proposed Lot Summary**

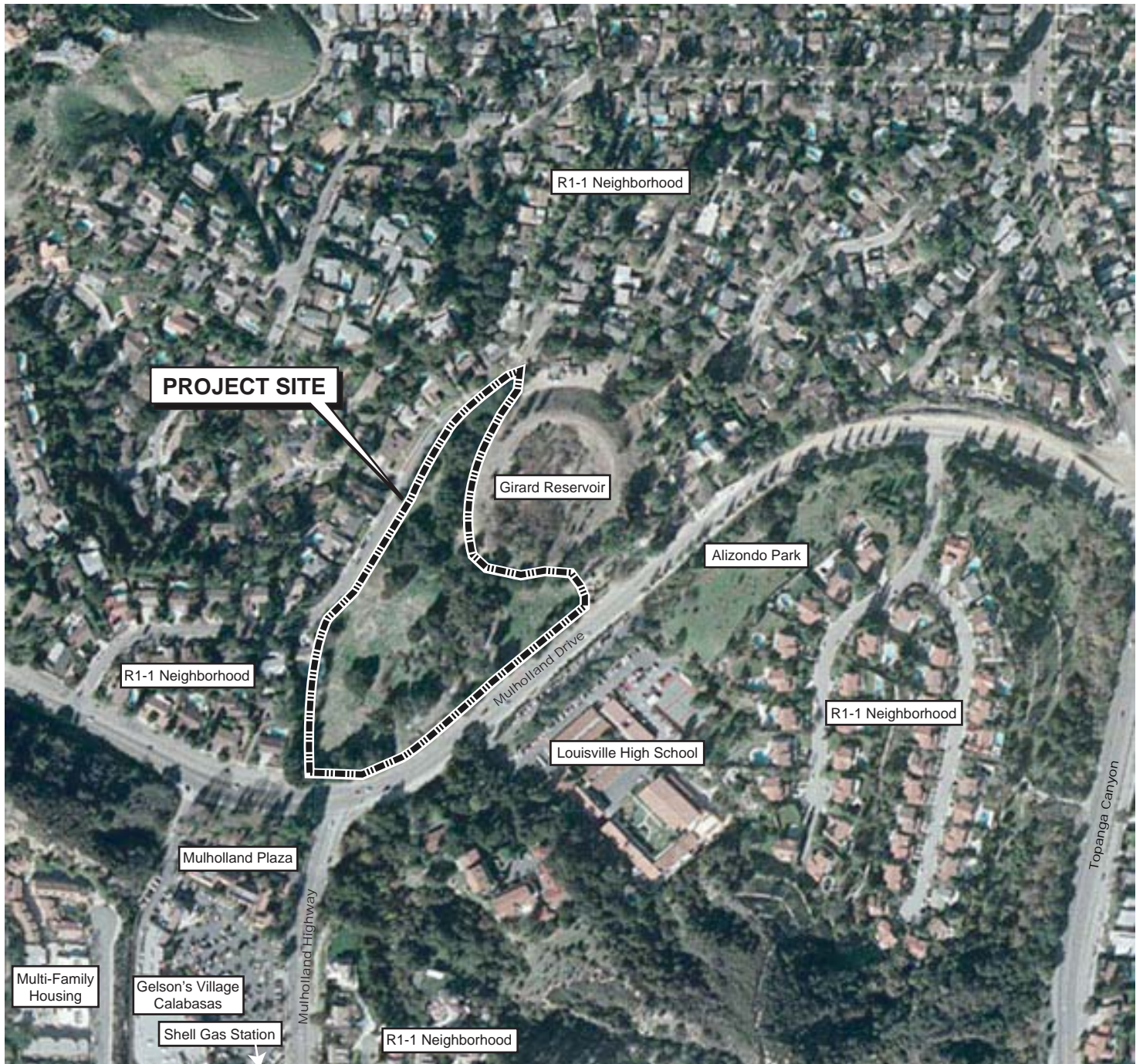
Lot No.	Lot Area		Pad Area		Plan Type/Lot Access Point
	Square Feet	Acres	Square Feet	Acres	
1	10,695	0.25	1,645	0.04	A/Shared Private Driveway from Mulholland Drive
2	10,147	0.23	1,645	0.04	A/Shared Private Driveway from Mulholland Drive
3	10,370	0.24	1,645	0.04	A/Shared Private Driveway from Mulholland Drive
4	15,300	0.35	1,645	0.04	A/Shared Private Driveway from Mulholland Drive
5	24,658	0.57	1,645	0.04	A/New Public Street
6	14,430	0.33	2,000	0.05	B/New Public Street
7	17,344	0.40	2,400	0.06	C/New Public Street
8	16,855	0.39	2,000	0.05	B/New Public Street
9	11,499	0.26	2,000	0.05	B/New Public Street
10	12,505	0.29	2,000	0.05	B/New Public Street
11	18,563	0.43	1,645	0.04	A/San Feliciano Drive
12	11,372	0.26	2,000	0.05	B/San Feliciano Drive
13	11,893	0.27	1,645	0.04	A/San Feliciano Drive
14	8,018	0.18	2,000	0.05	B/San Feliciano Drive
15	9,000	0.21	2,400	0.06	C/New Public Street
16	9,000	0.21	2,400	0.06	C/New Public Street
17	8,044	0.18	2,400	0.06	C/New Public Street
18	8,066	0.19	2,400	0.06	C/New Public Street
19	10,039	0.23	1,740	0.04	Specialized/New Public Street

Source: Harridge San Feliciano, LLC.

Of the Project Site's 6.2 acres of gross total area (269,857 square feet), building footprint coverage would account for approximately 0.86 acre (37,462 square feet or 13.8 percent of the total Project Site). Approximately 0.96 acre (41,861 square feet or 15.5 percent of the site) would be covered by other forms of impervious surfaces, including streets/driveways, patios, and walkways. A total area of approximately 1.35 acres (58,625 square feet or 21.7 percent of the site) would be covered with landscaping, all of it private property. In addition, there would be approximately 3.03 acres (132,116 square feet or 48.9 percent of the site) of the site remaining as undisturbed open space, all of it under private ownership. Table III-2 summarizes the Project area statistics.



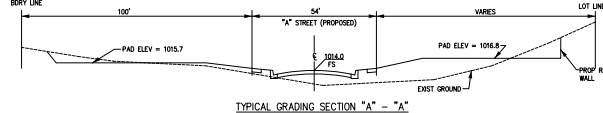
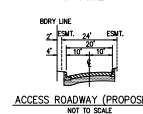
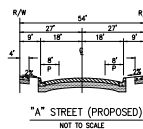
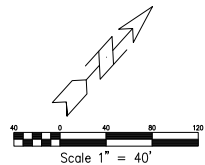




GRAPHIC SCALE: 1"=40'

	DELTA	RADIUS	LENGTH
1	84° 05'05"	78.00"	114.46"
2	84° 05'05"	105.00"	154.09"
3	84° 05'05"	132.00"	193.72"
4	12° 06'06"	127.00"	26.71"
5	12° 06'06"	100.00"	21.03"
6	12° 06'06"	73.00"	15.35"
7	12° 02'22"	175.00"	36.77"
8	12° 02'22"	148.00"	31.10"
9	84° 35'10"	40.00"	45.09"
10	233° 32'48"	44.00"	178.58"
11	25° 50'31"	25.00"	11.28"

UNIT COUNT
PLAN A = 7 EA
PLAN B = 6 EA
PLAN C = 5 EA
SPEC HOME (LOT 19) = 1 EA



1. **RECORD OWNER:** SAN FELICIANO HOLDING COMPANY, LLC
112 N. SAN VICENTE BLVD., 3RD FLOOR
BEVERLY HILLS, CA 90211
(323) 658-1011
2. **SUBOWNER:** DO VENTURES, LLC
112 N. SAN VICENTE BLVD., 3RD FLOOR
BEVERLY HILLS, CA 90211
(323) 658-1011
3. **ENGINEER:**
4. **PROJECT ADDRESS:** 22255 MULHOLLAND DRIVE, WOODLAND HILLS, CA. 91364
5. **GROSS SITE AREA:** 29,847 SQ FT (0.68 ACRES)
NET SITE AREA: 23,796 SQ FT (0.549 ACRES)
6. **PROPOSED DEVELOPMENT AREA:** 19 SINGLE FAMILY RESIDENTIAL DWELLING
UNITS WITH 38 PARKING SPACES.
7. **EXISTING ZONE:** R-1
8. **PROPOSED ZONE:** R-1
9. **DISTRICT MAP:** 665 B 101
10. **COMMUNITY PLANNING AREA:** CANGCA PARK - WINNETKA
WOODLAND HILLS - WEST HILLS
11. **COUNCIL DISTRICT:** COUNCIL DISTRICT 3
12. **APN:** 2076-023-019
13. **THOMAS GUIDE:** LA 559-5
14. **FLOOD ZONE:** NOT IN A FLOOD ZONE
15. **CONTOUR INTERVAL:** 1 FT
16. **STREET DESCRIPTION:** MULHOLLAND DRIVE - MAJOR HIGHWAY
SAN FELICIANO DRIVE - COLLECTOR
17. **THERE ARE PROTECTED TREES ON SITE. SEE TREE REPORT FOR TREES TO BE REMOVED**
IN SAN FELICIANO DRIVE
18. **THIS PROPERTY IS LOCATED IN THE MOUNTAIN & FIRE DISTRICT, HILLSIDE AND
LIQUORATION AREAS.**
19. **THERE ARE NO POTENTIAL HAZARDOUS AREAS ON SITE.**
20. **PROPOSED SEWAGE DISPOSAL:** TO EXISTING SANITARY SEWER LOCATED IN
SAN FELICIANO DRIVE
21. **THE PROJECT IS LOCATED IN THE MULHOLLAND SCIZING PARKWAY SPECIFIC PLANNING AREA**

LOT No.	LOT AREA		PAID AREA		ACRES
	SQ. FT.	SQ. FT.	SQ. FT.	SQ. FT.	
1	10,695	0.25	1,645	0.04	
2	10,147	0.23	1,645	0.04	
3	10,300	0.24	1,645	0.04	
4	15,300	0.35	1,645	0.04	
5	24,658	0.57	1,645	0.04	
6	14,430	0.33	2,000	0.05	
7	17,344	0.40	2,400	0.06	
8	16,855	0.39	2,000	0.05	
9	11,499	0.26	2,000	0.05	
10	12,660	0.29	2,000	0.05	
11	15,563	0.36	1,645	0.04	
12	11,372	0.26	2,000	0.05	
13	11,893	0.27	1,645	0.04	
14	8,018	0.18	2,000	0.05	
15	9,000	0.21	2,400	0.06	
16	9,000	0.21	2,400	0.06	
17	9,244	0.21	2,400	0.06	
18	10,666	0.19	2,400	0.06	
19	10,039	0.23	1,740	0.04	
TOTAL	237,798	5.48	37,255	0.86	

**Table III-2
Project Area Summary**

Component	Square Footage	Percentage of Gross Site Area
Building Footprint Coverage	37,255 sq. ft.	13.8%
Other Paved Surfaces	41,861 sq. ft.	15.5%
Landscape Areas	58,625 sq. ft.	21.7%
Open Space	132,116 sq. ft.	48.9%
TOTAL:	269,857 sq. ft.	100%

Landscape Plan

The landscape plan is proposed to meet several purposes: (1) to fulfill the requirements of the Mulholland Scenic Parkway Specific Plan and Design and Preservation Guidelines, (2) to preserve and enhance the unique character and scenic features of the Mulholland Scenic Parkway, and (3) to fill the existing gaps in the vegetation along Mulholland Drive in order to block views of the proposed homes. The preliminary plan consists of street trees (24-inch boxes) in the lawn parkway; large canopy accent trees (24-inch and 36-inch boxes); parkway accent trees and front yard flowering trees (15-gallon and 24-inch boxes); vertical evergreen screen trees (15-gallon and 24-inch boxes); shrubs (1-gallon, 5-gallon and 15-gallon size); vines (typically 5-gallon); and ground cover (from rooted cuttings). It is estimated that most of the plantings will mature in approximately five years.

Parking

In compliance with the standard parking requirements of the Los Angeles Municipal Code (LAMC), the Project would be providing two covered parking spaces per dwelling unit, for a total of 38 covered parking spaces for the 19 single-family homes. Public parking on the proposed public street, plus spaces in private driveways would accommodate parking for guests and visitors. Therefore, no parking impacts would occur.

Street Lighting

All lighting would be designed to be consistent with the applicable Mulholland Scenic Parkway Specific Plan standards and policies. Street lighting on the new public street would be consistent with City standards. No street lighting would be provided on private driveways within the Project. Rather, the Project would use low intensity exterior lighting to minimize potential glare and night sky illumination. For example, low intensity carriage lights are proposed to be mounted on the exterior walls of the homes.

Site Grading

An estimated 3,040 cubic yards of soil would be excavated on the Project Site, with an estimated 7,240 cubic yards of soil needed for fill (total cut and fill = 10,280 cubic yards). Therefore, approximately 4,200 cubic yards of fill material would need to be imported to the Project Site in order to balance cut and fill during grading operations.

The Mulholland Scenic Parkway Specific Plan Inner Corridor regulations limit grading to one cubic yard per four square feet of total site area. In total, the Specific Plan regulations would permit 67,396 cubic yards of grading ($269,857 \div 4 = 67,396$) at the Project Site. The Project's proposed grading quantity would therefore be in compliance with the Specific Plan's grading requirements.

All manufactured slopes would have a maximum horizontal to vertical ratio of 2 to 1. The project would utilize retaining walls in lieu of slopes to preserve additional protected species trees on the Project Site. Three irregularly shaped retaining walls are proposed. The locations of the walls are shown on Figure III-4. The maximum height of the walls would be 10.5 feet, which would occur on Lot 10.

Access

Direct access to the Proposed Project homes would be from (i) a new public street to run from San Feliciano Drive into the site, providing access to 11 homes, and terminating in a cul-de-sac, (ii) direct driveways from San Feliciano Drive for four of the homes, and (iii) a private driveway from Mulholland Drive giving access to four other homes. The new public street would be approximately 54 feet wide (including sidewalks) and would not be gated. The Proposed Project layout is shown in Figure III-4.

Construction Schedule

Following City approvals and the issuance of building construction permits, it would take approximately 24 months of demolition, debris and vegetation removal, grading, and construction activities to complete the Project. Construction would commence with the demolition of the vacant two-story single-residence, shed and kennel. Building and paving rubble would be hauled away to an approved dumpsite. However, masonry and asphalt would be hauled to a recycling facility or used as necessary fill at most dumpsites. All debris, as well as vegetation within the development footprint not scheduled for retention, would be removed. Then the site will be graded for building pads and access; and the retaining walls constructed.

The staging for all construction equipment, materials, and construction-worker parking would be provided on-site.

Best Management Practices

As part of the Project, the following Best Management Practices (BMPs) would be implemented to reduce grading-related Project effects:

- Excavation and grading activities will be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes will be constructed to channel runoff around the site. Channels will be lined with grass or roughened pavement to reduce runoff velocity.
- Appropriate erosion control and drainage devices will be provided to the satisfaction of the Building and Safety Department. These devices may include interceptor terraces, berms, channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, and will include planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.
- Stockpiles and excavated soil will be covered with secured tarps or plastic sheeting.

In accordance with applicable regulations, the following BMPs would be implemented to reduce general construction-related effects of the Proposed Project:

- All construction waste would be disposed of properly. Appropriately labeled recycling bins will be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non-recyclable materials/wastes will be taken to an appropriate landfill. Toxic wastes will be discarded at a licensed regulated disposal site.
- Leaks, drips and spills will be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- Material spills on pavement will not be hosed down. Dry cleanup methods will be used whenever possible.
- Dumpsters will be covered and maintained. Uncovered dumpsters will be placed under a roof or covered with tarps or plastic sheeting.
- Where truck traffic is frequent, gravel approaches will be used to reduce soil compaction and limit the tracking of sediment into streets.
- All vehicle/equipment maintenance, repair, and washing will be conducted away from storm drains. All major vehicle repairs will be conducted off-site. Drip pans or drop clothes will be used to catch drips and spills.

The following BMPs would be implemented to reduce potential construction vehicle and pedestrian conflicts:

- The Project Applicant would install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- Fences would be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

In accordance with applicable regulations, the following BMPs would be implemented to reduce stormwater and urban runoff-related effects of the Project:

- The Project would concentrate or cluster development on portions of the Project Site while leaving the remaining land in a natural undisturbed condition.
- The Project would limit clearing and grading of native vegetation at the Project Site to the minimum needed to build lots, allow access, and provide fire protection.
- The Project would maximize trees and other vegetation at the site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.
- The Project would preserve riparian areas and wetlands.
- Cut and fill slopes would be planted and irrigated to prevent erosion, reduce run-off velocities and to provide long-term stabilization of soil.
- The Project would incorporate appropriate erosion control and drainage devices, such as interceptor terraces, berms, channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Outlets of culverts, conduits or channels will be protected from erosion by discharge velocities by installing rock outlet protection. Rock outlet protection is a physical device composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe. Sediment traps will be installed below the pipe outlet. All on-site outlet protection would be inspected, repaired and maintained after each significant rain.
- All connections to the sanitary sewer would have authorization from the Bureau of Sanitation.
- All storm drain inlets and catch basins within the Project area would be stenciled with prohibitive language (such as NO DUMPING - DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.
- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, would be posted at public access points along channels and creeks within the Project area.
- Legibility of stencils and signs would be maintained.

- Materials with the potential to contaminate stormwater would be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar structure that prevent contact with runoff spillage to the stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
- The storage area would be paved and sufficiently impervious to contain leaks and spills.
- The storage area would have a roof or awning to minimize collection of stormwater within the secondary containment area.
- Impervious surface area would be reduced by using permeable pavement materials where appropriate, including pervious concrete/asphalt; unit pavers; and granular materials such as crushed aggregates or cobbles.
- Roof runoff systems would be installed where suitable to enhance groundwater recharge and reduce excess runoff into storm drains.
- Efficient irrigation systems would be installed to minimize runoff including drip irrigation for shrubs to limit excessive spray, shutoff devices to prevent irrigation after significant precipitation, and flow reducers.
- Runoff from hillsides would be collected in a vegetative swale, wet pond, or extended detention basin before it reaches the storm drain system.

C. PROJECT OBJECTIVES

CEQA, as amended, requires that an EIR include a statement of objectives sought by a Proposed Project (Section 15124(b) of the *CEQA Guidelines*).

The development activity proposed within the Project Site is intended to provide housing opportunities within a mixed-use suburban community setting. The following represent the objectives of the Proposed Project:

- To create a new residential community of 19 single-family homes without displacing existing housing.
- To help alleviate the current housing shortage by providing infill residential development on underutilized land.
- To provide housing in close proximity to commercial areas and recreational areas.
- To design the on-site circulation system to help ensure safe ingress and egress to and from the Project Site for existing and future area residents, and other motorists.

- To design a project that is consistent with the predominant character of the style of the neighborhood and that connects with the surrounding suburban environment and reflects neighborhood and market needs.
- To design landscape features that provide natural character and texture within the neighborhood suburban environment; that enhance the visual character of the development.
- To allow development of the site while minimizing tree removal and landform alteration.

D. DISCRETIONARY ACTIONS

The City of Los Angeles (the City) is the lead agency for the Proposed Project. The Project Applicant is requesting approval of the following discretionary and ministerial actions from the City:

- **Vesting Tentative Tract Map No. 67505** – Pursuant to Los Angeles Municipal Code (LAMC) 17.00, the Applicant is requesting the approval of Vesting Tentative Tract Map (VTTM) No. 67505 to authorize a 19-unit detached single-family residential development on 19 parcels.
- **Protected Tree Removal/Relocation** – Pursuant to LAMC 17.05R, the Applicant is requesting the approval of VTTM No. 67505 to authorize a 19-unit detached single-family residential development on 19 parcels and Advisory Agency approval to remove a total of 15 protected trees.
- **Advisory Agency Approval** – Pursuant to LAMC 17.00, the Applicant is requesting the approval of a new 36-foot wide private street and cul-de-sac for access to 11 lots and the designation of San Feliciano Drive as the front yard for Lots 11-14 and the private street as the front yard for Lots 5-10 and 15-19.
- **Zoning Administrator Determination (ZAD)** – Pursuant to LAMC Sections 12.24 X7 and X26, the Applicant is requesting a ZAD regarding the number and height of retaining walls as follows:

For retaining walls in the front yard exceeding 3.5 feet in height

Pursuant to LAMC Section 12.24 X7, the Applicant is requesting a ZAD to permit a retaining wall exceeding 3.5 feet in height within the required front yard setback of Lot 13. LAMC Section 12.22 C 20(f) allows fences and walls not more than three and one-half feet in height within the required front yard in an R zone. A retaining wall 70 feet in length and one to eight feet in height is proposed to be located on Lot 13, with a portion of the wall located in the front yard setback.

For more than 1 retaining wall per lot

Pursuant to LAMC Section 12.24 X26, the Applicant requests a ZAD to allow more than one retaining wall per lot. The Project proposes six retaining walls with a total of 510 linear

feet. LAMC Section 12.21 C 8 requires a maximum of one retaining wall per lot with a maximum height of 12 feet or two retaining walls provided a minimum horizontal distance between walls of three feet and maximum wall heights of 10 feet. The Applicant is requesting this ZAD in order to begin grading and construction of the retaining walls prior to recordation of the final map. After recordation of the final map and subdivision into 19 lots, the Project will be consistent with the zoning code provisions, and no lot will have more than one retaining wall.

- **Mulholland Scenic Parkway Specific Plan (MSPSP)** – Pursuant to LAMC Section 11.5.7.C, project permit compliance, and, pursuant to LAMC Section 16.50, design review.
- **Haul Route Approval** – Pursuant to LAMC Section 17.05 L.
- Any other necessary discretionary or ministerial permits or approvals as may be required for the construction of the Proposed Project. Such approvals may include, but are not limited to landscaping, permit approvals for grading, approvals for foundations, retaining walls, and structural improvements; installation and hookup approvals for public utilities and related permits.

Implementation of the Proposed Project may also require discretionary approvals from the following responsible and/or regulatory agencies:

- South Coast Air Quality Management District
- Regional Water Quality Control Board
- City of Los Angeles Department of Public Works (traffic/water services)
- City of Los Angeles Department of Transportation

E. INTENDED USES OF EIR

This EIR will be used by the City of Los Angeles to assess the granting of approvals for the Vesting Tentative Tract Map, Retaining Wall Adjustment, Protected Tree Permit, and other required approvals, including Mulholland Scenic Parkway Specific Plan project permit compliance and design review, haul route approval, and design review. Subsequently, the Regional Water Quality Control Board, Los Angeles Region, may use the EIR in regard to the issuance of waste discharge permits, including NPDES permits and a Section 401 Water Quality Certification.

IV. ENVIRONMENTAL SETTING

A. OVERVIEW OF THE ENVIRONMENTAL SETTING

This section provides a brief overview of the Project Site's regional and local setting. Additional descriptions of the environmental setting as it relates to each of the environmental issues analyzed in this EIR are included in the environmental setting discussions contained within Section V (Environmental Impact Analysis). Also provided in this section is a list of cumulative development projects, which is used as the basis for the discussions of cumulative impacts throughout Section V (Environmental Impact Analysis).

Regional Setting

The 6.2-acre Project Site is within the community of Woodland Hills in the City of Los Angeles. As illustrated in Figure III-1, the Project Site is approximately one mile south of the Ventura Freeway (US-101), approximately 11 miles west of the San Diego Freeway (I-405) and approximately 25 miles northwest of downtown Los Angeles.

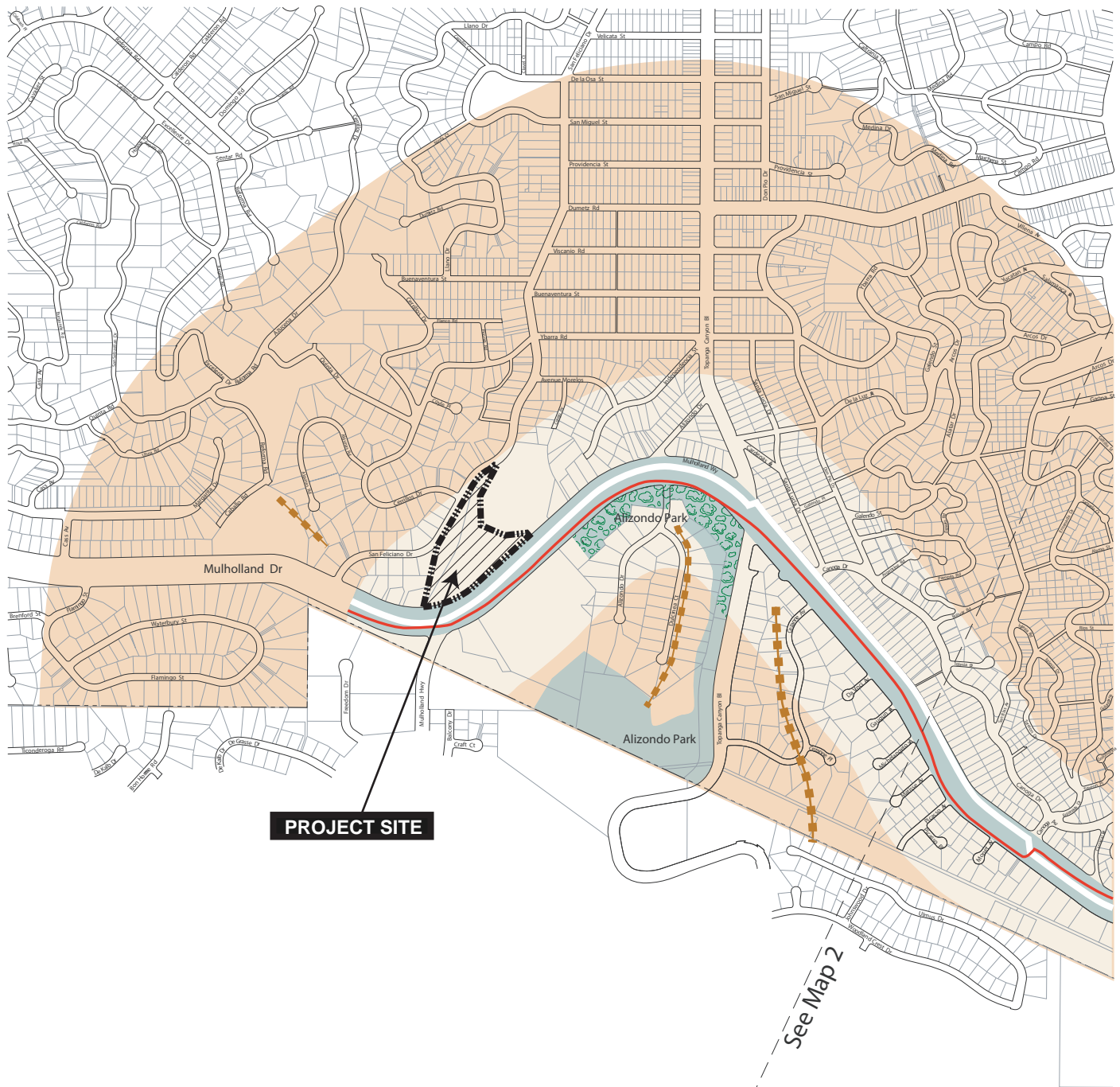
Project Site

The site is composed of two parcels located at 22241 and 22251 Mulholland Drive. The irregularly-shaped site is bounded by San Feliciano Drive to the west and north, Mulholland Drive to the south and east, Girard Reservoir to the northeast, and single-family residences to the west (see Figure IV-1, Existing Site Plan).

The Project Site is within the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area, which designates the site for Low Residential land uses. The site is currently zoned R1 for single-family residential development in the No. 1 Height District. As described in the Community Plan, the Project Site also lies within the Mulholland Scenic Parkway Specific Plan (Specific Plan) area, which is comprised of Mulholland Drive and the areas immediately adjacent to the Mulholland Drive right-of-way. The entire Project Site is located within 500 feet of the Mulholland Scenic Parkway right-of-way, which is referred to as the Inner Corridor (see Figure IV-2). The Specific Plan contains density requirements, building standards and grading restrictions that are applicable to the Inner Corridor. In addition, the Project Site is subject to the Specific Plan's accompanying design guidelines and review by the Mulholland Scenic Parkway Design Review Board. The Project Site is also within a Mountain Fire District and is subject to the Hillside Grading Ordinance.

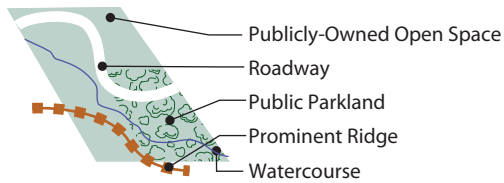


Source: Robert A.M. Stern Architects, October 12, 2005.



Legend

- Inner Corridor Overlay Zone
500' from Right-of-Way
- Outer Corridor Overlay Zone
500' to One-Half Mile from Right-of-Way
- Institutional Use Corridor



- Major Vista Point
- Core Trail
- Existing Trail, Fire, or Service Road
- Proposed Trail
- Organized Group Meeting Center
- Visitor's Center

Source: Mulholland Scenic Parkway Specific Plan; adopted May 13, 1992, City of Los Angeles.



A chain link fence surrounds the Project Site. A vacant two-story single-family residence, sheds, and an aged kennel occupy the site. These structures are located at the east-central portion of the property along Mulholland Drive. The house is visible from adjacent portions of Mulholland Drive; however, the house, sheds, and kennels are not visible from San Feliciano Drive. The remaining portion of land is undeveloped open space occupied by various trees, shrubs, low-lying weeds and grasses. As indicated in Table IV-1, there are a total of 199 trees on the Project Site, including Coast Live Oaks, Southern California black walnuts, Willows, Mexican Elderberry and a variety of ornamental trees. There are no National Register or California State Historic Resource properties, California Historical landmarks, California Points of Historic Interest, or City of Los Angeles Historic-Cultural Monuments on the Project Site.

Table IV-1
Site Tree Summary

Number of Trees	Common Name	Species Name
1	King Palm	Archontophoenix cunninghamiana
1	Bottle Tree	Brachychton populneus
1	Fig	Ficus carica
2	Modesto Ash	Fraxinus velutina 'Modesto'
11	Southern California Black Walnuts	Juglans californica
1	English Walnut	Juglans regia
1	Glossy Privet	Ligustrum lucidum
1	Apple	Malus sp.
2	Plums	Prunus sp.
155	Coast Live Oak	Quercus agrifolia
2	Willows	Salix sp.
6	Mexican Elderberry	Sambucus mexicana
3	California Peppers	Shinus molle
1	Brazilian Pepper	Shinus terebinthifolius
1	Chinese Elm	Ulmus parvifolia
10	Mexican Fan Palms	Washingtonia robusta
<i>Source: Revised Horticultural Tree Report, Proposed Residential Vesting Tentative Tract Map No. 67505, 22255 Mulholland Drive, Los Angeles CA 91364, revised September 21, 2009.</i>		

As the Project Site is located in the northern foothills of the Santa Monica Mountains, the topography of the site and the surrounding area is variable with elevation changes, although the general trend is of a decreasing slope while moving northward (see Figure II-3). The surface elevation on the irregularly-shaped site fluctuates, with the southwestern edge approximately 1,048 feet above mean sea level (msl), decreasing to approximately 1,000 feet above msl toward the northern edge of the site. The surface

elevations at the central and southeastern edge of the Project Site are approximately 1,015 and 1,020 msl, respectively. Table IV-2 summarizes the slope of existing site topography.

**Table IV-2
Existing Slope Analysis**

Slope Category	Square Footage	Percentage of Site Area
10% or Less	177,096 sq. ft.	65.6 %
10% - 15%	18,620 sq. ft.	6.9%
15% and Over	74,140 sq. ft.	27.5%

More specifically, the existing topography consists of a north-draining main ravine and a secondary ravine. A north-trending bedrock spur-ridge separates the main and easterly secondary canyon. The existing residential structure was built on the bedrock ridge. Minor cut and fill grading techniques were employed to create a level building site for the structure. Past grading, associated with the construction of Mulholland Drive, has consisted of placing fill where the roadway crosses the main and secondary canyons. Fill was also placed along the margins of the main canyon and within a secondary canyon to support residential development and San Feliciano Drive to the west. Placing fill within the main canyon created the now-abandoned Girard Reservoir. There is a 15-foot flood control easement that runs along the southwest property line, from Mulholland Drive to San Feliciano Drive.

Photographs of the Project Site are presented in Figures IV-4 and IV-5. Figure IV-3 is the Photograph Location Map.

B. LOCAL SETTING

The Project Site is located in the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area in City Council District 3. As shown in the aerial photograph (Figure III-3), the surrounding area is almost entirely developed with suburban uses. Properties to the north, east and west of the Project Site consist of one- and two-story single-family residences. These properties are all zoned R1-1 (Residential One-Family) with a Height District Designation of "1". The Girard Reservoir and the City of Los Angeles Department of Water and Power Pumping Station are located adjacent to and northeast of the site within the same R1-1 zone.

Land uses surrounding the 6.2-acre Project Site include one- and two-story single-family homes to the north, east, and west; the Girard Reservoir and the City of Los Angeles Department of Water and Power Pumping Station to the northeast; a private parochial high school and convent to the southeast; and a two-story commercial office building with a surface parking lot and a small shopping center to the southwest.

The City of Calabasas begins approximately 365 feet south of the Project Site, along Mulholland Highway. The private parochial high school (Louisville High School) and convent property houses multiple structures and contains a surface parking lot that parallels Mulholland Drive. The two-story commercial office building, Mulholland Plaza, is located at the southwest corner of the intersection between Mulholland Drive and Mulholland Highway. The Gelson's Village Calabasas shopping center is located in the jurisdiction of the City of Calabasas adjacent to Mulholland Plaza and consists of retail and commercial stores, including a Gelson's Supermarket, various restaurants, Chase Bank, and a dry cleaner. Adjacent to Gelson's Village Calabasas is a Shell gas station.

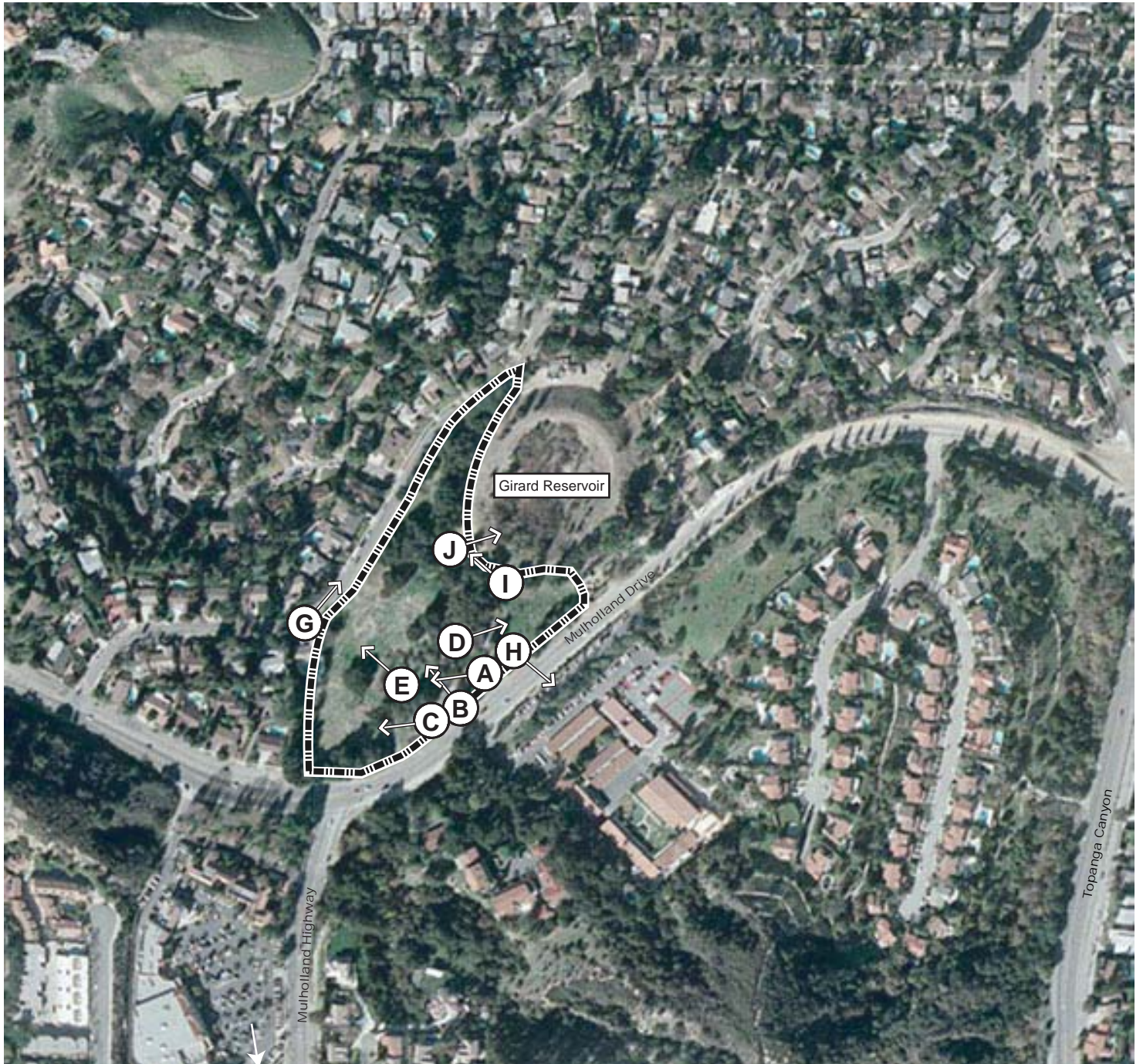
No surface water features or vegetation indicative of wetland areas (i.e., cattails and sedges) are found in the project area. Two State Highway System routes in the general vicinity have been deemed eligible for designation as a State Scenic Highway: State Route 27 (Topanga Canyon Boulevard) from the intersection with Mulholland Drive south to State Route 1 (Pacific Coast Highway) and U.S. Route 101 (Ventura Freeway) from the intersection with State Route 27 (Topanga Canyon Boulevard) north to the Ventura County line (and beyond).¹ Mulholland Drive in the vicinity of the Project Site is a designated Scenic Highway.

As discussed above, the Girard Reservoir, which was drained in approximately 1989 and currently remains empty, and the City of Los Angeles Department of Water and Power Pumping Station are located adjacent to and northeast of the Project Site. According to the Santa Monica Mountains Conservancy, there is some possibility that the Conservancy, the City Department of Recreation and Parks, or the Mountains Recreation and Conservation Authority (MRCA) could take over ownership and/or management of all but the northeastern one acre of the DWP's 5.91-acre Girard Reservoir property.²

Photographs E through J (Figures IV-6 through IV-8) present views of the area surrounding the Project Site.

¹ *California Scenic Highway Mapping System, State of California Department of Transportation, website <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>, accessed June 5, 2015.*

² *Correspondence from Elizabeth Cheadle, Chairperson, Santa Monica Mountains Conservancy to Jonathan Riker, City of Los Angeles Environmental Review Section, December 5, 2005*



Legend

-  Photo Location
-  Project Site





Photo A: Looking west from Mulholland Drive right-of-way at existing home and landscaping on Project Site.



Photo B: Looking southwest from within Project Site at a vacant residence.

Source: CAJA Environmental Services LLC, 2015.



Photo C: Looking northeast at a shed and kennel from within the Project Site near the southern property line.



Photo D: Looking southwest at the oak grove from within the Project Site near the vacant residence.

Source: CAJA Environmental Services LLC, 2015.



Photo E: Looking northwest at Project Site (foreground) and adjacent homes from near the southern property line.



Photo F: Looking southwest at the commercial office building at the southwest corner of Mulholland Highway and Mulholland Drive.

Source: CAJA Environmental Services LLC, 2015.



Photo G: Looking southeast along the Project Site to the right of San Feliciano.



Photo H: View of Louisville High School parking lot from the Project Site.

Source: CAJA Environmental Services LLC, 2015.



Photo I: Looking west at the LADWP Girard Reservoir access road from within the Project Site.



Photo J: Looking north from Project Site at Girard Reservoir, a raised earthen structure.

Source: CAJA Environmental Services LLC, 2015.

C. CUMULATIVE DEVELOPMENT PROJECTS

Section 15130 of the 2004 CEQA Guidelines stipulates that EIRs must consider the significant environmental effects of a Proposed Project as well as “cumulative impacts.” A cumulative impact is defined as an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts (CEQA Guidelines Section 15355). As stated in CEQA Guidelines Section 15130(a)(1), the cumulative impacts discussion in an EIR need not discuss impacts that do not result in part from the Proposed Project evaluated in the EIR. Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts [CEQA Guidelines Section 15130(b)(1)(A)].

All projects that are proposed (i.e., with pending applications), recently approved, under construction, or reasonably foreseeable that could produce a cumulative impact on the local environment when considered in conjunction with the Proposed Project are included in an EIR. These projects can include, if necessary, projects outside of the control of the lead agency. If a concise list of related projects is not available, cumulative impacts may be analyzed using the regional or area-wide growth projections contained in an adopted or certified general plan or related planning document.

For this Draft EIR, cumulative impact analyses are provided for each environmental issue discussed in Section V (Environmental Impact Analysis), and can be found in each respective subsection (e.g., Air Quality, Traffic, etc.). Through consultation with the City of Los Angeles Department of Transportation, the City of Calabasas, and the County of Los Angeles, one cumulative development project was identified within a 1.5-mile radius of the Project Site:

- Clarendon Street Apartments – 335 apartment units; 22055-22147 Clarendon Street, Woodland Hills; Case No. ENV-2015-1853-EIR; 1.3 miles from Project Site.

As a result, the cumulative impact analyses in this Draft EIR are based on a combination of a forecast of general growth within the areas of potential geographic extent of likely impacts and the above-listed cumulative development project.

V. ENVIRONMENTAL IMPACT ANALYSIS

A. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

In addition to the environmental impact categories analyzed in detail in this EIR, the City of Los Angeles has determined through the preparation of an Initial Study that the development and operation of the Proposed Project would not result in potentially significant impacts to the environmental concerns listed below. Therefore, no further review of these issues is necessary. The following discussion provides a summary of the Initial Study findings and is provided in accordance with CEQA Guidelines Section 15128 which states:

“An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an Initial Study.”

Although the Proposed Project will either have no impact or a less than significant impact on the environmental issues below, certain standard Conditions of Approval have been identified for implementation which will provide further assurance that any changes to the environment, with respect to these issues, will be less than significant. Conditions of Approval that are identified in the Initial Study (see Technical Appendix A) are listed in Table II-2 in Section II, Summary. These Conditions of Approval are reiterated in this section as Regulatory Compliance Measures or Mitigation Measures.

Agricultural and Forestry Resources

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?

According to the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. No farmland or agricultural activity exists on or in the vicinity of the Project Site. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Project Site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California. The Project Site

is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.¹ Therefore, the Project would have no impact on the conversion of farmland to non-agricultural uses.

Conflict with existing zoning for agricultural use or a Williamson Act contract?

According to the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.² The Project Site does not contain any State-designated agricultural lands or open space. Thus, the Project Site is not subject to a Williamson Act Contract and no conversion would occur.

Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 122220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC. The Project Site is currently zoned R-1-1 and has a land use designation of Low Residential in the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan. Neither the Project Site nor the surrounding parcels are zoned for forestland or timberland, and there is no timber production at the Project Site. Therefore, no impact related to loss or conversion of forestland or timberland would occur.

Result in the loss of forest land or conversion of forest land to non-forest use?

The Project Site does not contain forest land and implementation of the Proposed Project would not result in the conversion of forest land to non-forest use.

Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

According to the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project results in the conversion of farmland to another non-agricultural use. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses and, as discussed above, the Project Site is not

¹ State of California Department of Conservation, *Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map*, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf>, accessed June 2015.

² State of California Department of Conservation, *Williamson Act Program*, website: <http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx>, June 2015.

classified in any “Farmland” category designated by the State of California. According to the City General Plan Conservation Element, the Project Site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). No impacts related to the conversion of farmland to a non-agricultural use, or conversion of forestland to a non-forest use would occur as a result of the Project.

Cultural Resources

Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources that presently exist within the project site. Section 15064.5 of the State CEQA Guidelines defines an historical resource as:

- 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;
- 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or
- 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency’s determination is supported by substantial evidence in light of the whole record.

A project-related significant adverse effect would occur if the Proposed Project were to adversely affect a historical resource meeting one of the above definitions.

The State Office of Historic Preservation recommends that properties over 45 years of age be evaluated for their potential as historic resources. The structure on the Project Site (a vacant single-family home) is over 45 years old. However, the structure is not listed on any historical register and does not possess any distinctive characteristics pertaining to the region, a method of construction, or design, and is therefore unlikely to be eligible for inclusion in any historical register.

No Los Angeles Historic Cultural Monuments (LA HCM) are located within a one-half mile radius of the Project Site. Therefore, no LA HCMs would be impacted by the Proposed Project.

The Project Site is not listed in any register of historical resources, nor does the site contain any structures with distinctive characteristics of a region, period or construction method. The site does not meet any

criteria set forth in the California Environmental Quality Act (CEQA) to identify the site as a historical resource. Therefore, no impact is anticipated to result from the Proposed Project.

Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources that presently exist within the project site. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that met the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if the Proposed Project were to affect archaeological resources that fall under either of these categories. According to the South Central Coastal Information Center (letter included in Appendix D to this Draft EIR), there are no known archaeological resources within the Project Site.³ However, a recorded archaeological site is located within the Project vicinity, approximately 400 feet to the south of the Project Site.

A Phase I Archaeological Survey of the Project Site was conducted by W&S Consultants, Inc. in 2004. This report is included as Appendix K to this Draft EIR. The Phase I survey concluded that no evidence of archaeological sites of any kind was found on the Project Site. However, the Project Site is archaeologically sensitive. With adherence to the regulatory compliance measure listed below to ensure that any potential archaeological resources discovered on the site are not disturbed or destroyed, impacts would be less than significant.

Regulatory Compliance Measures

- A-1** If any archaeological materials are encountered during the course of Project development, all further development activity shall be halted in the area of the discovery and:
- a. The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center located at California State University Fullerton, or a member of the Society of Professional Archaeologists (SOPA), or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact.
 - b. The archaeologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.

³ South Central Coastal Information Center, California State University, Fullerton, letter dated June 1, 2015, included as Appendix D to this Draft EIR.

- c. The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.
- d. Project development activities may resume once copies of the archaeological survey, study, or report are submitted to the South Central Coastal Information Center at California State University Fullerton.
- e. Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- f. A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project were to disturb paleontological resources or geologic features which presently exist within the project site. According to the Natural History Museum of Los Angeles County (letter included in Appendix D to this Draft EIR), there are no known paleontological resources within the Project Site.⁴ However, known paleontological resources have been found in the general vicinity.

According to the Paleontologic Resource Evaluation conducted for the Project Site (included as Appendix L to this Draft EIR), excavations during construction are unlikely to uncover significant vertebrate fossils. However, the Project Site is considered paleontologically sensitive. Adherence to the regulatory compliance measure and mitigation measures listed below will ensure that potential paleontological resources discovered on the site are not disturbed or destroyed; therefore, impacts would be less than significant.

Regulatory Compliance Measures

A-2 If any paleontological materials are encountered during the course of Project development, all further development activities shall be halted in the area of the discovery and:

- a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology – USC, UCLA, California State University Los Angeles, California State

⁴ *Natural History Museum of Los Angeles County, letter dated May 28, 2015, included in Appendix D to this Draft EIR.*

University Long Beach, or the Los Angeles County Natural History Museum – who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact.

- b. The paleontologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- c. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report.
- d. Project development activities may resume once copies of the paleontological survey, study, or report are submitted to the Los Angeles County Natural History Museum.
- e. Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.
- f. A covenant and agreement binding the applicant to this condition shall be recorded prior to the issuance of a grading permit.

Mitigation Measures

- A-3** Prior to construction, the services of a qualified vertebrate paleontologist approved by the Los Angeles County Vertebrate Paleontology Department (LACM) and the City of Los Angeles shall be retained to implement a mitigation program during earth-moving activities associated with development of the parcel.
- A-4** The paleontologist shall develop a formal agreement with a recognized museum repository, such as the LACM, regarding the final disposition and permanent storage and maintenance of any fossil remains, as well as the archiving of associated specimen data and corresponding geologic and geographic site data, that might be recovered as a result of the mitigation program, and the level of treatment (preparation, identification, curation, cataloguing) of the remains that would be required before the entire mitigation program fossil collection would be accepted by the repository for storage.
- A-5** Earth-moving activities (particularly grading and trenching for pipelines) shall be monitored by a paleontologic construction monitor. Monitoring shall include the inspection of fresh exposures created by grading of the unnamed marine shale and in the younger alluvium to allow for the recovery of larger fossil remains. Monitoring will be conducted on a full-time basis in areas underlain by the marine shale, and a half-time basis once trenching has reached a depth 5 feet below previous grade in areas underlain by younger alluvium. As soon as practicable, the monitor shall recover all vertebrate fossil specimens, a representative sample of invertebrate or

plant fossils, or any fossiliferous rock or sediment sample that can be recovered easily. As warranted, fossiliferous sediment samples shall be recovered from the younger alluvium and processed to allow for the recovery of smaller fossil remains (total weight of samples will not exceed 6,000 pounds). The location and proper geologic context of any fossil occurrence or sampling site shall be documented, as necessary. The monitor shall have the authority to divert grading temporarily around a fossil site until the fossil remains have been evaluated and, if warranted, the remains and/or a fossiliferous rock or sediment sample have been recovered.

A-6 All fossil specimens recovered from the Project Site as a result of the mitigation program, including those recovered as the result of processing fossiliferous sediment samples, will be treated (prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. As appropriate, a sample of the marine shale will be submitted to a commercial laboratory for microfossil analysis; a sample of fossilized bone, shell, or wood from the younger alluvium will be submitted for carbon-14 dating analysis; and/or a sample of the alluvium will be submitted for pollen analysis.

A-7 The monitor shall maintain daily monitoring logs that include the location where monitoring was conducted, the rock unit encountered, fossil specimens or samples recovered, and associated specimen or sample data and corresponding geologic and geographic site data. A final technical report of findings summarizing the results of the mitigation program shall be prepared by the paleontologist. The report shall be prepared in accordance with SVP and museum repository requirements.

Disturb any human remains, including those interred outside of formal cemeteries.

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb previously interred human remains. The Project Site is located in a suburban area. The likelihood of encountering human remains on the site is minimal. According to the Native American Heritage Commission (letter included in Appendix B to this Draft EIR), the Sacred Lands File search did not indicate the presence of any resources within the Project Site.⁵ However, during the construction work and excavation of the Project Site, there is a possibility that human remains could be encountered. Implementation of the following standard City regulatory compliance measure would ensure that impacts with respect to human remains are less than significant.

Regulatory Compliance Measures

⁵ Native American Heritage Commission, *Sacred Lands File Search*, letter dated December 1, 2005, included in Appendix B to this Draft EIR.

- A-8** In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
- a. Stop immediately and contact the County Coroner.
 - b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the coroner has 24 hours to notify the Native American Heritage Commission.
 - c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendant of the deceased Native American.
 - d. The most likely descendant has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
 - e. If the descendant does not make recommendations within 48 hours, the owner shall reinter the remains in an area of the property secure from further disturbance.
 - f. If the owner does not accept the descendant's recommendations, the owner or the descendant may request mediation by the Native American Heritage Commission.

Geology/Soils

Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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?

There are no known active faults within close proximity to the Project Site and none of the City-designated Fault Rupture Study Zones or State-designated Alquist-Priolo Earthquake Fault Zones cross the Project Site. Therefore impacts would remain less than significant.

Strong seismic ground shaking?

Potential impacts from seismic ground shaking are present throughout southern California and would not be higher at the Project Site than for most of the City of Los Angeles or elsewhere in the region. Proposed Project construction in accordance with the City of Los Angeles Building Code requirements

would ensure that impacts would remain less than significant. The following regulatory compliance measures shall be implemented:

Regulatory Compliance Measures

- A-9** Prior to the issuance of building or grading permits, the Project Applicant shall submit a Geotechnical Report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety.
- A-10** The Proposed Project shall be designed and built in accordance with City of Los Angeles Building Code construction requirements for habitable structures.

Seismic-related ground failure, including liquefaction?

According to the Geological and Soil Engineering Exploration Report prepared by the J. Byer Group, Inc. for the Proposed Project (attached as Appendix M to this Draft EIR), the liquefaction potential across the Project Site is variable because of the inter-fingering nature of the clayey and sandy alluvium by which the site is underlain. The highest liquefaction potential is located near the center of the site. However, the Geological and Soil Engineering Exploration Report indicates that the Proposed Project is feasible from a geologic and soils engineering standpoint provided the recommendations for remedial grading and construction are implemented during construction. Project construction in accordance with Regulatory Compliance Measures A-9 and A-10 would ensure that impacts would remain less than significant.

Landslides?

The Project Site is not in a landslide inventory area. Therefore, no impacts from seismically induced landslides are expected to occur as a result of the Proposed Project.

Result in substantial soil erosion or the loss of topsoil?

All grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills. Therefore, with implementation of the standard City required erosion controls imposed during grading and via building permit regulations, and the application of Best Management Practices, impacts would remain less than significant. The following regulatory compliance measures shall be implemented:

Regulatory Compliance Measures

- A-11** Implementation of standard City required erosion controls imposed during grading and via building permit regulations. All grading permits from the Department of Building and Safety include provisions to limit the erosion potential. Specifically, grading and site preparation must

comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code which addresses grading, excavations, and fills.

- A-12** Application of required erosion control Best Management Practices during site preparation, grading, and construction.

Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

With the Proposed Project's construction in accordance with the City of Los Angeles Building Code requirements, no impacts are anticipated to occur as a result of project development. The following regulatory compliance measure shall be implemented:

Regulatory Compliance Measures

- A-13** The Project shall comply with all applicable building foundation requirements appropriate to site conditions.

Be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

According to the Geological and Soil Engineering Exploration Report prepared by the J. Byer Group, Inc. (see Appendix M), some earth materials on-site have some expansion potential, which would be adequately addressed by the foundation recommendations provided in the Geotechnical Report. As part of the construction permitting process, the City requires completed reports of soil conditions at construction sites to identify, and recommend treatment for, potentially unsuitable soil conditions. Therefore, impacts related to expansive soil conditions would be considered less than significant. The following regulatory compliance measure shall be implemented:

Regulatory Compliance Measures

- A-14** In accordance with Los Angeles City Building Permit requirements, the Project Applicant will submit a completed report of soil conditions at construction sites to identify, and recommend treatment for, potentially unsuitable soil conditions.

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 septic tanks or alternative disposal systems are necessary, nor are they proposed. No impact would occur.

Hydrology/Water Quality***Violate any water quality standards or waste discharge requirements?***

The Proposed Project must meet the requirements of the City's Low Impact Development (LID) Ordinance and/or Standard Urban Stormwater Mitigation Plan (SUSMP) as approved by the Los Angeles Regional Water Quality Control Board. Thus, with incorporation of BMPs, the Proposed Project would result in a less than significant water quality impact. The following regulatory compliance measures shall be implemented:

Regulatory Compliance Measures

- A-15** The Project Applicant or construction contractor shall comply with the applicable provisions of Ordinances No. 181,899, 172,176, and 173,494, which specify the application of Best Management Practices (BMPs) to control stormwater and urban runoff pollution control.
- A-16** The Project Applicant or construction contractor shall comply with the applicable requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board.
- A-17** The Project Applicant shall implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be submitted to the City Engineer and the Los Angeles Regional Water Quality Control Board.
- A-18** The owner(s) of the Project Site shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer's instructions.
- A-19** Post-development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate if the increased peak stormwater discharge rate will result in increased potential for downstream erosion.

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

The Project Site is not designated for groundwater recharge and the Proposed Project does not involve any groundwater extraction for wells or dewatering for subterranean construction. Therefore, the Proposed Project would not deplete groundwater supplies, and no impact would occur.

Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

The Project Site is located in a primarily suburbanized area, and no stream or river courses are located in the immediate project vicinity. The Proposed Project would result in an improved site that would convey runoff via streets into the storm drain system, and no impacts would occur.

Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Currently, the existing largely unimproved Project Site drains northeasterly into the abandoned Department of Water and Power Girard Reservoir, which carries off-site drainage into the San Feliciano storm drain. The Proposed Project would result in an improved site that would convey runoff via streets into the same storm drain system, and no impacts are anticipated to occur.

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?

The Proposed Project would not substantially increase stormwater runoff from the Project Site above existing levels or provide additional sources of polluted runoff to the storm drain system. Currently, the existing largely unimproved Project Site drains northeasterly into the abandoned Department of Water and Power Girard Reservoir, which carries off-site drainage into the San Feliciano storm drain. The Proposed Project would result in an improved site that would convey runoff via streets into the same storm drain system, and impacts would be less than significant.

Otherwise substantially degrade water quality?

Development of the Proposed Project would result in approximately 1.82 acres or 29.3 percent coverage of the site by impervious surfaces (e.g., structures and paved surfaces). As is detailed in the hydrology study prepared for the Project Site (included in Appendix E to this Draft EIR), with additional impervious surfaces, there would be a maximum 0.96 cubic feet per second (cfs) net increase in runoff during the 25-year return interval storm event with development of the site. As these impervious surfaces would be exposed to the elements, minimal amounts of polluted runoff could also be created. However, required compliance with the City's LID Ordinance and Standard Urban Storm Water Mitigation Plan (included as

Regulatory Compliance Measures A-15 through A-19, above) would prevent a substantial adverse effect to surface water quality and impacts would remain less than significant.

Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The Project Site is not in an area designated as a 100-year flood hazard area. According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 0601370041C, the Project Site is located within Zone C, which includes areas of minimal flooding. Therefore, no impact would occur.

Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The Project Site is not in an area designated as a 100-year flood hazard area. The Proposed Project is located in a suburbanized area and would not have the potential to impede or redirect floodwater flows. Therefore, no impact would occur.

Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

The Proposed Project does not lie in a potential inundation area or a potentially affected-by-tsunami area. Flooding from other sources is also not expected. Therefore, this impact is considered less than significant.

Expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow?

The Project Site is not subject to a risk of flooding from inundation by seiche or tsunami or subject to significant risk involving mudflow. This impact would be considered less than significant.

Mineral Resources

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?

A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the

permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The State Mining and Reclamation Act of 1975 (SMARA) requires that the State Mining and Geology Board (SMGB) map areas throughout the State of California that contain regionally significant mineral resources. Aggregate mineral resources within the state are classified by the SMGB through application of the Mineral Resource Zone (MRZ) system. The MRZ system is used to map all mineral commodities within identified jurisdictional boundaries. The MRZ system classifies lands that contain mineral deposits and identifies the presence or absence of substantial sand and gravel deposits and crushed rock source areas (i.e., commodities used as, or in the production of, construction materials). The Project Site is located within an area classified as MRZ-1, defined as areas where adequate information indicates that no significant mineral deposits are present, or likely to be present.

No oil extraction or mineral extraction activities have historically occurred or are presently conducted on the Project Site, therefore no adverse impacts would occur.

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?

A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is located within a Mineral Resource Zone 1 (MRZ-1) Area.⁶ The Project Site is not designated as a locally important mineral resource recovery site delineated on the Los Angeles General Plan, a specific plan, or other land use plan. Should any future mineral resource be discovered on or near the Project Site, development of the Project would not preclude the mineral's extraction, nor would it alter the potential utility of any minerals located beneath the site. Therefore, no impact associated with the loss of availability of a locally important mineral resource recovery site would occur.

Population/Housing

Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

⁶ City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles*, September 1996.

The Proposed Project can be expected to generate a total resident population of 51 persons with development of all 19 single-family detached homes. This would not represent substantial population growth within the SCAG Subregion nor the Planning Area and represents a less than significant impact.

Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

The Project Site is currently developed with one unoccupied single-family residence that will be demolished as part of Proposed Project development. The removal of this residence would not constitute the displacement of substantial numbers of existing housing and no impact would occur.

Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

There is one vacant residence on the Project Site. Therefore, no impact would occur.

Public Services

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

Fire protection?

The Proposed Project would not generate the need, or cause the construction of new or expanded fire protection facilities. Further, the Proposed Project would be constructed according to California Fire Code requirements regarding length and width of roads and accesses as well as distance to and between fire hydrants. With the installation of mandatory sprinkler systems, impacts associated with fire protection services would be considered less than significant. The following regulatory compliance measures shall be implemented:

Regulatory Compliance Measures

A-20 Automatic sprinkler systems shall be installed in all Proposed Project homes.

A-21 Prior to Proposed Project approval, the Project Applicant shall submit a request to LADWP to determine whether the fire flow in the Proposed Project area is sufficient. If fire flow is determined insufficient, then upgrades to the existing infrastructure would be necessary and would be the responsibility of the Project Applicant, subject to approval by the LADWP and LAFD.

- A-22** The Proposed Project shall be constructed according to California Fire Code requirements regarding length and width of roads and accesses as well as distance to and between fire hydrants.
- A-23** The plot plan for the Proposed Project shall be approved by the Los Angeles Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan will include the following minimum design features: fire lanes, where required, will be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room will not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Police protection?

The Proposed Project's estimated addition of 51 residents is not expected to materially increase the ratio of officers to residents in the West Valley Community Police Station service area and generate the need for, or cause the construction of new or expanded law enforcement facilities. In response to the NOP, the City of Los Angeles Police Department suggested that the Proposed Project would not have a significant impact on police protection services in the West Valley area. Consequently, impacts to police protection services are anticipated to be less than significant.

Schools?

The Proposed Project is estimated to generate 3 elementary school, 1 middle school, and 2 high school students, based on student generation rates published by the Los Angeles Unified School District (LAUSD). Current school capacity data provided by the LAUSD indicates that the three public schools that would serve the Project have sufficient capacity to accommodate the Project's projected students.⁷

With payment of the mandatory school developer fees, any impact to school services resulting from the development of the 19 single-family homes would be less than significant. The following regulatory compliance measure shall be implemented:

Regulatory Compliance Measures

- A-24** Per State of California Government Code Section 65595, the Project Applicant will be required to pay the applicable developer fee to reduce school overcrowding within the LAUSD service area. The required fee applies to all new development within the City of Los Angeles and is considered sufficient mitigation for any impacts.

⁷ Correspondence from Rena Perez, Director, Master Planning and Demographics, LAUSD Facilities Services Division, dated May 18, 2015 (included in Appendix D).

Other public facilities?

The development of 19 single-family detached homes would result in an incremental increase in the number of residents that would require minimal additional library services, but would not require the construction of new library facilities. According to the Los Angeles Public Library (LAPL), existing library service levels at the two libraries that would serve the Project area are considered adequate and there are no plans to add library capacity to the area.⁸ Therefore, this impact would be considered less than significant. In addition, the payment of recommended mitigation fees by the Project Applicant would reduce any potential impact of the Project on library services.

Recreation***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?***

Approximately 51 new permanent residents would be generated as a result of the Proposed Project that would utilize the park and recreational facilities in the Proposed Project area. According to the Community Plan, the existing parks satisfy the needs of the current residents, but the community is still deficient in the number of neighborhood parks. However, the Proposed Project, with its incremental population contribution, is not likely to substantially increase the rate of deterioration of park and recreational facilities in the area. Furthermore, the Project Applicant would be required by the City of Los Angeles to pay into the City parks and recreation fund via payment of Quimby fees. Payment of such required fees would reduce impacts to a less than significant level. Therefore, impacts upon maintenance of park and recreational facilities are considered less than significant. The following regulatory compliance measure shall be implemented:

Regulatory Compliance Measures

A-25 The Project Applicant shall pay all applicable Quimby fees for the acquisition and maintenance of park and recreational facilities.

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?

No new recreation facilities are proposed as part of the Proposed Project. Thus, no impact related to construction or expansion of such facilities would occur.

Utilities and Service Systems

⁸ Correspondence from the Los Angeles Public Library, undated (included in Appendix D).

Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

The Proposed Project would convey wastewater via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The HTP is a public facility, and, therefore, is subject to the State's wastewater treatment requirements. As such, wastewater from the Project Site is treated according to the wastewater treatment requirements enforced by the LARWQCB, and no impact would occur.

Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The Project Site is served by the Los Angeles Aqueduct Filtration Plant (LAAFP), which has a capacity to treat approximately 600 million gallons per day (mgd) and is currently operating at 75 percent of its capacity. The Proposed Project would consume approximately 4,807 gallons of water daily (or 0.005 mgd), and therefore, implementation of the Proposed Project is not expected to measurably reduce the LAAFP's capacity. The Proposed Project would have a less than significant impact.

Water services will be provided from the LADWP's 1240 service zone. It is likely that the residential development would entail extension of existing utilities that serve surrounding residential uses. Decisions regarding water distribution system extensions are made during the City's Subdivision process. Data from the LADWP's hydraulic analysis and the Project Applicant's street improvement plans must be evaluated to decide water service options for the Proposed Project. If it is determined that water mains or infrastructure upgrades are required, the Project Applicant would pay for such upgrades and a temporary disruption in service may occur, with proper notification to LADWP customers. Therefore, impacts resulting from water infrastructure improvements would be considered less than significant.

The Proposed Project would generate approximately 4,370 gallons (0.004 mgd) of wastewater daily.⁹ Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Treatment Plant (HTP), which treats an average daily flow of 362 mgd and has capacity to treat an average daily flow of 450 mgd. Implementation of the Proposed Project is not expected to measurably reduce the HTP's capacity, and therefore, the Project would have a less than significant impact.

Result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The Proposed Project would result in additional impervious surfaces and, thus, a maximum additional 0.96 cubic feet per second (cfs) net increase in runoff from a 25-year storm event. However, the San

⁹ Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, City of Los Angeles Bureau of Sanitation, May 13, 2015 (included in Appendix D).

Feliciano storm drain would have the capacity to accept the incremental increase in runoff. As stormwater from the Project Site would not exceed the capacity of existing stormwater drainage systems or require new or expanded stormwater facilities, this impact would be considered less than significant.

Have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

The LADWP is responsible for providing water services to the Project Site. The LADWP can generally supply water to developments within its service area, except under extraordinary circumstances. The 2010 Urban Water Management Plan projects a supply of 555,477 AFY in 2015. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, Los Angeles Aqueduct) is offset with MWD purchases to rise to the level of demand. The Project would have a less than significant impact upon water supplies.

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?

Utilizing 240 gallons/unit daily generation rate, the Project is anticipated to generate approximately 4,370 gpd (or 0.004 mgd) of wastewater. The HTP would have adequate capacity to treat the 0.004 mgd of wastewater generated by the Proposed Project, in addition to existing commitments, resulting in a less than significant impact.

Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Utilizing a daily solid waste generation rate of 12.23 pounds per unit, the Proposed Project would generate approximately 232 pounds or 0.12 tons of solid waste per day during operation. All solid-waste-generating activities within the City of Los Angeles, including the Project, would continue to be subject to the requirements set forth in California Assembly Bill (AB) 939, which requires each city and county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting (see Regulatory Compliance Measure A-26). Thus, the Project would divert 50 percent of its solid waste generated and dispose of 116 pounds or 0.06 tons of solid waste per day in the Sunshine Canyon Landfill. With a remaining daily intake capacity of 3,100 tons per day, the landfill would have adequate capacity to accommodate the operational solid waste generated by the Proposed Project. Therefore, a less than significant impact associated with solid waste generation would occur.

Regulatory Compliance Measures

A-26 All solid waste generated at the Project Site by the Proposed Project shall be disposed of in accordance with all applicable federal, state, and local regulations related to solid waste,

including AB 939, which requires each city and county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting.

Comply with federal, state, and local statutes and regulations related to solid waste?

Per Regulatory Compliance Measure A-26, solid waste generated at the Project Site by the Proposed Project would be disposed of in accordance with all applicable federal, state, and local regulations related to solid waste, including AB 939. Therefore, no impact would occur.

V. ENVIRONMENTAL IMPACT ANALYSIS

B. AESTHETICS

INTRODUCTION

This section describes the visual setting of the Project Site and evaluates the potential for impacts to the visual (aesthetic) environment due to the development of the Proposed Project. This examination of aesthetics is based upon an evaluation of two categories of values: visual character and the attributes of the related views and/or viewsheds.

Visual character is comprised of a combination of elements making up the aesthetic qualities of both existing conditions on the Project Site and the Proposed Project itself, such as land use, building scale and mass, proportion and balance, and ambience. The visual character of a project and site is typically evaluated with respect to its physical components and within the context of its neighborhood through an analysis of its compatibility with the land uses of the immediately surrounding areas. The values and issues generally associated with visual character and the degree of associated environmental impact tend to be subjective - more so with respect to the aesthetic qualities of the project, in and of themselves; less so with respect to the compatibility of the aesthetic qualities with the surrounding environment. The inherent subjectivity of issues and values relative to visual character often makes it difficult to conclusively determine what constitutes a "significant impact" under CEQA.

Visual impacts are also analyzed through an examination of views and/or viewsheds. Viewsheds refer to the visual qualities of a geographical area. The horizon, topography, and other natural features that give an area its visual boundary and context define the geographical area. Viewshed impacts are typically characterized by the loss and/or obstruction of existing scenic vistas or other major views in the area of the site that are available to the general public. For the purposes of this analysis, views are categorized by distance from the observer into three classifications: foreground (the view within approximately 500 feet of the observer), middleground (the view generally beyond 500 feet of the observer to approximately 2,700 feet), and background (the view beyond 2,700 feet of the observer). View analysis is also based upon relative visibility with regard to viewing location and future development being proposed on-site. Views treated within this analysis assume fair weather daytime conditions.

This section also addresses the potential for adjacent land uses (sensitive receptors) to be disturbed by light and glare generated or reflected by the Project.

ENVIRONMENTAL SETTING

The area surrounding the Project Site is characterized by suburban development consisting of mostly residential and some commercial land uses. The irregularly-shaped Project Site is bounded by San Feliciano

Drive to the west and north, Mulholland Drive to the south and east, the Girard Reservoir to the northeast, and single-family residences to the west. Consisting of two parcels of land, the Project Site is currently surrounded by a chain link fence and is occupied by a vacant, two-story single-family residence, sheds, and an aged kennel at the east-central portion of the property along Mulholland Drive. The remaining portions of the site consist of undeveloped open space that is occupied by various trees, shrubs, low-lying weeds, and grasses.

Specific land uses surrounding the 6.2-acre Project Site include one- and two-story single-family homes to the north, east, and west; the Girard Reservoir and the City of Los Angeles Department of Water and Power Pumping Station to the northeast; a private parochial high school and convent to the southeast; and a two-story commercial office building with a surface parking lot and a small shopping center to the southwest. The City of Calabasas begins approximately 365 feet south of the Project Site, along Mulholland Highway. The private parochial high school (Louisville High School) and convent property houses multiple structures and contains a surface parking lot that parallels Mulholland Drive. The two-story commercial office building, Mulholland Plaza, is located at the southwest corner of the intersection between Mulholland Drive and Mulholland Highway. The Gelson's Village Calabasas shopping center is located in the jurisdiction of the City of Calabasas adjacent to Mulholland Plaza, and consists of retail and commercial stores, including a Gelson's Supermarket, yoga studio, Chase Bank, restaurants, and a dry cleaner. Adjacent to Gelson's Village Calabasas is a Shell gas station.

Project Site

The Project Site is an irregularly shaped 6.2-acre property located entirely within the inner corridor of the Mulholland Drive Scenic Parkway Specific Plan area. Photographs of the site as it currently appears are shown on Figures V.B-2 through V.B-5, while Figure V.B-1 provides a guide to the locations of the photographs in the context of the site and surrounding properties. The most visually prominent feature of the Project Site is the grove of Coast Live Oak trees that occupies a large portion of the northern and central portions of the property. There are 155 Coast Live Oak trees in the grove, many of which form a dense canopy that extends across the site from Mulholland Drive to San Feliciano Drive. In addition to the oak trees, there are 44 other trees on the Project Site including Southern California Black Walnuts, Willows, Mexican Elderberry and a variety of ornamental trees (see Table IV-1 in Section IV, Environmental Setting and Tree Report in Appendix G). Along Mulholland Drive, the oak trees form an effective screen that restricts off-site views into the interior of the site (see Photographs K and L, Figure V.B-2). Along San Feliciano Drive, the continuous canopy of the oak trees creates shaded woodland in the northern portion of the site, but does not entirely block off-site views of the site (see Photograph L, Figure V.B-2).

A vacant, two-story single-family residence, sheds and an aged kennel occupy the east-central portion of the property near Mulholland Drive. A couple of security lights are maintained on the abandoned house,

which is visible from Mulholland Drive. However, the house, sheds and kennels are not visible from San Feliciano Drive. The remaining portion of land is undeveloped open space.

As previously discussed, the 5.91-acre Girard Reservoir and the City of Los Angeles Department of Water and Power Pumping Station are located adjacent to and northeast of the Project Site (see Photographs I and J, Figure IV-8). The Girard Reservoir, a raised earthen structure, is visible through the shade of the oak tree grove. Because the Project Site wraps around the southern portion of the Girard Reservoir, the two properties appear to be a single island of open space of approximately 12 acres located in the midst of a fully built-out suburban single-family neighborhood. Together, the Project Site and the Girard Reservoir create a bucolic ambiance for the neighborhood. However, several features detract from the area's aesthetic qualities, including poorly maintained chain-link fencing along the western property line of the reservoir and the Project Site (Photograph M, Figure V.B-3); overhead power lines along the San Feliciano Drive frontage (Photograph N, Figure V.B-3); a poorly maintained low concrete block retaining wall along a portion of the Project Site's San Feliciano Drive frontage; the abandoned and deteriorating house, shed and kennels (Photograph B, Figure IV-4; and Photograph C, Figure IV-5); and neglected weedy growth, particularly where it is growing up against and through the perimeter chain-link fencing (Photograph M, Figure V.B-3).

The central portion of the Project Site is an open weed covered field. There are no trees in the field area and views into the interior of the site are unobstructed. The overhead power lines that run through the middle of the field visually dominate this area. The southwestern portion of the Project Site is tucked behind existing homes and is less easily seen from San Feliciano Drive.

There are no National Register or California State Historic Resource properties, California Historical landmarks, California Points of Historic Interest, or City of Los Angeles Historic-Cultural Monuments on the Project Site. In addition, there are no rock-outcroppings or other major geologic or topographic features of particular note on the Project Site. Furthermore, there are no views of off-site rock-outcroppings or other major geologic or topographic features that may be seen looking through the Project Site from any vantage point. However, because the site is located adjacent to the Mulholland Scenic Parkway, it is a visible element within the vista available to travelers along the scenic parkway.

Views of the Project Site and Protection of the Viewshed

The Project Site is primarily visible from three public roadways: Mulholland Drive, Mulholland Highway, and San Feliciano Drive. It is also visible from nearby private homes located to the southwest, west, and northwest. There are also partial views of the Project Site available from portions of Louisville High School, the Mulholland Plaza commercial office building and grounds, and, to a lesser extent, from portions of the Gelson's Village Calabasas shopping center. There may also be limited views of the site from other locations in the general vicinity. The Project Site is also visible from a few private residences in the immediate area. However, the viewshed protection provisions of the Mulholland Scenic Parkway

Specific Plan are directed at preserving, complementing, and/or enhancing the public views from Mulholland Drive (see Section 2.E of the Specific Plan). Therefore, although impacts on surrounding homes and land uses are discussed, the focus of this analysis is on the Project's impact on public views, particularly those from Mulholland Drive.

Views of the Project Site from Mulholland Drive

Because of the Project Site's relatively small size (6.2 acres), adjacency to the Mulholland Drive right-of-way, and constraints on roadway lines-of-sight, passengers in westbound vehicles and pedestrians/bicyclists primarily experience the site in terms of foreground views. There are no background views of or through the Project Site and only limited foreground/middle-ground views. Views of the Project Site first become available in the vicinity of the Girard Reservoir property, a few hundred feet to the northeast of the site boundary. Obstructions in the line-of-sight along Mulholland Drive caused by a roadway curve, a change in roadway gradient, and the intervening dense tree canopy along the north side of Mulholland Drive combine to limit views of the site from the east.

The oak tree canopy along the Mulholland Drive right-of-way is the first visual evidence of the Project Site for approaching vehicles and pedestrians/bicyclists. However, views into the interior of the site only become available as vehicles and pedestrians/bicyclists pass a dilapidated white wooden fence that stretches several hundred feet along the north side of Mulholland Drive adjacent to the site (see Photograph O, Figure V.B-4). To the casual observer, the dense growth of oak trees along the Mulholland Drive right-of-way dominates the foreground visual field, although the existing abandoned house on the property is briefly visible from passing cars, and for a more extended time for pedestrians and bicyclists. From the street, the interior of the Project Site is dominated by the shaded grove of trees. There are no views from Mulholland Drive through the Project Site to the existing homes along San Feliciano Drive.

The oak trees on the site range from trees with a diameter of canopy of as small as four feet by five feet to trees with a canopy of 108 feet by 78 feet. There are a few smaller trees with canopies of less than 15 feet by 15 feet, but on average the smaller trees have canopies of approximately 20 feet by 20 feet. Similarly, while there are a few larger trees with canopies of approximately 80 feet by 70 feet, on average the trees have canopies ranging from approximately 40 feet by 40 feet to 60 feet by 70 feet. Of the 199 trees on-site, only seven have an aesthetic value of "excellent" and an additional 56 have an aesthetic value of "good" as defined by the arborist's report (contained in Appendix G to this Draft EIR). The largest oak tree on the site is considered to be in "excellent" condition. However, the majority of the trees on-site are considered to have an aesthetic value of "fair" to "poor".

For vehicles and pedestrians/bicyclists approaching on Mulholland Drive from the west, the Project Site first comes into view as the cars begin their descent from a low saddle in the roadway heading toward the intersection of Mulholland Drive and Mulholland Highway. There are no background views of or

through the Project Site from the west. The first limited middleground views are of the dense tree canopy as it rises above and behind the roof line of adjacent homes (see Photograph P, Figure V.B-4; and Photograph Q, Figure V.B-5). There are no middleground views through the Project Site to the existing homes along San Feliciano Drive. Dense vegetation along the site's property line, a curve in the roadway, and the necessity to pay attention to the signalized intersection would typically combine to draw the driver's attention away from the site until their vehicle passes through the intersection (see Photograph R, Figure V.B-5). Of course, pedestrians (and bicyclists to a somewhat lesser degree) are not so limited in their potential visual perception of the site. Once past the intersection, occasional breaks in the dense vegetation along the edge of the Mulholland Drive right-of-way provide fleeting foreground glimpses into the interior of the site. From this perspective, the interior of the site appears to be dominated by the dense tree canopy that obscures views of open patches of land within the site.

Views of the Project Site from Mulholland Highway

For passengers in vehicles, pedestrians, and bicyclists traveling northbound on Mulholland Highway, the first views of the Project Site become available in the vicinity of Freedom Drive, approximately 900 feet south of the intersection with Mulholland Drive. From this general area, the views are panoramic. Foreground views to the west encompass a Shell gas station, Gelson's Village Calabasas shopping center, and the Mulholland Plaza office building and grounds. In the middleground, behind and rising above the Gelson's Village Calabasas shopping center, multi-family housing is prominently visible. To the east, a single-family residential subdivision dominates the foreground and blocks more distant views. Looking straight ahead (north) over the tree canopy on the Project Site, the single-family homes of Woodland Hills extend visibly north toward the flatlands of the San Fernando Valley. The sizes and shapes of the individual trees are lost in the massing of the dense green tree canopy. The vegetation along the southern perimeter effectively obstructs the views into the interior of the Project Site (see Photograph P, Figure V.B-4; and Photograph R, Figure V.B-5).

Views of the Project Site from San Feliciano Drive

San Feliciano Drive, a typical Woodland Hills single-family residential street, borders the Project Site on the west and northwest. Its winding north-south alignment closely follows the terrain of the foothills. To the north and south of the Project Site, San Feliciano Drive is developed with homes on both sides of the street. The homes are attractive and well maintained.

Because of its winding alignment, there are no distant views of the Project Site from San Feliciano Drive. For southbound vehicles, pedestrians, and bicyclists, the first view of the site occurs at the approach to Cerrillos Drive. Views of the northern portion of the Project Site are dominated by the foreground oak tree grove and, to a lesser extent, by the partially visible Girard Reservoir (see Photograph N, Figure V.B-3). As vehicles on San Feliciano Drive pass the central portion of the Project Site, there is a brief view

into the flat field area. The southern portion of the site is only briefly visible. For pedestrians and bicyclists, these views can be more prolonged.

Constraints to the line-of-sight for northbound vehicles on San Feliciano Drive are also present. Roadway curves, a downhill slope, and the intervening line of existing homes combine to block views of the Project Site interior until the passing vehicle, pedestrian, or bicyclist has practically reached the boundary of the site (see Photograph M, Figure V.B-3). For northbound vehicles, no views of the southern portion of the Project Site are available. Views into the central portion of the site are unrestricted but brief for passing motorists, but prolonged for pedestrians, bicyclists, and residents. The northern portion of the site is dominated by the grove of oak trees.

Views of the Project Site from Surrounding Land Uses

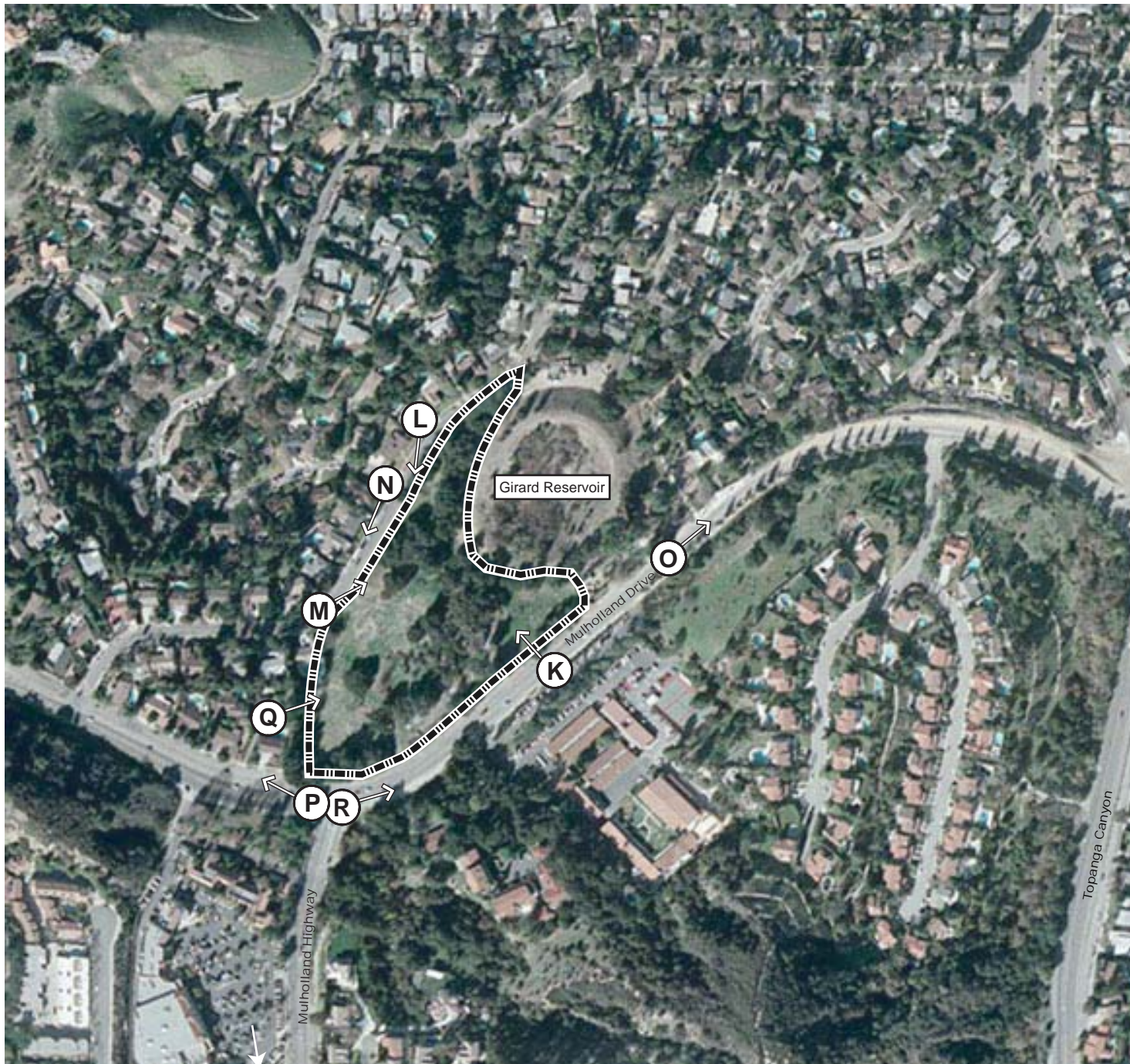
The Project Site is visible from the yards and windows of a few nearby homes along San Feliciano Drive (see Photograph G, Figure IV-7). Primarily, the site is visible from the existing homes on the west side of San Feliciano Drive, across from the site. The closest of these homes are built on raised pads with front yards that are oriented toward the Project Site. The site is also visible from a few homes on the east side of San Feliciano Drive, southwest of the site. Except for the home that is immediately adjacent to the southwest property line, the homes further south have only partial views of the Project Site from their front yards and some limited potential for partial views from their side and back yards. The Girard Reservoir serves as an effective barrier to views of the Project Site from the homes along Mulholland Drive to the northeast of the reservoir.

Existing homes are located along Mulholland Drive immediately to the west of the Project Site. With the exception of the closest of these homes, it is unlikely that the residents of these homes have direct views of the Project Site. Foremost, there is dense vegetation along the western perimeter of the site to block views into the interior. Also, these homes face south and are not oriented toward the site (see Photograph R, Figure V.B-5).

Louisville High School is located directly across Mulholland Drive from the Project Site. A school parking lot is located at street grade on the south side of Mulholland Drive. A row of large oleander bushes breaks up the view of the Project Site from the parking lot, but the site is still readily visible through large gaps between the parking lot's oleanders (see Photograph H, Figure IV-7). The Project Site is generally not visible from Louisville High School classrooms and the convent, which are set back from Mulholland Drive. Views of the site from the main portion of the high school campus are mostly blocked by a retaining wall, fencing, and landscaping.

The Project Site is not generally visible from the commercial uses to the southwest (i.e., Gelson's Village Calabasas and the Mulholland Plaza). The dense growth of vegetation along the site's southern perimeter

forms an effective barrier that prevents views into the interior of the Project Site from being obtained from these commercial uses.



Legend

-  Photo Location
-  Project Site





Photo K: Project site oak trees along Mulholland Drive; abandoned home is visible in gap between trees.



Photo L: Oak trees along San Feliciano Drive/northwest portion of Project Site.

Source: CAJA Environmental Services LLC, 2015.



Photo M: Poorly maintained site fencing and weedy growth along San Feliciano Drive.



Photo N: Dense Project Site oak tree grove along San Feliciano Drive and overhead utility lines.

Source: CAJA Environmental Services LLC, 2015.



Photo O: View looking east, across Mulholland Drive, at adjacent properties to the east of the Project Site.



Photo P: View looking west along Mulholland Drive from Mulholland Highway. Vegetation blocks view into the Project Site.

Source: CAJA Environmental Services LLC, 2015.



Photo Q: View of nearest home to Project Site on Mulholland Drive frontage road; Project Site is shown as dense vegetation behind houses.



Photo R: Looking east along Mulholland Drive from Mulholland Highway intersection.

Source: CAJA Environmental Services LLC, 2015.

Night Lighting

With the exception of a couple of security lights that are maintained on the abandoned house, the Project Site currently has no night lighting and is dark at night. However, the perimeter of the site receives some spillover light from nearby off-site lighting sources. In particular, some of the homes on San Feliciano Drive maintain bright outdoor security and landscape lighting. There are also a few, widely spaced streetlights on San Feliciano Drive. The closest streetlight is located at the intersection of San Feliciano Drive and Cerrillos Drive. A greater source of lighting in the area is the pole-mounted streetlights that are evenly spaced on the south side of Mulholland Drive between Topanga Canyon Boulevard and Mulholland Highway, and on the north side of Mulholland Drive west of the Mulholland Highway intersection. Also, street lighting brightly illuminates the adjacent signalized intersection of Mulholland Drive and Mulholland Highway. However, the Gelson's Village Calabasas shopping center, and to a lesser extent the Mulholland Plaza, provides the major source of night lighting in immediate vicinity of the Project Site. Louisville High School and convent is also a source of night lighting in the immediate vicinity, but contributes far less light than the shopping center. There is no observable night lighting at the Girard Reservoir.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G of the State CEQA Guidelines

In accordance with Appendix G to the State CEQA Guidelines, the Project would have a significant Aesthetic impact if it would:

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

City of Los Angeles CEQA Thresholds Guide

Based upon criteria established in the *L.A. CEQA Thresholds Guide*, the determination of significance for the Project's impacts on visual resources and views shall be made on a case-by-case basis considering the following factors:

Visual Resources

1. The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished.
2. The amount of natural open space to be graded or developed.
3. The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.
4. The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image.
5. The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements.
6. The degree to which the Project would contribute to the area's aesthetic value.
7. Applicable guidelines and regulations.

Views

1. The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean).
2. Whether the Project affects views from a designated scenic highway, corridor, or parkway.
3. The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment).
4. The extent to which the Project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

Project Impacts

The Proposed Project is the development of 19 detached single-family homes on the 6.2-acre Project Site located entirely within the inner corridor of the Mulholland Drive Scenic Parkway. Grading for the building pads, access road, drainage improvements, and utility installation would affect approximately 3.83 acres (or 61 percent of the site). In order to reduce the size of the grading footprint, the Project would utilize retaining walls, where practical, rather than manufactured slopes. Of the Project Site's 6.2 acres of gross total area (269,857 square feet), building footprint coverage would account for

approximately 0.86 acre (37,462 square feet or 13.8 percent of the total Project Site). Approximately 0.96 acre (41,861 square feet or 15.5 percent of the site) would be covered by other forms of impervious surfaces, including streets/driveways, patios, and walkways. A total area of approximately 1.35 acres (58,625 square feet or 21.7 percent of the site) would be covered with landscaping. In addition, there would be approximately 3.03 acres (132,116 square feet or 48.9 percent of the site) of undisturbed open space. The proposed homes would have a maximum height of three stories or 36 feet, as established by the Mulholland Scenic Parkway Specific Plan Inner Corridor regulations. However, their architectural style has not yet been determined; however, the selected style(s) will be designed to be compatible with the architectural styles already existing in the area and to be consistent with the Specific Plan. Street lighting in conformance with City standards is proposed on the public street that would enter the site from San Feliciano Drive. Other than this, primary nighttime illumination would be provided by low intensity carriage lights mounted on the exterior walls of the homes. A 40-foot setback would be maintained along Mulholland Drive and 13 to 28.5-foot setbacks would be maintained along San Feliciano Drive, varying from lot to lot.

Viewshed Analysis

The Mulholland Scenic Parkway Specific Plan Design and Preservation Guidelines require that a viewshed analysis be prepared for any project within the Inner Corridor, in order to determine the extent to which building heights may negatively impact views. The viewshed analysis and discussion for this Project are presented in Section V.G (Land Use and Planning) of this Draft EIR.

As shown in Section V.G, Table V.G-5, the viewshed analysis indicates that intervening topography, vegetation and/or future structures would eliminate the potential to see a majority of the proposed homes from Mulholland Drive. Of the 19 new homes, 15 homes (or approximately 79 percent) would be entirely screened from view at all points along the Mulholland Drive right-of-way contiguous with the property. The homes that would not be visible are those that would be constructed on Lots 5-19. A total of three homes (or approximately 16 percent of the total number of lots in the Project) may be partially visible from one or more points along Mulholland Drive, but would be substantially screened by intervening vegetation, topography, and/or structures as indicated. The homes that would be partially visible are those that would be constructed on Lots 1, 2, and 4. One home (to be constructed on Lot 3) would be wholly visible from Mulholland Drive, although it would be blocked from view at some points along Mulholland Drive.

The homes that would be partially or fully visible from Mulholland Drive would be seen through gaps in the existing screening vegetation along Mulholland Drive. The Project proposes to fill the gaps in the existing screening vegetation with additional native trees and shrubs. Once the new landscaping has matured (in approximately five years), none of the homes would be visible from Mulholland Drive.

Retaining Wall Impacts

The Project proposes to install a total of six retaining walls that may be visible from the Mulholland Drive right-of-way. As a substitute for manufactured slopes, retaining walls can be used to reduce the area of the Project Site that would otherwise be graded in preparation for Project construction. In turn, a reduction in the Project's grading "footprint" may result in fewer impacts to oak trees on the site. Hence retaining walls, when not visually intrusive, can serve to reduce a project's aesthetic impact. However, retaining walls that are visible from the Mulholland Drive right-of-way may be considered incompatible with the Mulholland Scenic Parkway Specific Plan's purpose of providing "maximum preservation and enhancement of the parkway's outstanding and unique scenic features and resources".¹

The following is a brief discussion of the location, length, height and visibility of the Project's proposed retaining walls:

- A retaining wall is proposed to be located along the backside of Lots 1 through 4. This generally straight wall would have an overall length of approximately 140 feet and would have varying heights that range from 0.5 to 10 feet. This wall would be minimally visible from Mulholland Drive because (1) it would be located behind the homes on Lots 1-4; (2) it would mostly face inward toward the center of the Project Site and not toward the scenic parkway; (3) the top of the wall would be below the grade of the adjacent portion of Mulholland Drive; (4) it would be setback approximately 150 feet from the edge of the existing Mulholland Drive pavement; and, (5) there are a substantial number of oak trees within the Mulholland Drive right-of-way that would partially block views toward the wall (see Figure V-G-4, Viewshed Impact Analysis, in Section V.G of this Draft EIR).
- A second retaining wall would be located behind (on the south side of) Lots 5 and 6. This wall would have an overall length of approximately 80 feet and a maximum height of approximately 11 feet. This wall would also be minimally visible from Mulholland Drive because (1) it would face inward toward the center of the Project Site and not toward the scenic parkway; (2) a portion of an existing knoll within the right-of-way rises approximately 10 feet above the street grade and forms a barrier to views of the interior; (3) the top of the wall would generally be about 10 feet or more below the grade of the adjacent portion of Mulholland Drive; (4) the wall would be setback approximately 185 feet from the edge of the existing Mulholland Drive pavement; and (5) there are a substantial number of oak trees within the Mulholland Drive right-of-way that would partially block views toward the wall (see Figure V.G-4, Viewshed Impact Analysis, in Section V.G of this Draft EIR).

¹ City of Los Angeles, *Mulholland Scenic Parkway Specific Plan, Section 2, page 3.*

- A pair of irregularly shaped retaining walls is proposed to wrap around Lots 9 and 10. In total these walls would be approximately 120 feet in length and would have variable heights ranging up to approximately 19 feet. Two walls are required in portions of this area in order to comply with City code provisions limiting individual retaining walls to a maximum height of 12 feet, but which allow two retaining walls of up to 10 feet each if separated by a minimum horizontal distance of three feet. These walls would also be minimally visible from Mulholland Drive for similar reasons as the two previously discussed walls: (1) they would mostly face inward toward the center of the Project Site and not toward the scenic parkway; (2) where the walls would face outward, they would be located behind a knoll which is an effective barrier to views of the development; (3) the top of the walls would generally be at or below the grade of the adjacent portion of Mulholland Drive; (4) the walls would be setback at least 320 feet from the edge of the existing Mulholland Drive pavement; and (5) there are a substantial number of oak trees within the Mulholland Drive right-of-way that would partially block views toward the walls (see Figure V.G-4, Viewshed Impact Analysis, in Section V.G of this Draft EIR).
- A fifth, irregularly shaped retaining wall is proposed to wrap around the back sides of Lots 11 and 12. This wall would be approximately 110 feet in length and would have variable heights ranging up to five feet. This wall would be minimally visible from Mulholland Drive because: (1) it would be located in the northeast corner of the Project Site; (2) it would be setback approximately 500 feet from the edge of the existing Mulholland Drive pavement; and (3) there are a substantial number of oak trees within the Mulholland Drive right-of-way and along the Girard Reservoir property boundary that would virtually completely block views toward the wall (see Figure V.G-4, Viewshed Impact Analysis, in Section V.G of this Draft EIR).
- A sixth retaining wall would be located in the front yard of Lot 13 adjacent to the proposed public street right-of-way. This wall would be approximately 60 feet in length and would have a variable height ranging up to eight feet. This wall would not be visible from Mulholland Drive because: (1) it would be located in the north-central portion of the Project Site; (2) it would be setback approximately 500 feet from the edge of the existing Mulholland Drive pavement; and (3) there are a substantial number of oak trees within the Mulholland Drive right-of-way and within the Project Site that would virtually completely block views toward the wall (see Figure V.G-4, Viewshed Impact Analysis, in Section V.G of this Draft EIR).

Tree Impacts




The Project would convert the 6.2-acre Project Site from its current mostly undeveloped condition to a residential setting. As a result, 28 of the 199 trees on the site would require removal, including 15 Coast Live Oaks (four of which are dead). No Southern California black walnut trees would be removed. Coast Live Oaks and Southern California black walnuts are afforded protected tree status by the City of Los

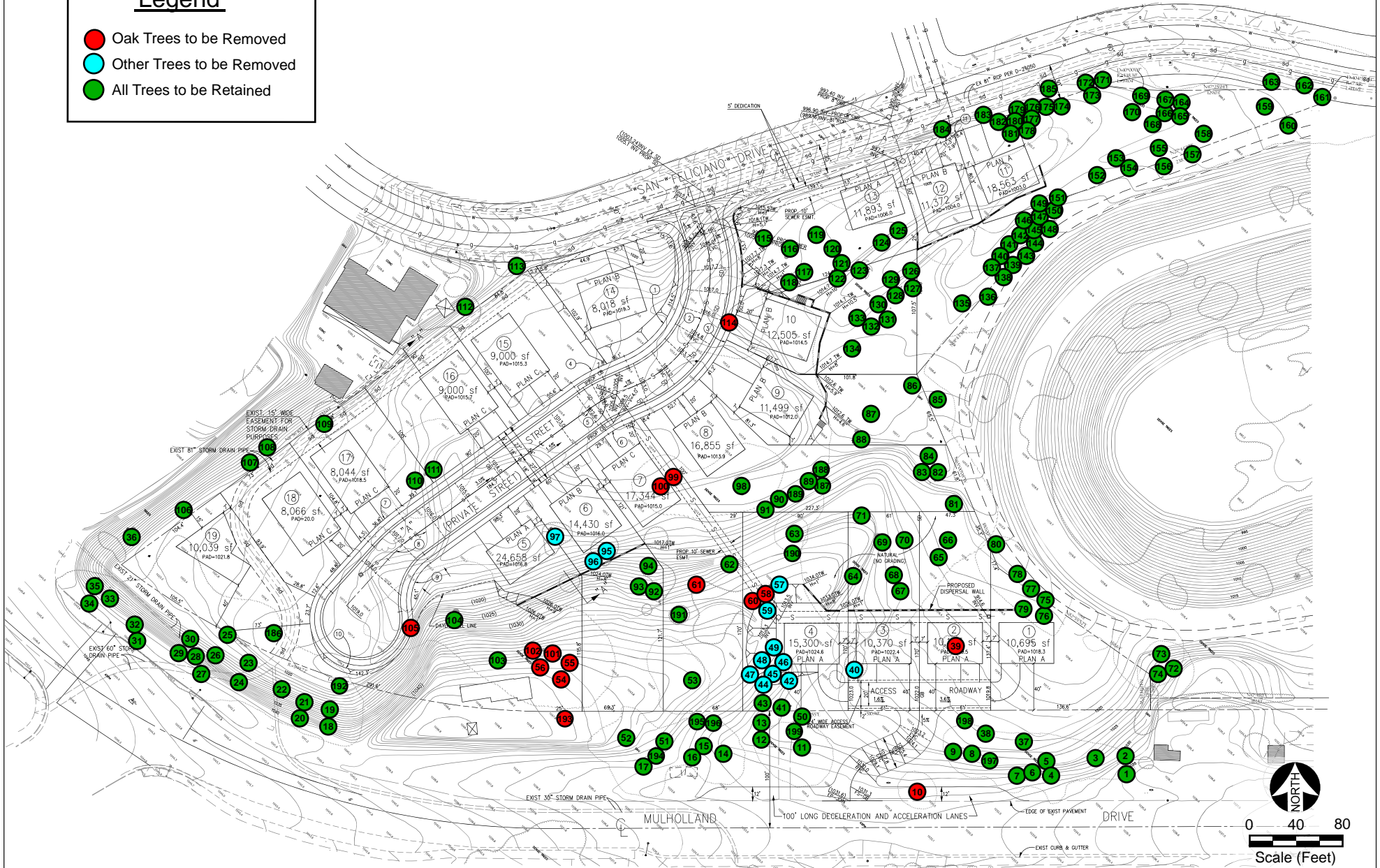
Angeles' Protected Tree Ordinance, Ordinance 177,404 (see Section V.G, Land Use, for further discussion). Figure V.B-6, Tree Impact Map, shows the locations of all the trees on the Project Site, including those slated for removal and listed below in Table V.B-1, and identifies the trees to be retained.

Table V.B-1
Summary of Tree Removals

Tree ID	Common Name	Aesthetic Rating
10	Coast Live Oak	E (near dead/hazardous)
39	Coast Live Oak	D
40	Apple	C
42	Mexican Fan Palm	C
44	Mexican Fan Palm	C
45	Mexican Fan Palm	C
46	Mexican Fan Palm	C
47	Mexican Fan Palm	C
48	Mexican Fan Palm	B
49	Mexican Fan Palm	B
54	Coast Live Oak	F (dead)
55	Coast Live Oak	D (falling limbs/hazardous)
56	Coast Live Oak	F (dead)
57	King Palm	B
58	Coast Live Oak	D
59	Fig	C
60	Coast Live Oak	D
61	Coast Live Oak	D
95	Mexican Elderberry	D
96	Mexican Elderberry	D
97	Mexican Elderberry	D
99	Coast Live Oak	D (fallen)
100	Coast Live Oak	B
101	Coast Live Oak	F (dead)
102	Coast Live Oak	D (leaning trunks/hazardous)
105	Coast Live Oak	F (dead)
114	Coast Live Oak	B
193	Coast Live Oak	C
<i>A. Excellent – This tree is a healthy and vigorous tree characteristic of its species and free of any visible signs of disease or pest infestation</i>		
<i>B. Good – This tree is healthy and vigorous. There are minor visible signs of disease and pest infestation</i>		
<i>C. Fair – This tree is healthy in overall appearance, but there is a normal amount of disease and/or pest infestation</i>		
<i>D. Poor – This tree is characterized by exhibiting a greater degree of disease and/or pest infestation or structural instability than normal and appears to be in a state of decline</i>		
<i>E. Very Poor – This tree exhibits extensive signs of dieback</i>		
<i>F. Dead – This tree exhibits no signs of life at the time of field evaluation</i>		
<i>Source: Revised Horticultural Tree Report, Trees Etc., September 21, 2009 and Correspondence from Paul A. Lewis, Landscape Architect, January 12, 2015.</i>		

Legend

-  Oak Trees to be Removed
-  Other Trees to be Removed
-  All Trees to be Retained



A review of Figure V.B-6 demonstrates that the 15 oak trees and most of the other trees proposed for removal are located within the interior of the Project Site and are not readily visible from off-site locations. The oak trees are primarily situated behind groves of existing trees and/or behind intervening knolls. Additionally, 12 of the 15 oak trees to be removed have an aesthetic rating of poor or dead (D, E and F), while the remaining three are rated fair to good (C and B). While the oak woodland on the Project Site has high aesthetic values, the individual oak trees slated for removal have not acquired a distinctive significance with reference to the other trees or monuments on the site. See Section V.G for further discussion of the Mulholland Scenic Parkway Specific Plan, which prohibits the removal of any oak trees without the prior written approval of the Planning Director after making the required findings.

Light and Glare Impacts

The Project would convert the mostly dark site to an illuminated residential setting, albeit one with limited lighting. There would be lighting from the low intensity carriage lights proposed to be mounted on the exterior walls of the homes and from the minimum level of public street lighting required by the City. Also, there would be window glow and exterior landscape and security lighting. Car headlights, although both infrequent and intermittent, would contribute to light on the Project Site. The level of lighting within the Project is expected to be low for several reasons. First, 3.03 acres (or 49 percent of the site) would be retained as open space and would not be illuminated. Second, an additional area of 1.35 acre (or 22 percent of the site) would be devoted to landscaping and would receive only low levels of lighting. Lastly a substantial tree canopy would be retained on the site to shield much of the site illumination from off-site locations. Nevertheless, some glow from the development area would be visible from off-site locations.

Lighting would be visible from Mulholland Drive, although it would not be expected to cause disability, discomfort or nuisance glare.² As indicated above, the retained tree canopy would largely screen Project lighting. Further, as discussed above, 15 of the Project homes would be entirely screened from view at all points along the Mulholland Drive right-of-way contiguous with the property. Only one home would be wholly visible from Mulholland Drive, and it would be blocked from view at some points along

² *Glare is the sensation produced by a bright source within the visual field that is sufficiently brighter than the level to which the eyes are adapted to cause annoyance, discomfort or loss in visual performance and visibility (i.e., blinding light). Disability glare is caused by stray light scattered within the eye, which reduces the contrast of the retinal image. Streetlights, pedestrian lights, floodlights, and landscape lights as well as bright reflectors, can contribute to disability glare. Discomfort glare is caused by high contrast or a non-uniform distribution of luminance in the field of view. Discomfort glare can be reduced by decreasing the luminance of the light source, by increasing the background luminance around the source, or by adjusting the aiming angle of the source. Nuisance, or annoyance, glare occurs when light appears where it does not belong. (Source: Illuminating Engineering Society (IES) Handbook, 9th Edition).*

Mulholland Drive. The remaining three homes may be partially visible from one or more points along Mulholland Drive, but would be substantially screened by intervening vegetation, topography and/or structures, as indicated. Lastly, Mulholland Drive in the vicinity of the Project Site (i.e., from Topanga Canyon Boulevard to Valley Circle Drive) is already illuminated by pole mounted street lighting.

Night lighting from the Project would also be visible from San Feliciano Drive, immediately adjacent to the development area, and from neighboring homes. As previously mentioned, there are widely spaced pole mounted streetlights on San Feliciano Drive and some of the homes in the area have installed bright landscape and security lighting in their front yards facing toward the Project Site. Consequently, the lighting from the Project is expected to be comparable to the existing lighting in the surrounding residential neighborhood.

Lastly, the Project Site is located immediately adjacent to the brightly illuminated intersection of Mulholland Drive and Mulholland Highway. Furthermore, just to the southwest of this intersection is the brightly illuminated Gelson's Village Calabasas shopping center. These existing sources of lighting in the immediate vicinity of the Project Site substantially moderate the effect of new lighting from the Project on the Mulholland Scenic Parkway and on existing land uses in the area.

When considered together, these various sources of existing night lighting in the surrounding area combined with the low level of lighting that would be visible from the Project Site would ensure that the new illumination from the Project would not represent a source of substantial light or glare which would affect nighttime views in the area. Therefore, the aesthetic impact of the Project's night lighting would be less than significant.

Scenic Vista Impacts

The purpose of the Specific Plan and Design and Preservation Guidelines is to preserve and enhance the unique character and scenic features of the Mulholland Scenic Parkway. In the immediate vicinity of the Project Site, the scenic corridor is developed with single-family and multiple-family housing, an office building, a shopping center, a high school, and street lighting. As a consequence of this development, the aesthetic values of the scenic vistas along this portion of the parkway have been compromised and no longer retain the high scenic character that distinguishes other portions of the parkway. As discussed in greater detail in Section V.G, Land Use and Planning, while the Project would transform a wooded area into a residential setting, 15 of the Project homes would be entirely screened from view at all points along the Mulholland Drive right-of-way contiguous with the property. Only one home would be wholly visible from Mulholland Drive, and it would be blocked from view at some points along Mulholland Drive. The remaining three homes may be partially visible from one or more points along Mulholland Drive, but would be substantially screened by intervening vegetation, topography and/or structures.

The consulting landscape architect has indicated that full screening from the new landscaping would occur in approximately five years following planting. Through Project Site design and landscaping, the proposed homes would not be visible from the scenic parkway and the Project would “preserve and enhance the unique character and scenic features of the Mulholland Scenic Parkway”. Therefore, Project impacts to scenic vistas would be less than significant and mitigation measures are not required. Nevertheless, Project Design Feature B-1 restates that the Project Applicant must: (1) implement a proposed master landscape plan that is in conformance with the Design Review procedures and landscape guidelines established by the Mulholland Scenic Parkway Specific Plan; and (2) that the proposed master landscape plan must achieve total screening of Project homes through the planting of new native trees and shrubs.

Because the proposed retaining walls would only be minimally visible from Mulholland Drive, they would not be expected to have a substantial adverse effect on a scenic vista. Therefore, the aesthetic impact of the retaining walls on a scenic vista would be less than significant and additional mitigation is not required.

The Project would remove 28 trees, including 15 protected trees, from the site. Due to the large number of trees and dense tree canopy on the site, the trees slated for removal are not prominently visible from Mulholland Drive. Furthermore, the trees have not acquired a distinctive significance with reference to the other trees or monuments on the site nor would the removal of the trees be expected to increase soil erosion on the site. While the removal of any one of the trees would not be expected to have a substantial adverse effect on a scenic vista, the combined effect of the removal of 28 trees, including 15 protected trees, would diminish the tree canopy and the scenic vista as seen from Mulholland Drive. Therefore the removal of the 28 trees would result in a potentially significant impact to scenic vistas and mitigation is required.

Section 46.00 et seq. of the Los Angeles Municipal Code (LAMC), and Los Angeles City Ordinance No. 177,404 set forth regulations for the preservation of protected trees in the City and further provide that a protected tree cannot be removed or relocated without first obtaining a permit from the Board of Public Works. In addition, the Project Site is within the Mulholland Scenic Parkway Specific Plan (MSPSP) and is thus subject to the regulations and requirements of the MSPSP. The MSPSP calls for the preservation of as many mature trees on a Project Site as possible and requires that trees that are removed be replaced as follows: a minimum of two oak trees (minimum of 36-inch box size) are to be planted for each one that is removed, any native tree removed must be replaced at a two for one ratio (minimum of 15 gallon size) with individuals of the same tree type, and any non-native tree removed must be replaced at a one for one ratio (minimum of 15 gallon size). Further, as required by Los Angeles City Ordinance No. 170,978, a comprehensive landscaping program would be implemented for the Project. Therefore, while construction-related impacts to protected trees and other mature non-native trees on the site may be considered potentially significant; these impacts would be reduced to a less than significant level through

the implementation of Mitigation Measure D-6 (see Section V.D, Biological Resources, of this Draft EIR), and project development in accordance with the requirements under the MSPSP and the LAMC. Mitigation Measure D-6 provides for the protection and preservation of the 140 coast live oak trees, the 11 Southern California black walnuts, and the 20 other trees (including three native Mexican elderberry trees) that would be retained on-site, and for the mitigation for the loss of 15 coast live oaks and three native trees (Mexican elderberry) and 10 non-native trees that would be removed during Project construction. With implementation of Mitigation Measure D-6, Project impacts to protected trees within a scenic vista would be reduced to a less than significant level.

State Scenic Highway Impacts

Trees comprise the major scenic resource on the Project Site. There are no rock outcroppings, historic buildings, or other features of significance on the site. As discussed above, oak and walnut trees are specifically protected by ordinance in the City of Los Angeles, particularly along the Mulholland Scenic Parkway; therefore, any removal of an oak or walnut tree must be considered a potentially significant aesthetic impact on scenic resources. As discussed above, with implementation of Mitigation Measure D-6, Project-related impacts to trees as a scenic resource would be reduced to a less than significant level.

The retaining walls would only be minimally visible from Mulholland Drive and San Feliciano Drive and none of the trees would be removed to accommodate the retaining walls; rather, the walls have been proposed as an alternative to more extensive grading to reduce impacts to oak trees. Therefore, the retaining walls would not substantially damage scenic resources and their impact with respect to scenic resources would be less than significant.

The construction of the proposed homes and the proposed mitigation to screen the homes would reduce visibility of the on-site oak woodland, the site's major scenic resource. Because the reduced visibility of the oak trees could be considered damage to a scenic resource, the Project would be considered to have a potentially significant aesthetic impact on scenic resources prior to mitigation. Implementation of Mitigation Measures B-11 through B-20 would reduce the Project's impact on scenic resources to a less than significant level.

Visual Character Impacts

Because the assessment of aesthetic impacts involves subjective judgments, there is always the possibility of a difference of opinion regarding the determination whether a proposed change in the visual environment constitutes a significant impact. While some may consider the introduction of a residential development into this oak woodland as a significant intrusion under any circumstances, others may consider the Project to be an attractive addition to the community and desire to purchase homes there. Nevertheless, for the purposes of this analysis, since the proposed development would affect the existing visual character or quality of the Project Site, its impact with respect to existing visual character is

considered potentially significant prior to mitigation. Implementation of Mitigation Measures B-11 through B-22 would reduce the Project's impact on visual character to a less than significant level.

Because the retaining walls would only be minimally visible from Mulholland Drive and San Feliciano Drive, the use of retaining walls would not substantially degrade the existing visual character or quality of the site and its surroundings. This impact would be less than significant.

The loss of views of the on-site oak woodland would substantially affect the existing visual character or quality of the Project Site; this impact is considered potentially significant prior to mitigation. Implementation of Mitigation Measures B-11 through B-20 would reduce the Project's impact with respect to views of the on-site oak woodland to a less than significant level.

CUMULATIVE IMPACTS

Development of the Proposed Project in conjunction with other anticipated growth in the general area is likely to result in the development of residential and commercial uses in accordance with the adopted Community Plan and existing zoning. The only specific cumulative development project that has been identified as being proposed within a 1.5-mile radius of the Project Site, the Clarendon Street Apartments, is located approximately 1.3 miles from the Project Site. Due to the distance of this site from the Proposed Project location, the cumulative project would not combine with the Proposed Project to result in the loss of scenic vistas, damage to scenic resources, alteration of existing visual character, or the creation of substantial light and/or glare. As such, with implementation of the mitigation measures identified in this Draft EIR for the Proposed Project, cumulative impacts related to aesthetics and views resulting from the concurrent development of the Project and future cumulative growth in the vicinity would be less than significant, and the Project's overall contribution would not be cumulatively considerable.

MITIGATION MEASURES/REGULATORY COMPLIANCE MEASURES/PROJECT DESIGN FEATURES

Project Design Features

The following project design feature provides detailed direction for the preparation and implementation of the Project Landscape Plan. Implementation of Project Design Feature B-1 would further reduce the Project's less than significant impact on scenic vistas.

- B-1** The Project Applicant shall prepare and implement a Landscape Plan. The Landscape Plan provides planting and maintenance guidance for common landscaped areas, slopes, and undeveloped building pads. The Project Applicant shall be responsible for the Plan's implementation until the individual homes are occupied by residents who will take over landscape

maintenance responsibilities. The Landscape Plan shall be subject to the review and approval by the Mulholland Scenic Parkway Specific Plan Design Review Board and the City of Los Angeles' Planning Department prior to issuance of the grading permit. To ensure its implementation, the Landscape Plan shall be incorporated into the Project's conditions of approval. Major features of the landscape plan shall include:

- 1) A listing of plant species appropriate for use for both temporary slope stabilization purposes and long-term landscaping designs for common slope and private yard areas. The plan shall emphasize the use of drought-tolerant, fire retardant, native plant species. Only non-invasive non-native plant species shall be included in the listing of acceptable planting materials. In addition, wherever practical, plants which are relatively pest resistant and which require a minimum of added nutrients shall be utilized in landscaping;
- 2) Retention of a landscape contractor thoroughly familiar with the provisions of the Landscape Plan for ongoing implementation of the Landscape Plan;
- 3) Preservation and protection of existing trees and shrubs, wherever possible. Procedures for the care and maintenance of native trees retained on the Project Site shall be specified. The Project Applicant shall provide protected tree maintenance information to the purchasers of individual homes within the Proposed Project; and
- 4) Utilization of a design that achieves the total screening of Project homes through the planting of new native trees and shrubs.

Light and glare impacts have been determined to be less than significant and mitigation measures are not required under CEQA. Nevertheless, the following project design features would further reduce the Project's less than significant artificial light impacts:

- B-2** Entrance and all forms of street lighting shall focus illumination downward and into the Project Site. A combination of shielding, screening, and directing the lighting away from off-site areas shall be utilized to minimize "spill-over" effects onto adjacent roadways, properties and open space areas. Wherever possible, lighting fixtures shall be located on the shielded side of the visual barriers.
- B-3** Lighting fixtures that cutoff light directed to the sky shall be installed in combination with an expanded tree canopy to minimize atmospheric light pollution.
- B-4** The use of exterior up-lighting fixtures for building facades and trees shall be prohibited. Only down-lighting for exterior-building mounted fixtures shall be permitted.

- B-5** Use of "glowing" fixtures that would be visible from existing communities or public roads shall be prohibited. A glowing fixture is a lantern style fixture, or any fixture that allows light through its vertical components.
- B-6** Exterior building finishes shall be non-reflective and use natural subdued tones.
- B-7** All roofs visible from Mulholland Highway shall be surfaced with non-reflective materials.

Regulatory Compliance Measures

The Proposed Project would have potentially significant impacts with respect to (1) scenic resources and (2) the existing visual character or quality of the site and its surroundings. The following requirements of the City of Los Angeles and Mulholland Scenic Parkway Specific Plan would reduce these potentially significant impacts on scenic resources to a less than significant level:

- B-8** Prior to the issuance of a grading permit or building permit, the Project Applicant shall submit a tree report and landscape plan prepared by a Municipal Code-designated tree expert as designated by City of Los Angeles Ordinance No. 177,404, for approval by the Mulholland Scenic Corridor Specific Plan Design Review Board, the City of Los Angeles' Planning Department and the Urban Forestry Division of the Bureau of Street Services.
- B-9** A minimum of two trees (a minimum of 36-inch box in size) shall be planted for each oak tree that is removed, and a minimum of two trees (a minimum of 15-gallon size) shall be planted for each protected species and native tree that is removed. The genera of the non-native replacement trees shall provide a minimum crown of 30 to 50 feet. The value of the protected species trees planted shall be in proportion to the value of the protected species trees removed per Ordinance 177,404, the Mulholland Scenic Parkway Specific Plan, and to the satisfaction of the Urban Forestry Division of the Bureau of Street Services.
- B-10** All work performed with respect to the Project's protected trees shall be in accordance with the City of Los Angeles' Protected Tree Ordinance, the Mulholland Scenic Parkway Specific Plan, and LAMC 46.00 et. seq.

Mitigation Measures

The following mitigation measures, recommended in the Horticultural Tree Report prepared for the Project (included in Appendix G), would reduce the impact to oak trees, as scenic resources, to a less than significant level:

- B-11** The replacement trees shall be planted in the newly landscaped areas of the Project.

- B-12** The preserved trees, especially the protected species trees, within 50 feet of the proposed construction areas shall be fenced with a temporary chain-link (or similar) protective fence at their driplines (or at the location of approved encroachment) prior to the start of any on-site grading. This fencing shall remain intact until the City of Los Angeles' Planning Department or Street Tree Division, Bureau of Street Maintenance allows it to be removed or relocated.
- B-13** All footing excavations within the driplines shall be dug by hand work only, to a maximum depth of 5 feet (or to a depth that CAL-OSHA, OSHA or local codes allow). Any excavation below the approved depth may be done with acceptable machinery. All footings within the preserved tree driplines shall be of "post type" rather than of "continuous type" to lessen potential root damage.
- B-14** No other on-site protected species trees shall be encroached upon within their driplines other than what is being requested.
- B-15** No over-excavation outside of any cut and/or fill slopes ("tops" or "toes") for the proposed construction shall occur within the dripline of any on-site oak trees, unless required by the Project's structural engineer.
- B-16** No landscape, irrigation lines, utility lines, and/or grade changes shall be designed and/or installed within the dripline of any protected trees, unless approved by the City of Los Angeles' Planning Department or Street Tree Division, Bureau of Street Maintenance.
- B-17** The bare areas within the driplines of any on-site or overhanging protected trees, or within 50 feet of approved grading/construction near protected trees shall be covered with an insect and disease free organic mulch (minimum depth of 2 inches thick and no closer than 6 inches from their trunks and extending to approximately 10 feet outside the dripline).
- B-18** Mature protected trees to be retained shall be examined by a qualified arborist prior to the start of construction. Some of the Project's saved protected trees are in need of minor dead wood removal. No major structural pruning shall be permitted. A qualified arborist shall complete all dead wood removal and/or pruning.
- B-19** Examination of the trees to be retained shall be performed monthly by a qualified arborist to ensure that they are being adequately protected and maintained. Prior to the completion of the Project, a qualified arborist shall certify in a "letter of compliance" that all concerned tree policies have been adhered to.

B-20 Copies of the Horticultural Tree Report for the Project, the City's Protected Tree ordinance, and the Mulholland Scenic Parkway Specific Plan shall be maintained on-site during all Project construction.

Potentially significant impacts to the existing visual character or quality of the site and its surroundings would be reduced to a less than significant level by implementation of Mitigation Measures B-10 through B-20. In addition, implementation of the following mitigation measures is required to reduce Project impacts on the existing visual character or quality of the site and its surroundings to a less than significant level:

B-21 All Project homes shall incorporate earth-tone palettes and non-reflective, more naturalistic building materials for exterior surfaces.

B-22 All public utilities shall be situated underground.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to scenic resources (including individual protected trees and the oak woodland) would be reduced to a less than significant level by the implementation of Mitigation Measures B-10 through B-20.

Impacts to the existing visual character or quality of the site and its surroundings would be reduced to a less than significant level by implementation of Mitigation Measures B-10 through B-22.

With implementation of the proposed landscape plan, impacts to scenic vistas would be less than significant. Implementation of Project Design Feature B-1 would further reduce the Project's less than significant impact.

Impacts from the Project's introduction of new sources of light on the Project Site would be less than significant. However, implementation of Project Design Features B-2 through B-5 would further reduce these less than significant impacts.

Impacts from the Project's introduction of new sources of glare on the Project Site would be less than significant. However, implementation of Project Design Features B-6 and B-7 would further reduce these impacts.

V. ENVIRONMENTAL IMPACT ANALYSIS

C. AIR QUALITY

This section examines the degree to which the Proposed Project may result in significant adverse changes to air quality. Both short-term construction emissions occurring from activities such as site grading and haul truck trips, as well as long-term effects related to the ongoing operation of the Proposed Project are discussed in this section. The analysis contained herein focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. “Emissions” refer to the actual quantity of pollutant measured in pounds per day. “Concentrations” refer to the amount of pollutant material per volumetric unit of air and are measured in parts per million (ppm) or micrograms per cubic meter (µg/m³).

The potential for the Proposed Project to conflict with or obstruct implementation of the applicable air quality plan, to violate an air quality standard or contribute substantially to an existing or projected air quality violation, to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, or to expose sensitive receptors to substantial pollutant concentrations are also discussed. Documents used in the preparation of this section include the South Coast Air Quality Management District (SCAQMD) *CEQA Air Quality Handbook*, the 2012 Air Quality Management Plan (AQMP), City of Los Angeles General Plan Air Quality Element, as well as federal and state regulations and guidelines. Appendix F contains the results of the air quality emissions modeling analysis that was performed to support the EIR analysis.

ENVIRONMENTAL SETTING

The Project Site is located within the South Coast Air Basin (Basin); named so because of its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. This area includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. The air quality within the Basin is primarily influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

Climate

The annual average temperature varies little throughout the Basin, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). Coastal areas have a more pronounced oceanic influence, and show less variability in annual minimum and maximum temperatures than inland areas. The community of Woodland Hills in the City of Los Angeles is located in the southwest San Fernando Valley of Los Angeles County, which is in the northwestern portion of the Basin. The climatological station closest to the Project Site that monitors temperature is the Canoga Park Pierce College station (WRCC 2015), which is located approximately five miles northeast of the Project Site. The annual average maximum temperature recorded from 1949 to 2015 at this station is 80.4°F, and the annual average minimum is 47.3°F. January and December are typically the coldest months in this area of the Basin.

Although the climate of the Basin can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of Basin climate. Humidity restricts visibility in the Basin. The annual average relative humidity is 71 percent along the coast and 59 percent inland. Because the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast.

The majority of annual rainfall in the Basin occurs between November and April. Summer rainfall is minimal and generally limited to scattered thundershowers in coastal regions and slightly heavier showers in the eastern portion of the Basin, along the coastal side of the mountains. Average rainfall measured at the Canoga Park Pierce College climatological station from 1981 to 2010 varied from 4.69 inches in February to 0.03 inches in July, with an average annual total of 18.37 inches. The influence of rainfall on the contaminant levels in the Basin is minimal.

The Basin experiences a persistent temperature inversion, which is characterized by increasing temperature with increasing altitude. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. The mixing height for this inversion structure is normally situated 1,000 to 1,500 feet above mean sea level.

The vertical dispersion of air contaminants in the Basin is also affected by wind conditions. The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are the lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas in the Basin are transported predominantly on-shore into Riverside and San Bernardino Counties. The Santa Ana winds, which are strong and dry north or northeasterly winds that occur during the fall and winter months, also disperses air contaminants in the Basin. The Santa Ana conditions tend to last for several days at a time.

Air Pollutants and Effects

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources are usually subject to a permit to operate from the SCAQMD, occur at specific identified locations, and are usually associated with manufacturing and industry. Examples of point sources are boilers or combustion equipment that produce electricity or generate heat, such as heating, ventilation, and air conditioning (HVAC) units. In contrast, area sources are widely distributed, produce many small emissions, and they do not require permits to operate from the SCAQMD. Examples of area sources include residential and

commercial water heaters, painting operations, portable generators, lawn mowers, agricultural fields, landfills, and consumer products, such as barbeque lighter fluid and hairspray, the area-wide use of which contributes to regional air pollution. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources are those that are legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, racecars, and construction vehicles.

Mobile sources account for the majority of the air pollutant emissions within the Basin. However, air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Both the federal and state governments have established ambient air quality standards for outdoor concentrations of specific pollutants, referred to as “criteria pollutants,” in order to protect public health. The national and state ambient air quality standards have been set at concentration levels to protect the most sensitive persons from illness or discomfort with a margin of safety. It is the responsibility of the SCAQMD to bring air quality within the Basin into attainment with the national and state ambient air quality standards, which are identified later in this EIR section.

The criteria pollutants for which federal and state standards have been promulgated and that are most relevant to air quality planning and regulation in the Basin are ozone, carbon monoxide, fine suspended particulate matter, nitrogen dioxide, sulfur dioxide, and lead. In addition, toxic air contaminants are of concern in the Basin. Each of these pollutants is briefly described below.

- *Ozone (O_3)* is a highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.
- *Carbon Monoxide (CO)* is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.
- *Respirable Particulate Matter (PM_{10})* and *Fine Particulate Matter ($PM_{2.5}$)* consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter,

respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.

- *Nitrogen dioxide (NO₂)* is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of nitrogen oxide compounds, NO₂ is the most abundant in the atmosphere. As ambient concentrations of NO₂ are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO₂ than those indicated by regional monitors.
- *Sulfur dioxide (SO₂)* is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When sulfur dioxide oxidizes in the atmosphere, it forms sulfates (SO₄). Collectively, these pollutants are referred to as sulfur oxides (SO_x).
- *Lead (Pb)* occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on road motor vehicles, so the majority of such combustion emissions are associated with off-road vehicles such as race cars. However, because it was emitted in large amounts from vehicles when leaded gasoline was used for on-road motor vehicles, lead is present in many urban soils and can get re-suspended in the air. Other sources of lead include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and the use of secondary lead smelters.
- *Toxic Air Contaminants (TAC)* refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. They include both organic and inorganic chemical substances that may be emitted from a variety of common sources including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. Toxic air contaminants are different than “criteria” pollutants in that ambient air quality standards have not been established for them, largely because there are hundreds of air toxics and their effects on health tend to be felt on a local scale rather than on a regional basis.

In addition, state standards have been promulgated for sulfates, hydrogen sulfide, and visibility reducing particles. The state also recognizes vinyl chloride as a TAC with an undetermined threshold level of exposure for adverse health effects. Discussion of these criteria pollutants, however, will be limited as

the Proposed Project is not expected to emit these pollutants. Vinyl chloride and hydrogen sulfide emissions are generally generated from mining, milling, refining, smelting, landfills, sewer plants, cement manufacturing, or the manufacturing or decomposition of organic matter. As the Proposed Project does not contain any of these uses, they need not be addressed further in this EIR. As to sulfate and visibility reducing particles, the state standards are not exceeded anywhere in the Basin; therefore, these pollutants are not relevant to air quality planning and regulation and need not be further addressed in this EIR.

Existing Regional Air Quality

Measurements of ambient concentrations of the criteria pollutants are used by the United States Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (ARB) to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and state standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in “attainment.” If the pollutant exceeds the standard, the area is classified as a “nonattainment” area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated “unclassified.”

The entire Basin is designated as an extreme nonattainment area for ozone by the U.S. EPA and a nonattainment area for PM_{2.5}. The area is designated as an attainment or unclassified area for NO₂, CO, and PM₁₀. The Basin is a state-level extreme nonattainment area for ozone, and is a nonattainment area for PM_{2.5} and PM₁₀. It is in attainment for the state CO standard, and it is in attainment of both the national and state ambient air quality standards for SO₂, lead, and NO₂.

The SCAQMD divides the Basin into 38 source receptor areas (SRAs) in which 40 monitoring stations operate to monitor concentrations of air pollutants in the region. The community of Woodland Hills within the City of Los Angeles is located within SRA 6, which covers the West San Fernando Valley. The ARB also collects ambient air quality data through a network of air monitoring stations throughout the state. These data are summarized annually and are published in the ARB’s California Air Quality Data Summaries. Table V.C-1, Summary of Ambient Air Quality in the Proposed Project Vicinity, identifies the national and state ambient air quality standards for the relevant air pollutants, along with the ambient pollutant concentrations that were measured at the Reseda monitoring station between 2011 and 2013.

According to the air quality data from the Reseda monitoring station shown in Table V.C-1, the national 8-hour ozone standard was exceeded a total of 60 days over the last three years within SRA 6, while the state 1-hour ozone standard was exceeded a total of 42 days over the last three years. The national 24-hour PM_{2.5} standard was exceeded four times over the last three years, and no national or state standards for CO or NO₂ have been exceeded over the last three years within SRA 6.

Existing Local Air Quality

The Project Site includes abandoned structures, trees, shrubs, low-lying weeds and grass, and vegetation that produce no meaningful anthropogenic emissions. As a result, it is assumed that the Project Site does not currently emit criteria pollutant emissions.

Table V.C-1
Summary of Ambient Air Quality in the Proposed Project Vicinity

Air Pollutants Monitored Within SRA 6 - West San Fernando Valley Area	Year		
	2011	2012	2013
Ozone (O₃)			
Maximum 1-hour concentration measured	0.130 ppm ^a	0.129 ppm	0.124 ppm
Number of days exceeding State 0.09 ppm 1-hour standard	17	18	7
Number of days exceeding national 0.075 ppm 8-hour standard	26	23	11
Fine Particulate Matter (PM_{2.5})			
Maximum 24-hour concentration measured	39.8 µg/m ³ , ^b	41.6 µg/m ³	41.8 µg/m ³
Number of days exceeding national 35.0 µg/m ³ 24-hour standard	1	2	1
Carbon Monoxide (CO)			
Maximum 8-hour concentration measured	2.8 ppm	2.8 ppm	2.3 ppm
Number of days exceeding State 9.0 ppm 8-hour standard	0	0	0
Nitrogen Dioxide (NO₂)			
Maximum 1-hour concentration measured	0.0561 ppm	0.0709 ppm	0.0582 ppm
Number of days exceeding State 0.25 ppm 1-hour standard	0	0	0
<i>a. ppm = parts by volume per million of air.</i> <i>b. µg/m³ = micrograms per cubic meter.</i>			
Source: SCAQMD annual monitoring data (www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year)			

Land uses surrounding the 6.2-acre Project Site include one- and two-story single-family homes to the north, east, and west, the Girard Reservoir and the City of Los Angeles Department of Water and Power Pumping Station to the northeast, a private parochial high school and convent to the southeast, and a two-story commercial office building with a surface parking lot and a small shopping center to the southwest. The City of Calabasas begins approximately 365 feet south of the Project Site, along Mulholland Highway. The private parochial high school, Louisville High School, and convent property houses multiple structures and contains a surface parking lot and tennis courts that parallel Mulholland Drive. The two-story commercial office building, called Mulholland Plaza, is located at the southwest corner of the intersection between Mulholland Drive and Mulholland Highway. The shopping center is located in the City of Calabasas adjacent to Mulholland Plaza, and consists of retail and commercial stores.

Motor vehicles are the primary source of pollutants in the Project Site vicinity. Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed “CO hotspots.” Chapter 5 of the SCAQMD’s *CEQA Air Quality Handbook* identifies CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots. The SCAQMD defines typical sensitive receptors as residences, schools, playgrounds, childcare centers, athletic facilities, hospitals, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

Existing Site Emissions

As discussed above, the Project Site is currently unoccupied and consists largely of trees, shrubs, and ground cover that do not emit any anthropogenic pollutants. As such, there are currently no sources of emissions at the project site.

Health Effects of Air Pollutants

Ozone

Individuals exercising outdoors, children and people with pre-existing lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible sub-groups for ozone effects. Short-term exposures (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated ozone levels are associated with increased school absences. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in high ozone communities.

Ozone exposure under exercising conditions is known to increase the severity of the above-mentioned observed responses. Animal studies suggest that exposures to a combination of pollutants that include ozone may be more toxic than exposure to ozone alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

Carbon Monoxide

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart.

Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.

Reduction in birth weight and impaired neurobehavioral development has been observed in animals chronically exposed to CO resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels. These include pre-term births and heart abnormalities. Additional research is needed to confirm these results.

Particulate Matter

A consistent correlation between elevated ambient fine particulate matter (PM₁₀ and PM_{2.5}) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in lifespan, and an increased mortality from lung cancer.

Daily fluctuations in fine particulate matter concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter.

The elderly, people with pre-existing respiratory or cardiovascular disease and children appear to be more susceptible to the effects of PM₁₀ and PM_{2.5}.

Nitrogen Dioxide

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO₂ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO₂ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

In animals, exposure to levels of NO₂ considerably higher than ambient concentrations results in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of ozone exposure increases when animals are exposed to a combination of O₃ and NO₂.

Sulfur Dioxide

A few minutes exposure to low levels of SO₂ can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO₂. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO₂.

Animal studies suggest that despite SO₂ being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO₂ levels. In these studies, efforts to separate the effects of SO₂ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Sulfates

Most of the health effects associated with fine particles and SO₂ at ambient levels are also associated with SO₄. Thus, both mortality and morbidity effects have been observed with an increase in ambient SO₄ concentrations. However, efforts to separate the effects of SO₄ from the effects of other pollutants have generally not been successful.

Clinical studies of asthmatics exposed to sulfuric acid suggest that adolescent asthmatics are possibly a subgroup susceptible to acid aerosol exposure. Animal studies suggest that acidic particles such as sulfuric acid aerosol and ammonium bisulfate are more toxic than non-acidic particles like ammonium sulfate. Whether the effects are attributable to acidity or to particles remains unresolved.

Lead

Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure.

Lead poisoning can cause anemia, lethargy, seizures and death. It appears that there are no direct effects of lead on the respiratory system. Lead can be stored in the bone from early-age environmental exposure, and elevated blood lead levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of lead because of previous environmental lead exposure of their mothers.

Toxic Air Contaminants

Toxic Air Contaminants (TACs) are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer). TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TACs (based on the statewide average). According to the California Air Resources Board (CARB), diesel exhaust is a complex mixture of gases, vapors and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State's Proposition 65 or under the federal Hazardous Air Pollutants programs. California has adopted a comprehensive diesel risk reduction program. The U.S. EPA has adopted low sulfur diesel fuel standards that will reduce diesel particulate matter substantially.

Regulatory Framework

Air quality in the United States is governed by the Federal Clean Air Act (CAA). In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). At the federal level, the CAA is administered by the U.S. EPA. In California, the CCAA is administered by the CARB at the State level and by the Air Quality Management Districts at the regional and local levels.

Air quality within the Basin is addressed through the efforts of various federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality within the Basin are discussed below.

Federal

U.S. EPA

The U.S. EPA is responsible for setting and enforcing the federal ambient air quality standards for atmospheric pollutants. National Ambient Air Quality Standards (NAAQS) have been established for seven major air pollutants: CO, NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, and Pb. The Clean Air Act requires U.S. EPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The national standards are summarized in Table V.C-2.

U.S. EPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The U.S. EPA also has jurisdiction over emissions sources outside state waters (outer continental shelf), and establishes various emissions standards for vehicles sold in states other than California.

As part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, State, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs.

State

CARB

The CARB, a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both state and federal air pollution control programs within California. In this

capacity, the CARB conducts research, sets state ambient air quality standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs.

CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The state standards are summarized in Table V.C-2.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment.

Table V.C-2
State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	/a/	0.075 ppm (147 µg/m ³)	Nonattainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Nonattainment	150 µg/m ³	Attainment
	Annual Arithmetic Mean	20 µg/m ³	Nonattainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Nonattainment
	Annual Arithmetic Mean	12 µg/m ³	Nonattainment	12 µg/m ³	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Maintenance
	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Maintenance

Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Unclassified/ Attainment
	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (188 µg/m ³)	Unclassified/ Attainment
Sulfur Dioxide (SO ₂)	24-hour	0.04 ppm (105 µg/m ³)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
Lead (Pb)	30-day average	1.5 µg/m ³	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Nonattainment
/a/ CARB has not determined 8-hour O ₃ attainment status. Source: CARB, Ambient Air Quality Standards, and attainment status, accessed April 30, 2015 (www.arb.ca.gov/desig/adm/adm.htm)					

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a council of governments for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. It is a regional planning agency and serves as a forum for regional issues relating to transportation, the economy and community development, and the environment.

Although the SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality. Specifically, SCAG prepares the transportation portion of the AQMP through the adoption of its Regional Transportation Plan (RTP). This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in State law.

SCAQMD

The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source

emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour PM_{2.5} strategy standard.

In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

Local

City of Los Angeles

Local jurisdictions, such as the City of Los Angeles, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City of Los Angeles is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

The City's General Plan includes an Air Quality Element that provides a policy framework that governs air quality planning within the City of Los Angeles. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air goals.

In 2006, the City released its *L.A. CEQA Thresholds Guide* that provides guidance in the preparation of environmental documents. This included a chapter focusing on air quality. While this document did not set new thresholds of significance for air quality, it did suggest a process for evaluating projects and attempted to standardize analyses through prescribed protocols.

ENVIRONMENTAL IMPACTS

Methodology

The analysis in this section focuses on the nature and magnitude of the change in the air quality environment due to implementation of the Proposed Project. Air pollutant emissions associated with the Project would result from operation of the proposed residential development and from Project-related traffic volumes. Construction activities would also generate emissions at the Project Site and on roadways resulting from construction-related traffic. The net increase in Project Site emissions generated by these activities and other secondary sources have been quantitatively estimated and compared to thresholds of significance recommended by the SCAQMD.

Construction Emissions

Construction emissions are calculated using the CalEEMod 2013.2.2 model by estimating the types and number of pieces of equipment that would be used to demolish existing structures, grade and excavate the project site, construct the proposed development, and plant new landscaping within the Project Site. Construction emissions are analyzed according to the thresholds established by the SCAQMD and published in the *CEQA Air Quality Handbook*. The construction activities associated with the Proposed Project would cause diesel emissions and would generate emissions of dust. Construction equipment within the Project Site that would generate criteria air pollutants could include excavators, graders, dump trucks, and loaders. Some of this equipment would be used during demolition and grading activities as well as when structures are constructed on the site. In addition, emissions during construction activities also include export truck trips offsite to remove debris and vegetation during the demolition phase. It is assumed that all of the construction equipment used would be diesel-powered.

Operational Emissions

Operational emissions associated with the Proposed Project were estimated using the CalEEMod 2013.2.2 model and information provided in the traffic study prepared for the Proposed Project. Operational emissions would be comprised of mobile source, area, and energy source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with operation of the Proposed Project. Area sources include fireplaces, landscape maintenance equipment, and other smaller sources of combustion emissions. Energy source emissions are primarily created by

natural gas consumption for space and water heating. To determine if an air quality impact would occur, the increase in emissions would be compared with the SCAQMD's recommended thresholds.

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant air quality impact may occur if the proposed project would result in any of the following conditions:

- (a) Conflict with or obstruct implementation of the applicable air quality plan;
- (b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- (c) 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 (including release in emissions which exceed quantitative thresholds for ozone precursors);
- (d) Expose sensitive receptors to substantial pollutant concentrations; or
- (e) Create objectionable odors affecting a substantial number of people.

As discussed in the Initial Study (see Appendix A to this Draft EIR), the Proposed Project would have no impact with respect to Threshold (e) listed above. Objectionable odors are typically associated with food related activities and industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements, as well as sewage treatment facilities and landfills. The Proposed Project, which consists of the development of 19 single-family homes on the Project Site, would not involve any elements related to these types of uses. Consequently, no significant impacts related to objectionable odors are anticipated from the Proposed Project. As such, no further analysis of this topic is required (see also Section IV.A of this Draft EIR).

The City released the *L.A. CEQA Thresholds Guide* in 2006. While the City has not adopted specific citywide significance thresholds for air quality, this document is used to help evaluate project impacts in concert with the SCAQMD's recommended thresholds of significance.

The SCAQMD's emission thresholds apply to all federally regulated air pollutants except lead, which is not exceeded in the Basin. As such, construction and operational emissions associated with the Proposed Project would be significant if they exceed the thresholds shown in Table V.C-3.

Table V.C-3
SCAQMD's Emission Thresholds of Significance

Pollutant	Construction		Operation	
	Regional Emissions (pounds/day)	Localized Emissions (pounds/day)	Regional Emissions (pounds/day)	Localized Emissions (pounds/day)
Carbon Monoxide (CO)	550	1,158	550	1,158
Sulfur Oxides (SO _x)	150	N/A	150	N/A
Particulate Matter (PM _{2.5})	55	7	55	2
Particulate Matter (PM ₁₀)	150	11	150	3
Nitrogen Oxides (NO _x)	100	221	55	221
Reactive Organic Gases (ROG)	75	N/A	55	N/A
<i>Source: SCAQMD CEQA Air Quality Handbook. Localized emissions thresholds based on 5-acre site with 25-meter distances to receptors in West San Fernando Valley source receptor area.</i>				

Carbon monoxide emissions from a project are significant if they cause CO concentrations at impacted locations to exceed a national or state standard or, in an area that already exceeds a standard, to increase CO concentrations by more than one part per million (ppm) averaged over one hour or 0.45 ppm averaged over eight hours.

In order to assess cumulative impacts, the SCAQMD recommends that projects be evaluated to determine whether they would be consistent with 2012 AQMP performance standards and project-specific emissions thresholds. In the case of the Proposed Project, air pollutant emissions would be considered to be cumulatively considerable if the new sources of emissions exceeded SCAQMD emissions thresholds or if the Proposed Project would be inconsistent with growth forecasts incorporated into the 2012 AQMP.

Project Impacts

AQMP

The proposed residential land use will neither conflict with the SCAQMD's 2012 AQMP nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by SCAG. Specifically, SCAG's growth forecasts from the 2012 RTP/SCS are largely built off local growth forecasts from local governments like the City of Los Angeles. The RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020.

The Project Site is located in the City's Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan area. The Community Plan implements land use standards of the General Plan Framework at the local level. The Proposed Project is consistent with the City's projected growth capacity for the Community Plan area, which accommodated a projected population of 191,892 persons and housing base of 87,187 units by 2010.¹ The City has not updated projections beyond 2010 for the Community Plan area.

As shown in Table V.C-4 the Project would develop 19 residential units in the City of Los Angeles and could add 42 residents to the Plan area, based on the City's projected household density in the Community Plan area. This would marginally increase population in the Basin and represent about 0.18 percent of household growth projected from 2000-2010 in the Community Plan area. The Project site is classified as "Low Residential" in the Community Plan, a zoning classification that allows residential uses. As such, the RTP/SCS' assumptions about growth in the City likely accommodate housing and population growth on this site. As such, the Project does not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

Table V.C-4
Project Consistency with Air Quality Management Plan's Growth Forecast

Forecast Year	Population in City of Los Angeles	Proposed Project	Households in City of Los Angeles	Proposed Project	Employment in City of Los Angeles	Proposed Project
2008	3,770,500	42	1,309,900	19	35,900	0
2020	3,991,700		1,455,700		37,100	
2035	4,320,600		1,626,600		38,600	
Source: DKA Planning, 2015 based on SCAG 2012 Regional Transportation Plan Growth Forecast. Assumes 2.2 persons per household per Community Plan in 2010.						

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As illustrated in Table V.C-5, the Proposed Project is consistent with the applicable policies in the General Plan. As such, the Proposed Project's impact would be considered less than significant.

¹ City of Los Angeles, Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan, www.cityplanning.lacity.org/complan/pdf/cpkcptxt.pdf. 1999.

Table V.C-5
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	Consistent. The Proposed Project would minimize particulate emissions during construction through best practices required by SCAQMD Rule 403 (Fugitive Dust) and/or mitigation measures.
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Consistent. The Proposed Project would minimize particulate emissions from unpaved facilities through best practices required by SCAQMD Rule 403 (Fugitive Dust) and/or mitigation measures.
Policy 3.2.1. Manage traffic congestion during peak hours.	Consistent. The Proposed Project does not create any significant traffic impacts.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	Consistent. The Proposed Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Los Angeles County Metropolitan Transportation Authority, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	Consistent. The Proposed Project would be entitled and environmentally cleared at the local level.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	Consistent. The Proposed Project would be infill development that would provide residents with proximate access to jobs, shopping, and other uses.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. The Proposed Project would be located in an urbanized area with infrastructure to facilitate alternative transportation modes, including proximity to bus routes operated by the Los Angeles County Metropolitan Transportation Authority (i.e., Route 169) and Class II bicycle lanes on Mulholland Drive.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The Proposed Project's air quality impacts will be analyzed and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent. The Proposed Project would be located in an urbanized area with infrastructure to facilitate alternative transportation modes, including proximity to bus routes operated by the Los Angeles County Metropolitan Transportation Authority (i.e., Route 169) and Class II bicycle lanes on Mulholland Drive.
Policy 5.3.1. Support the development and use of equipment	Consistent. The Proposed Project would be

Strategy	Project Consistency
powered by electric of low-emitting fuels.	designed to meet the applicable requirements of the State's Green Building Standards Code and the City of Los Angeles' Green Building Code.

Construction Impacts

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2013.2.2 model based on a construction schedule of 26 months. Key assumptions include 40 tons of material exported during site preparation, import of 4,200 cubic yards of soils during grading; site preparation (1.5 months), a grading phase (four months), a construction phase (18 months), a paving phase (one month), and an architectural coatings phase (six months).

As shown in Table V.C-6, construction of the Proposed Project would produce VOC, CO, SO_x, PM₁₀ and PM_{2.5} emissions that do not exceed the SCAQMD's regional thresholds. However, NO_x emissions during the grading phase would exceed the regional threshold for this ozone precursor. As a result, construction of the Proposed Project could contribute substantially to an existing violation of air quality standards for the regional pollutant ozone. This impact is considered significant but capable of being mitigated.

**Table V.C-6
Estimated Daily Construction Emissions (Unmitigated)**

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site Preparation						
On-Site Emissions	8	91	63	<1	23	14
Off-Site Emissions	<1	1	1	<1	<1	<1
Total Emissions	8	92	64	<1	23	14
Grading						
On-Site Emissions	16	170	94	<1	15	12
Off-Site Emissions	<1	2	3	<1	<1	<1
Total Emissions	16	172	97	<1	15	12
Building Construction						

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
On-Site Emissions	5	39	27	<1	3	3
Off-Site Emissions	<1	1	5	<1	1	<1
Total Emissions	5	40	32	<1	4	3
Paving						
On-Site Emissions	4	40	27	<1	2	2
Off-Site Emissions	<1	1	4	<1	1	<1
Total Emissions	4	41	31	<1	3	2
Architectural Coatings						
On-Site Emissions	4	10	8	<1	1	1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	4	10	8	<1	1	1
Maximum Regional Total	16	172	97	<1	23	14
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	Yes	No	No	No	No
Maximum Localized Total	16	170	94	<1	23	14
Localized Significance Threshold	--	221	1,158	--	11	7
Exceed Threshold?	No	No	No	No	Yes	Yes
Source: DKA Planning, 2015 based on CalEEMod 2013.2.2 model runs. LST analyses based on 6-acre site with 25-meter distances to receptors in West San Fernando Valley source receptor area.						

In terms of local air quality, the Proposed Project would produce significant emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO₂ and CO during the construction phase. However, construction activities could produce PM₁₀ and PM_{2.5} emissions that exceed localized thresholds recommended by the SCAQMD, primarily from vehicle exhaust and fugitive dust emissions from off-road construction vehicles during the site preparation and grading phases. As a result, construction impacts on localized air quality are considered significant but capable of being mitigated.

Operational Impacts

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Site after occupation. Stationary area source emissions would be generated

by the consumption of natural gas for space and water heating devices, and the operation of landscape maintenance equipment. Mobile emissions would be generated by the motor vehicles traveling to and from the site.

The Proposed Project would also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Proposed Project could add up to 181 net vehicle trips to and from the Project Site on a peak weekday at the start of operations in 2018.² Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_x, CO, PM₁₀ and PM_{2.5} emissions, as shown in Table V.C-7. As a result, the Proposed Project's operational impacts on regional air quality are considered less than significant.

With regard to localized air quality impacts, the Proposed Project would emit minimal emissions of NO₂, CO, PM₁₀, and PM_{2.5} from area and energy sources on-site. As shown in Table V.C-7, these localized emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. The Proposed Project's operational impacts on localized air quality are therefore considered less than significant.

Table V.C-7
Estimated Daily Operations Emissions (Unmitigated)

Emission Source	Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	2	<1	2	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	2	8	<1	1	<1
Net Regional Total	2	2	9	<1	1	<1
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	2	<1	2	<1	<1	<1
Localized Significance Threshold	-	221	1,158	-	3	2
Exceed Threshold?	N/A	No	No	N/A	No	No

² Crain & Associates, Inc., *Traffic Impact Study for Proposed Residential Development at 22255 Mulholland Drive, Woodland Hills, City of Los Angeles*; April 2015.

Source: DKA Planning 2015 based on CalEEMod 2013.2.2 model runs. LST analyses based on 6-acre site with 25-meter distances to receptors in West San Fernando Valley source receptor area.

Local CO Concentrations

Long-term operations of the Proposed Project would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the area in which the Project Site is located. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.

Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.³ Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. Project-generated traffic volumes under either the existing condition or 2018 horizon scenario would not significantly impact traffic levels of service at the five intersections studied in the vicinity of the Project Site.⁴ In addition, the Proposed Project would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow.

CUMULATIVE IMPACTS

The geographic context for the air quality cumulative impacts is SRA 6 of the Basin, which covers the West San Fernando Valley area. The analysis accounts for all anticipated cumulative growth within this geographic area, including ambient growth. The significance of cumulative air quality impacts is typically determined according to the project methodology employed by the SCAQMD.

AQMP Consistency

Cumulative development is not expected to result in a significant impact in terms of conflicting with, or obstructing implementation of, the 2012 AQMP. As discussed previously, growth considered to be

³ Caltrans, *Transportation Project-Level Carbon Monoxide Protocol*, updated October 13, 2010.

⁴ Crain & Associates, Inc., *Traffic Impact Study for Proposed Residential Development at 22255 Mulholland Drive, Woodland Hills, City of Los Angeles*; April 2015.

consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified in the 2012 RTP/SCS, implementation of the AQMP will not be obstructed by such growth. This is considered to not be cumulatively considerable. In addition, as discussed previously, the population growth resulting from the Proposed Project would be consistent with the growth projections of the AQMP. Therefore, the Project's contribution to the cumulative impact to the AQMP would not be cumulatively considerable and, therefore, would be less than significant.

Construction Impacts

Construction of the Proposed Project would contribute significantly to cumulative emissions of pollutants for any non-attainment pollutants prior to implementation of mitigation measures. For regional ozone precursors, the Proposed Project would exceed SCAQMD mass emission thresholds for the ozone precursor NO_x during construction. As such, the Project's impact on cumulative ozone precursor emissions would be considered significant but capable of being mitigated.

When considering local impacts, the Proposed Project would exceed the SCAQMD's PM₁₀ and PM_{2.5} Localized Significance Thresholds (LST). The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting LST mass emissions thresholds that generally double with every doubling of distance. Cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. However, the only potential cumulative development project within the general vicinity of the Project Site is located 1.3 miles to the north, which is too great a distance to be considered likely to generate cumulative construction air quality impacts in concert with the Proposed Project. As such, the cumulative impact of the Proposed Project and other construction projects on local sensitive receptors would be considered significant but capable of being mitigated.

Operational Impacts

As for cumulative operational impacts, the proposed land use would not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the Proposed Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in Table V.C-7, the Project's impacts on cumulative emissions of non-attainment pollutants is not considered cumulatively considerable. The Proposed Project is a residential project that does not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM₁₀ and PM_{2.5} would be minimal. Similarly, existing land uses in the area include residential and commercial land uses that do not produce substantial emissions of localized nonattainment pollutants.

MITIGATION MEASURES/REGULATORY COMPLIANCE MEASURES

Project air quality impacts with respect to short-term construction activities would be significant. Mitigation Measures C-1 through C-3 call for the use of readily available construction equipment that uses EPA-certified Tier 3 engines to reduce combustion-related PM₁₀ and PM_{2.5} emissions. Regulatory Compliance Measure C-4 addresses fugitive dust emissions of PM₁₀ and PM_{2.5} that would be regulated by SCAQMD Rule 403, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. It should be noted that the emissions shown in Table V.C-6 conservatively do not assume the application of BACMs to control fugitive dust.

Mitigation Measures

- C-1** All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 3 emission standards, where available, to reduce NO_x, PM₁₀, and PM_{2.5} emissions at the Project Site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- C-2** The use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) shall be required. If the City determines that 2010 model year or newer diesel trucks cannot be obtained, the City shall require trucks that meet U.S. EPA 2007 model year NO_x emissions requirements in their place.
- C-3** At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided to the City.

Regulatory Compliance Measures

- C-4** Construction activities shall comply with SCAQMD Rule 403, including the following measures:
- Apply water to disturbed areas of the site three times a day.
 - Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes.
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to dust/particulate matter generation.

- Limit soil disturbance to the amounts analyzed in the Final EIR.
- All materials transported off-site shall be securely covered. □
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less. □

LEVEL OF SIGNIFICANCE AFTER MITIGATION

As shown in Table V.C-8, implementation of Mitigation Measures C-1 through C-3 and compliance with Regulatory Compliance Measure C-4 would substantially reduce total NO_x emissions during the grading and other phases of construction that involve use of off-road diesel-fueled construction equipment. These measures would also substantially reduce on-site PM₁₀ and PM_{2.5} emissions during the construction process, particularly during the site preparation and grading phases. As a result, construction of the Proposed Project is not expected to produce any local violation of air quality standards or contribute substantially to an existing or projected air quality violation and Proposed Project impacts would be reduced to a less than significant level.

Table V.C-8
Estimated Daily Construction Emissions (Mitigated)

Construction Phase	(a) Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site Preparation						
On-Site Emissions	5	66	61	<1	10	7
Off-Site Emissions	<1	1	1	<1	<1	<1
Total Emissions	5	67	62	<1	10	7
Grading						
On-Site Emissions	5	83	95	<1	6	5
Off-Site Emissions	<1	2	3	<1	<1	<1
Total Emissions	5	85	98	<1	6	5
Building Construction						
On-Site Emissions	2	27	26	<1	2	2
Off-Site Emissions	<1	1	5	<1	<1	<1
Total Emissions	2	28	31	<1	2	2
Paving						

Construction Phase	(a) Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
On-Site Emissions	2	29	27	<1	2	2
Off-Site Emissions	<1	1	4	<1	<1	<1
Total Emissions	2	30	31	<1	2	2
Architectural Coatings						
On-Site Emissions	4	6	8	<1	<1	<1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	4	6	8	<1	<1	<1
Maximum Regional Total	5	85	98	<1	10	7
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	5	83	95	<1	10	7
Localized Significance Threshold	--	221	1,158	--	11	7
Exceed Threshold?	No	No	No	No	No	No
Source: DKA Planning, 2015 based on CalEEMod 2013.2.2 model runs. LST analyses based on 6-acre site with 25-meter distances to receptors in West San Fernando Valley source receptor area.						

V. ENVIRONMENTAL IMPACT ANALYSIS

D. BIOLOGICAL RESOURCES

INTRODUCTION

This section of the Draft Environmental Impact Report (DEIR) provides a description of the biological resources on the Project Site, information on regulations that serve to protect sensitive resources, an assessment of the potential impacts of the Proposed Project, and recommended measures to mitigate potentially significant impacts on sensitive resources. Various technical reports were reviewed and prepared to analyze the potential biological resources impacts associated with the Project. These technical reports are summarized below and are included in the Appendix G of this DEIR.

BACKGROUND AND STUDY METHODS

An assessment of biological resources within the Project Site was conducted by a consulting project biologist, TeraCor, in order to complete a *General Biological Assessment Report* for the Project Site (see Appendix G). This biological assessment involved a field survey of the Project Site to observe habitat types and conditions present on-site, as well as a review of existing biological information for the Project Site and pertinent scientific literature, consisting of the following:

- California Department of Fish and Wildlife's (CDFWs) *List of Vegetation Alliances and Associations*, dated September 2010.
- The California Natural Diversity Database (CNDDDB) and other well-known publications documenting historical records of species occurrences in the project area vicinity;
- The USGS quadrangle map for the Canoga Park quadrangle;
- A color aerial photograph of the site taken in 2004;
- The *Geologic and Soils Engineering Exploration* report prepared by The J. Byer Group, Inc. (March 22, 2005);
- The *Horticultural Tree Report Proposed Residential 22255 Mulholland Drive, Los Angeles, California (Project No. 504-1c-06)* prepared by Trees, etc. (September 21, 2009); and
- Tree Appraisals and Preservation Review Memo prepared by Paul A. Lewis Landscape Architect, January 12, 2015.

The *General Biological Assessment Report* prepared by TeraCor in August of 2015 provides general information on the potential presence of sensitive species and habitats. The biological assessment is not an official protocol-level survey for listed species. The biological assessment was based on information

available at the time of the study and on conditions that were observed on-site at the Project Site during reconnaissance surveys.

Literature reviewed in determining community names and vegetation associations and descriptions for the project area included: *The Jepson Manual: Higher Plants of California*¹, *Preliminary Descriptions of the Terrestrial Natural Communities of California*², and *A Manual of California Vegetation*³. Vegetation communities were field-mapped during the site reconnaissance surveys conducted on January 21 and February 12, 2006 by TeraCor. An updated field survey was conducted on May 19, 2015, and a follow-up mapping exercise was performed on July 10, 2015. When plant community conditions on the ground were too mixed or too small to be mapped, these areas were classified by combining community types on the vegetation map.

REGULATORY FRAMEWORK

Federal

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) defines an endangered species as “any species that is in danger of extinction throughout all or a significant portion of its range.” Threatened species are defined as “any species which is likely to become an endangered species in the foreseeable future throughout all or significant portions of its range.” The Sacramento, California United States Fish and Wildlife Service (USFWS) Field Office describes Federal Species of Concern (FSC) as “a sensitive species that has not been listed, proposed for listing, or placed in candidate status.” The FSC receives no legal protection and use of the term does not necessarily mean the species will eventually be proposed for listing as a threatened or endangered species. The Federal listing status is as follows:

FE	Federally listed as Endangered
FT	Federally listed as Threatened
FPT	Federally Proposed as Threatened
FPE	Federally Proposed as Endangered
FPD	Federally Proposed for delisting
FC	Federal Candidate Species
FSC	Federal Species of Concern

¹ Hickman, J.C., ed. 1993. *The Jepson Manual: Higher Plants of California*. U.C. Press, 1400 pages.

² Holland, R. F. 1986. *Preliminary Descriptions of the Terrestrial Natural Communities of California*. Prepared for the California Department of Fish and Game, Sacramento, California

³ Sawyer, J.O. and T. Keeler-Wolf. 1995. *A Manual of California Vegetation*. California Native Plant Society, 471 pages.

Clean Water Act

The U.S. Army Corps of Engineers (Corps) regulates “Waters of the United States” under Section 404 of the Clean Water Act (CWA). “Waters of the U.S.” are defined broadly as waters susceptible to use in commerce, including interstate waters and wetlands, all other waters (e.g., intrastate waterbodies, including wetlands), and their tributaries (33 CFR 328.3). Potential wetland areas, according to the three criteria used to delineate wetlands stated in the Corps of Engineers Wetlands Delineation Manual (1987), are identified by the presence of (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. Areas that are inundated for sufficient duration and depth to exclude growth of hydrophytic vegetation are subject to Section 404 jurisdiction as “other waters” and are often characterized by an ordinary high water line (OHW). Other waters, for example, generally include lakes, rivers, and streams. The placement of fill material into “Waters of the U.S.”, including wetlands, generally requires an individual or Nation Wide Permit (NWP) from the Corps under Section 404 of the CWA. The State also regulates “waters of the state” under Section 401 of the Clean Water Act (see discussion of “State” regulations below).

*State**California Endangered Species Act*

The California Environmental Species Act (CESA) defines an endangered species as “a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.” The CESA defines a threatened species as “a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species.” Candidate species are defined as “a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list.” Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike FESA, CESA does not include listing provisions for invertebrate species. The State listing status is as follows:

SE	State listed as Endangered
ST	State listed as Threatened
SR	State listed as Rare (Plants only)
CSC	California Species of Special Concern
SFP	Fully Protected
SCE	State Candidate for Endangered
SCT	State Candidate for Threatened
Special Animal	CNDDB Special Animal

“Special Animal” is a general term that refers to all of the taxa the CNDDDB is interested in tracking, regardless of their legal protection status.

California Fish and Game Code 3503

California Fish and Game Code 3503, 3503.5, and 3512 prohibit take of birds and active nests. Any activity, such as grading or grubbing for construction of the Project Site, that results in destruction of one or more active nests of native birds would entail a violation of the Fish and Game Code. Construction activities that result in abandonment of an active bird nest in areas adjacent to the disturbance may also violate sections of the Fish and Game Code.

California Environmental Quality Act

Plant species which may not be listed as endangered, threatened, candidate, or proposed species under FESA or CESA, but are still considered rare, are generally assigned a rarity code by the California Native Plant Society (CNPS). The CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in California. CNPS has compiled an inventory comprised of the information focusing on the geographic distribution and qualitative characterization of Rare, Threatened, or Endangered vascular plant species of California. The list serves as the candidate list for listing as Threatened and Endangered by the California Department of Fish and Game (CDFG). The CNPS five categories of rarity are summarized in Table V.D-1 (Summary of CNPS Lists 1, 2, 3, and 4). Under CEQA, impacts analyses are mandatory for List 1 and 2 species, but not for all List 3 and 4 species as some do not meet the definitions of the Federal Native Plant Protection Act or the California Endangered Species Act; however, List 3 and 4 impacts to these species are generally considered in most CEQA analyses and are recommended by CNPS⁴.

⁴ California Native Plant Society. 2001. *Inventory of Rare and Endangered Plants of California (sixth edition)*. Rare Plant Scientific Advisory Committee, David P. Tibor, Convening Editor. California Native Plant Society. Sacramento, CA. x + 388pp.

**Table V.D-1
Summary of CNPS Lists 1, 2, 3, and 4**

CNPS List	Comments
List 1A – Presumed Extinct in California	Thought to be extinct in California based on a lack of observation or detection for many years.
List 1B – Rare or Endangered in California and Elsewhere	Species generally rare throughout their range that are also judged to be vulnerable to other threats such as declining habitat.
List 2 – Rare or Endangered in California, More Common Elsewhere	Species rare in California but more common outside of California.
List 3 – Need More Information	Species that are thought to be rare or in decline, but CNPS lacks the information needed to assign to the appropriate list. In most instances, the extent of surveys for these species is not sufficient to allow CNPS to accurately assess whether these species should be assigned to a specific list. In addition, many of the List 3 species have associated taxonomic problems such that the validity of their current taxonomy is unclear.
List 4 – Plants of Limited Distribution	Species that are currently thought to be limited in distribution or range whose vulnerability or susceptibility to threat is currently low. In some cases, as noted above for List 3 species above, CNPS lacks survey data to accurately determine status in California. Many species have been placed on List 4 in previous editions of the “Inventory” and have been removed as survey data has indicated that the species are more common than previously thought. CNPS recommends that species currently included on this list should be monitored to ensure that future substantial declines are minimized.

CDFG maintains the CNDDDB, which is a program that inventories the status and locations of rare plants and animals in California. Each rare species or plant community is assigned an “element ranking” in the CNDDDB which quantifies and qualifies the rarity of each species/community within its global and state range. The CNDDDB gives five categories of rarity for each species’ global and state range⁵; these are summarized in Table V.D-2. All federal and state listed species are assigned a ranking; however, even non-listed species (such as Species of Concern, Special Animals, or plants on the CNPS list) are assigned an element ranking by CDFG for the CNDDDB. Impacts to species which are assigned an element ranking in the CNDDDB are considered under CEQA.

⁵ California Department of Fish and Game. 2006. *Special Animals (824 taxa)*. Biogeographic Data Branch, California Natural Diversity Database. February 2006.

**Table V.D-2
Summary of CNDDDB Element Ranking Codes**

Rank	Definition
Global Ranking*	
G1	Extremely endangered: less than 6 viable element occurrences (EOs) OR less than 1,000 individuals OR less than 2,000 acres
G2	Endangered: 6-20 EOs OR 1,000-3,000 individuals OR 2,000-10,000 acres
G3	Restricted range, rare: 21-80 EOs OR 3,000-10,000 individuals OR 10,000-50,000 acres
G4	Apparently secure; some factors exist to cause some concern such as narrow habitat or continued threats
G5	Demonstrably secure; commonly found throughout its historic range
State Ranking	
S1 – S5	Same as for Global Ranking, except that the rank is a reflection of the element throughout its state range, and a <i>Threat Rank</i> is attached (defined below)
.1	Very threatened
.2	Threatened
.3	No current threats known
*Subspecies receive a T-rank attached to the G-rank. A T-rank reflects the global situation of just that subspecies and not for the entire species; however, the rank values have the same definition.	

Waters of the State – Porter Cologne Act and CWA Section 401

“Waters of the State” are defined by the Porter-Cologne Act as “any surface water or groundwater, including saline waters, within the boundaries of the state.” The RWQCB protects all waters in its regulatory scope, but has special responsibility for isolated wetlands and headwaters. These waterbodies have high resource value, are vulnerable to filling, and are not systematically protected by other programs. RWQCB jurisdiction includes “isolated” wetlands and waters that may not be regulated by the Corps under Section 404. “Waters of the State” are regulated by the RWQCB under the State Water Quality Certification Program which regulates discharges of fill and dredged material under Section 401 of the CWA and the Porter-Cologne Water Quality Control Act. Projects that require a Corps permit, or fall under other federal jurisdiction, and have the potential to impact “Waters of the State,” are required to comply with the terms of the Water Quality Certification determination. If a Proposed Project does not require a federal permit, but does involve dredge or fill activities that may result in a discharge to “Waters of the State,” the RWQCB has the option to regulate the dredge and fill activities under its state authority in the form of Waste Discharge Requirements or Certification of Waste Discharge Requirements.

Streams, Lakes, and Riparian Habitat – Fish and Game Code Section 1600-1616

Streams and lakes, as habitat for fish and wildlife species, are subject to jurisdiction by the CDFG under Sections 1600-1616 of the State Fish and Game Code. Alterations to or work within or adjacent to streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement. The term stream, which includes creeks and rivers, is defined in the California Code of Regulations (CCR) as follows: “a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation” (14 CCR 1.72). In addition, the term stream can

include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife.⁶ Riparian is defined as, “on, or pertaining to, the banks of a stream;” therefore, riparian vegetation is defined as, “vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself.”⁷ Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from CDFG.

Local

Mulholland Scenic Parkway Specific Plan

The Project Site lies within the Mulholland Scenic Parkway Specific Plan (“Specific Plan”) area, which is comprised of Mulholland Drive right-of-way, inner corridor, outer corridor and the institutional use corridor. The Project Site is located within 500 feet of the Mulholland Scenic Parkway right-of-way, which is referred to as the Inner Corridor. The Specific Plan is intended to preserve, protect, and enhance the unique natural and cultural resources in the plan area. To accomplish these goals, the plan undertakes to provide that design and placement of buildings and other improvements preserves, complements, and/or enhances views; minimizes grading; and assures that graded slopes will have a natural appearance. Additionally, the Specific Plan seeks to preserve the natural appearance compatible with the characteristics of the Santa Monica Mountains, including the following environmental resources: prominent ridges, streams, parklands, and oak trees.

City of Los Angeles Protected Tree Ordinance

In April 2006, the City of Los Angeles’ Oak Tree Ordinance was amended to become the “Protected Tree Ordinance.” It assures the protection and regulates the removal of four species of native trees, specifically all native oaks (*Quercus* sp., with the exception of *Quercus dumosa*, aka *Q. berberidifolia*, scrub oak), Southern California black walnut (*Juglans californica*), Western (California) Sycamore (*Platanus racemosa*), and California bay laurel (*Umbellularia californica*).

Ordinance 177,404 provides that a protected species tree cannot be removed or relocated without first obtaining a permit from the Board of Public Works. The application for the permit must indicate the location of each protected species tree in the development area proposed to be retained, relocated or removed. Further, the Ordinance requires that for each protected species tree removed, a minimum of two trees of the same species (minimum 15-gallon size) shall be planted and that the size and number of the replacement trees shall approximate the value of the trees to be replaced.

⁶ California Department of Fish and Game. Environmental Services Division (ESD). 1994. *A Field Guide to Lake and Streambed Alteration Agreements, Sections 1600-1607, California Fish and Game Code.*

⁷ *Et al.*

In addition, because the Project Site is within the Mulholland Scenic Parkway Specific Plan area, the Specific Plan requires that a minimum of two oak trees (minimum of 36-inch box size) are to be planted for each one that is removed, any native tree removed must be replaced at a two for one ratio (minimum of 15-gallon size), and any non-native tree removed must be replaced at a one for one ratio (minimum of 15-gallon size). Further, a bond must be posted to guarantee the survival of trees which would be maintained, replaced or relocated to assure the existence of continuously living trees for a minimum of three years from the date the bond was posted or the trees were replaced or relocated.

ENVIRONMENTAL SETTING

The 6.19-acre Project Site is generally located in the foothills and north slopes of the Santa Monica Mountains, in the City of Los Angeles within the community of Woodland Hills. The Project Site is located on the northeast corner of Mulholland Drive and San Feliciano Drive. The site is specifically located in Section 24 of Township 1 North, Range 17 West of the Canoga Park 7.5-minute USGS topographic quadrangle, which depicts a USGS-designated blue line intermittent stream on-site. The Girard Reservoir (drained in 1989 and currently empty) is adjacent to and north of the Project Site.

The Project Site is situated at the lower transition zone between the Santa Monica Mountains and the San Fernando Valley. Generally, hilly terrain is present both on-site and in the general vicinity. Topography on-site ranges from gently-sloping in lower areas to hilly in the western and eastern central portions. Elevation on-site ranges from approximately 1,000 feet above mean sea level (msl) at the northern edge to approximately 1,048 feet above msl at the southwestern edge of the subject site.

The soils on-site generally consist of fill, alluvium, and bedrock⁸. The fill, which blankets the majority of the site, generally consists of uncompacted silty sand associated with previous grading efforts. Natural alluvium underlies the majority of the western and eastern portions of the subject site, and consists of silty sand, clayey sand, and sand which ranges from moist to saturated. Bedrock is present in the southern portion of the Project Site and is comprised of siltstone and sandstone mapped as part of the Modelo Formation⁹.

The Project Site, formerly a residential equestrian estate, is in various states of disrepair. Though there are disturbances throughout the site, the Project Site has not been substantially graded and substrates appeared to be relatively natural. The estate was developed within a coast live oak woodland, much of which remains on the site. Understory elements of the oak woodland are absent and have probably been removed over many years of residential/equestrian use. Natural understory components of the Project Site have been replaced with non-native grassland in the western half of the site and ornamental trees and typical residential landscaping in the approximate eastern half of the Project Site. One small knoll at the west edge of the site remains vegetated with mixed native grassland and coastal sage scrub elements.

⁸ The J. Byer Group, Inc. 2005. *Geologic and Soils Engineering Exploration*. March 22, 2005.

⁹ Dibblee, T.W. 1992. *Geologic Map of the Topanga and Canoga Park (South 1/2) Quadrangles*.

Vegetation and Plant Communities

Five vegetation communities are present on-site. Coast live oak forest/woodland and non-native grassland are the dominant types on-site. Smaller areas of coast live oak woodland/ornamental, mixed coastal sage scrub with purple needlegrass, and willow scrub are also present. These vegetation communities are described below and presented in Figure V.D-1.

Coast Live Oak Woodland

Coast live oak woodland (CLO) is located throughout the Project Site in fairly decent formations or cells. This vegetation community type is dominated by one tree species, coast live oak (*Quercus agrifolia*), and is comprised of mainly mature trees. The understory component is non-native grassland. The Project Site contains 155 protected coast live oak trees, according to the *Horticultural Tree Report* for the Project Site, which is included in Appendix G to this Draft EIR.

Mixed Coastal Sage Scrub with Purple Needle Grass

Remnant coastal sage scrub (CSS) mixed with purple needlegrass (*Nasella pulchra*), a native bunchgrass, is present on-site and limited to a very small knoll located in western portion of the Project Site along San



Source: TeraCor Resource Management, 2015.

Feliciano Drive. The CSS is comprised of a few shrubs of Menzie's goldenbush (*Isocoma menziesii*) and Palmer's goldenbush (*Ericameria palmeri*), as well as deerweed (*Lotus scoparius*) and California cudweed (*Gnaphalium californicum*). Purple needlegrass, a native bunchgrass, is also intermixed with the CSS in this area.

Non-native Grassland

Non-native grassland (NNG) mapped on the Project Site contained various species of grasses, including ripgut brome (*Bromus diandrus*), foxtail chess (*Bromus madritensis* ssp. *rubens*), and barley (*Hordeum* sp.). Other non-native species detected within the NNG on-site consisted of horehound (*Marrubium vulgare*), London rocket (*Sisymbrium irio*), and prickly sow thistle (*Sonchus asper*). Habitat values were moderately low in non-native grassland areas. Isolated patches of NNG provide little value to wildlife as compared to naturally-occurring scrub and native grassland systems.

Coast Live Oak Woodland/Ornamental

Ornamental species were observed in close proximity to the home and other structures on-site and consists of various species including Mexican fan palm (*Washingtonia robusta*), bottle tree (*Brachychiton populneus*), and fig tree (*Ficus carica*). A complete inventory of ornamental tree species on the Project Site is depicted in the *Horticultural Tree Report* for the Project Site. The non-native ornamental vegetation is considered to be low in ecological value to wildlife due to 1) displacement of native plant species, 2) alleopathic suppression of understory plants, and 3) lowered potential for utilization by wildlife for cover and foraging.

Blue Elderberry Stand/Elderberry Savannah

A small blue elderberry stand is located at the bottom of a slope in the central portion of the property. This stand is comprised of several blue elderberry (*Sambucus nigra* ssp. *caerulea*) trees with a non-native grassland understory. CDFW considers this alliance to be of high priority for inventory; however, its small size precludes any particular significance.

Wildlife

Wildlife values in areas surrounding the Project Site are moderately low. Urbanization surrounds the Project Site due to many decades of development in the Woodland Hills area. There are few native communities remaining within this area, and those which remain have little to no value to wildlife due to lack of connectivity. Although the coast live oak woodland on-site remains relatively intact, the isolated nature of the woodland and habitat conversion of the understory to mainly non-native grassland and ornamental species displaces native habitat and introduces exotic species. Wildlife usage of the site is probably largely restricted to common and/or urbanized mammals, reptiles, and avian species.

Though the Project Site is disturbed and is considered to have a moderately low value to wildlife, a number of common and urban-tolerant species probably utilize the Project Site for foraging. Wildlife species observed and expected to occur on-site are presented in the *General Biological Assessment Report* included in Appendix G. Some species (those adapted to urbanized areas) with high mobility, such as coyote (*Canis latrans*), red-tailed hawk (*Buteo jamaicensis*), great horned owl (*Bubo virginianus*), and urban-tolerant songbirds utilize the project area on a transitory and sometimes regular basis, depending on environmental factors present within their primary habitat and their degree of fear of humans and human activities. Urban-tolerant birds observed on-site included, but were not limited to, black phoebe (*Sayornis nigricans*), house sparrow, mourning dove (*Zenaidura macroura*), and house finch (*Carpodacus mexicanus*).

Habitat values within the Project Site are substantially diminished because the areas adjacent to the site have become developed. The site is surrounded by existing development, heavily-traveled roadways, and highly disturbed areas. Because the site is isolated from any larger blocks of similar habitat, the limited extent of native vegetation communities on-site, and the corresponding low potential for movement through the disjunct parcels of open space or parkland in the vicinity, the site is not considered to be an important wildlife corridor.

Sensitive Species

Potential occurrence of special status species on the Project Site was evaluated by first determining which special status species have potential to occur in the vicinity of the Project Site through a literature and database search. The following sources were reviewed to determine which special status plant and wildlife species have been documented to occur in the vicinity of the Project Site:

- a) CNDDDB for the Canoga Park USGS quadrangle¹⁰;
- b) A Natural History of California¹¹;
- c) The Mammals of North America¹²;
- d) Birds of Southern California, Status and Distribution¹³;
- e) California Birds: Their Status and Distribution¹⁴;

¹⁰ California Department of Fish and Game. 2006. *Natural Diversity Database, Wildlife and Habitat Data Analysis Branch*. Sacramento.

¹¹ Schoenherr, A.A. 1992. *A Natural History of California*, University of California Press, Berkeley, CA, 772 pp.

¹² Hall, E.R. 1981. *The Mammals of North America*. John Wiley and Sons, N.Y., N.Y. (2 volumes), 1181 pages.

¹³ Garrett, K. and J. Dunn. 1981. *Birds of Southern California, Status and Distribution*. Los Angeles Audubon Society, publication, 408 pages.

¹⁴ Small, A. 1994. *California Birds: Their Status and Distribution*. Ibis Publ., 342 pages.

- f) Mammalian Species of Special Concern in California¹⁵;
- g) Life on the Edge: A Guide to California's Endangered Natural Resources¹⁶.

Species Assessment

As mentioned previously, reconnaissance surveys were conducted on the Project Site by TeraCor on January 21 and February 12, 2006. Additionally, an updated field survey was conducted on May 19, 2015, and a follow-up mapping exercise was performed on July 10, 2015. During the surveys, the Project Site's biological resources were assessed for both general biological resources and for specific support resources for several rare species with potential to occur on-site in the area. Plant and animal species observed were recorded, and an assessment of the vegetation and site conditions was made to predict the presence of special status species on-site. The evaluation for presence of sensitive organisms (e.g., considered rare or otherwise sensitive by the USFWS, CDFG or the California Native Plant Society) included such variables as availability of support resources (such as rock outcrops, flowing water, specific host plants, nesting sites, etc.), the size of the Project Site, and the history of disturbance. The likelihood of potential occurrences is further predicated on the known distributions of species, and their overall habitat requirements.

An "occurrence probability rating" has been designated for each species based on the above described factors. Species occurrence has been: 1) **Confirmed Present**, 2) determined **Not Present**, or 3) determined to be one of the following:

- (1) **Low**. The subject Project Site is within the known range or distribution of the species. Suitable habitat on-site is marginal to non-existent. Site factors, such as disturbance or other human factors, likely preclude species occurrence. Focused investigation for the species is not warranted.
- (2) **Moderately Low**. The survey site is within the historic range of the species. Site factors may be somewhat suitable but other conditions may exist (adjacent urbanization, isolation, etc.) to suggest a fairly low probability of occurrence. The species has not recently been detected within the vicinity, or site conditions are such that sustained presence is unlikely.
- (3) **Moderate**. The species has a reasonable possibility of occurrence on-site. Habitats are generally suitable and the species is known to occur in the area.

¹⁵ Williams, D.F. 1986. *Mammalian Species of Special Concern in California*. California Department of Fish and Game, Wildlife Management Division Administrative Report, 86-1, 112 pages.

¹⁶ Thelander, C.G., ed. 1994. *Life on the Edge: A Guide to California's Endangered Natural Resources*, Biosystems Books, 550 pages.

(4) **Moderately High.** Habitats on the site are structurally suitable for the species and occurrence is recently confirmed in the vicinity of the site.

(5) **High.** The site contains highly suitable habitat for the species and disturbances, if present, would likely affect occurrence. The organism has recently been detected either on-site or in the vicinity, or ecological conditions are such that qualified personnel can reasonably anticipate presence.

Table 1 of the TeraCor *General Biological Assessment Report* (see Appendix G) presents the special status plant and wildlife species with potential to occur on the Project Site and their potential occurrence rating. Plant and animal species observed during the site surveys were recorded and are also included in Appendix G.

Based upon a review of the resources and databases available, as outlined in the discussion above, 48 special status plant species have been documented, or have the potential to occur, in the general vicinity of the Project Site. One plant, Southern California black walnut (*Juglans californica*) was observed on-site during the Project Site surveys. No other plants were determined to have a moderate or high potential for occurrence within the Project Site. Thirteen species are determined to have a low or moderately low potential to occur on-site, generally because of a species limited distribution and/or very limited or degraded on-site habitat. Thirty-four of these species are determined to be not present in the Project Site because the site lacks all specific habitat requirements such as suitable elevation, soils, and plant community type.

Southern California black walnut is a CNPS List 4.2 plant, meaning that it is a species of limited distribution (“watch list”) and is considered fairly endangered in California¹⁷, and has been assigned sensitivity rankings of G3 and S3.2 by CDFG, meaning that it is considered to be threatened and rare/restricted in its global and statewide range (refer to Table V.D-2 for rank definitions). This species occurs in chaparral, cismontane woodland and coastal scrub habitats on alluvial soils in canyons or on slopes between 50 and 900 meters in elevation¹⁸. Walnut forest is a much fragmented, rare, and declining vegetation community threatened by urbanization and grazing, and possibly by lack of natural reproduction¹⁹. Several Southern California black walnut trees were observed on the Project Site during the Project Site visits.

¹⁷ California Native Plant Society (CNPS). 2006. *Inventory of Rare and Endangered Plants* (online edition, v7-06b). California Native Plant Society. Sacramento, CA. <http://www.cnps.org/inventory>

¹⁸ California Department of Fish and Game. 2006. *Natural Diversity Database, Wildlife and Habitat Data Analysis Branch*. Sacramento.

¹⁹ California Native Plant Society (CNPS). 2006. *Inventory of Rare and Endangered Plants* (online edition, v7-06b). California Native Plant Society. Sacramento, CA. <http://www.cnps.org/inventory>

Wildlife

Additionally, several special status species of wildlife have been recorded, or have the potential to occur, in the vicinity of the Project Site. Table 1 in the *General Biological Assessment Report* (see Appendix G) summarizes the potential for occurrence for these species. Twenty-seven species were considered to be not present due to a lack of habitat, or to have a low to moderately low potential to occur on-site due to a species' limited distribution, very limited or degraded on-site habitat, or due to the isolation of habitat due to surrounding development. Several species are considered to have a moderate or moderately high potential to occur on-site, while four species were observed on-site during surveys, which were the Nuttall's woodpecker, coastal whiptail, oak titmouse, and Cooper's hawk.

Sensitive Natural Communities

Coast Live Oak Woodland. Although the coast live oak woodland plant community is listed in the CNDDDB, it is only assigned a sensitivity ranking of G4 S4, which means that this plant community is apparently secure, although factors exist to cause some concern (see Table V.D-2). Although CEQA statute §21083.4 requires consideration of impacts and mitigation for oak woodlands, this only applies when Counties retain jurisdiction over a parcel; for the Proposed Project, the City of Los Angeles retains jurisdiction and, therefore, this CEQA statute does not apply. Coast live oak woodland and forest plant communities are well distributed throughout southern California and the Santa Monica Mountains, which is in the project vicinity to the south. In addition, the project would retain much of the existing oak woodland/forest habitat on-site, the majority of which is located along the southern and eastern boundaries and in the northeastern corner of the Project Site.

Willow Scrub. Willow scrub is often considered a sensitive plant community as it is usually associated with creeks and riparian habitat. Many riparian plant communities dominated by willows are listed as sensitive in the CNDDDB; however, the willow scrub on-site is not located within riparian habitat or along a watercourse of any kind and, therefore, would not meet the definitions of any of the sensitive riparian plant communities. Willow-dominated plant communities are also often considered sensitive as they are regulated under the jurisdiction of CDFG (Section 1600 of the Fish and Game Code) when located on stream banks or lake shores as riparian habitat; however, the willows on-site are not associated with stream banks or lake shores. In addition, the willow scrub patches on-site are small, isolated, and are comprised of relatively few trees.

Jurisdictional Resources

A USGS-designated blue line stream is depicted on-site on the 1967 Canoga Park 7.5-minute USGS quadrangle. The blue line stream has since been modified on-site and off-site such that northerly flows are now intercepted under Mulholland Drive and conveyed into a subdrain and no longer flow onto the Project Site. The only water which now enters the site originates as surface runoff from Mulholland Drive which flows down the steep slope from the road onto the site; this ephemeral sheet flow has created erosional gullies on the steep slope along Mulholland Drive, and installation of a curb along the north side

of the road would likely eliminate this condition. This runoff appears to either disperse onto the surface of the site or enter into the groundwater table once it reaches level ground, as there are no indicators of ponding, dominance of hydrophytic vegetation, or a surface flow pattern on-site; therefore, these gullies are considered to be isolated and, therefore, non-jurisdictional. A former pond is also present on-site but it no longer holds water or exhibits evidence of ponding water. Downstream of the former pond, a former watercourse was only partially visible and did not exhibit evidence of recent flow. No features on-site, including the former pond, watercourse and erosion gullies, appeared to exhibit characteristics (i.e. dominance of hydrophytic vegetation, flow pattern or ordinary high water mark) to indicate that they would be considered jurisdictional wetlands or waters by resource agencies.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G of the *CEQA Guidelines*, the Proposed Project could have a significant environmental impact on biological resources if it would:

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

Project Details

As mentioned earlier, the Proposed Project includes the subdivision of the Project Site into two lots and the development of 19 residential lots. The 19 proposed homes will be comprised of three plan types.

Project implementation will additionally involve the construction of vehicle access ways and driveways for the proposed units, and associated infrastructure.

Project Impacts

Sensitive Species

Removal of natural habitat within the Project Site would contribute incrementally to the loss of natural habitats in the City of Los Angeles. Continuing urbanization displaces and destroys wildlife and permanently removes native plant communities. In particular, the quality of habitats within the Project Site has been diminished by former uses on the Project Site, and surrounding urbanization has largely isolated the property from nearby habitats in the Santa Monica Mountains. Based on these conditions, potential impacts to special status species are less than significant and no mitigation is required.

Implementation of the Proposed Project would result in the removal of 15 coast live oak trees as defined by the City of Los Angeles at the time the Tree Report was updated and the site was reevaluated in January 2015. An additional 13 trees, all non-native with the exception of three Mexican elderberry trees, would also be removed to accommodate the Project, for a total of 28 trees removed of the 199 trees on the Project Site. The removal of any oak or Southern California black walnut tree as defined by the City requires a tree removal permit from the City of Los Angeles, along with appropriate mitigation. No black walnut trees are proposed for removal. The removal of 15 coast live oaks prior to mitigation would constitute a significant impact. However, with Mitigation Measure D-1 below, which would require oak tree replacement at a 2:1 ratio, potential impacts would be reduced to a less than significant level. Additionally, Mitigation Measure D-2, which requires the use of native trees and shrubs, is also recommended to help reduce potential impacts to a less than significant level.

Overall, the Proposed Project may have a substantial adverse effect, either directly or through habitat modifications. These potential impacts can be reduced to less than significant levels with the implementation of Mitigation Measure D-3. This measure would include avoidance and protection of nests during construction, hand removal of nests outside of the nesting season for nests that cannot be avoided, and project timing to avoid breeding disturbance. Thus, the Proposed Project would have a less than significant impact with respect to foraging habitat.

Lastly, construction personnel have the potential to be destructive to plant and animal life. Small mammals and reptiles are particularly subject to disturbance from harassment, capture, or accidental death. Although this temporary direct effect is not considered significant, and can be minimized via Mitigation Measure D-5, which would provide written and verbal instructions to all personnel on-site and contractually obligate these personnel to respect the natural environment, Mitigation Measure D-4 will help to ensure that construction impacts are minimized by fencing wildlife out of active construction areas.

Sensitive Natural Communities

A substantial portion of the on-site vegetation communities could be impacted due to removal or degradation during Project construction due to grading on-site and along San Feliciano Drive and from home and road installation. Remaining habitat following Project construction may be indirectly impacted due to invasion from installed landscape plants or increases in irrigation or fertilizer usage from new residential lawn or landscaping maintenance. Therefore, an impact to native trees and shrubs is potentially significant and mitigation is required. Mitigation Measure D-2 requires the preparation of a landscape plan using native and non-invasive trees and shrubs. With implementation of Mitigation Measure D-2, potential impacts to sensitive natural communities would be reduced to a less than significant level.

Jurisdictional Resources

No wetland or water features that are considered jurisdictional are present on-site; therefore, the Project would not result in significant impacts to jurisdictional resources. Relict features such as the former pond and former blue line stream no longer exhibit evidence of ponding (i.e., ordinary high water mark, algal mats or sediment deposits), flow (i.e., ordinary high water mark, scouring, debris pattern or “wrack” line), or aquatic life (i.e., aquatic invertebrates or vertebrates, riparian or hydrophytic vegetation) that would bring them under the regulatory jurisdiction of the Corps, CDFG or RWQCB. Although several erosional gullies have developed along the steep slope at the southwestern corner of the Project Site due to runoff from Mulholland Drive, these features appear to be highly ephemeral (i.e., only flowing after storm events) and do not appear to connect to any jurisdictional features off-site, thus making these features non-jurisdictional. Thus, potential impacts to jurisdictional resources would be less than significant.

Wildlife Movement and Habitat Connectivity

Wildlife movement corridors, also called dispersal corridors, habitat or landscape linkages, and connectivity zones, are linear features whose primary wildlife function is to connect at least two significant habitat areas or larger core areas^{20,21}. Wildlife corridors generally focus on mammals and reptiles, as birds can fly over developed areas between habitat patches and amphibians and aquatic wildlife rely on waterways for dispersal between habitat patches. These areas are generally bordered by human development and often consist of canyon bottoms, watercourses, and other remnant habitats that have remained undeveloped. Corridors help to prevent habitat fragmentation which may result in the loss of corridors also enhance wildlife reproductive success by promoting the exchange of genetic material between subpopulations of a species, allowing for evolutionary adaptations.

²⁰ 2000. Missing Linkages: Restoring Connectivity to the California Landscape.
<http://www.calwild.org/resources/pubs/linkages/index.htm>

²¹ Beier, P. and S. Loe. 1992. A checklist for evaluating impacts to wildlife movement corridors. *Wildlife Society Bulletin* 20:434-440. Cited in: *Principles of Wildlife Corridor Design*, Monica Bond, Center for Biological Diversity, October 2003, <http://www.biologicaldiversity.org/swcbd/Programs/sprawl/wild-corridors.pdf>

Although mammals and reptiles may currently cross over Mulholland Drive between the Project Site and the relatively natural habitat areas on the school and park property to the south of Mulholland Drive, the Project Site does not function as part of a true wildlife corridor since wildlife dispersal across the Project Site is currently compromised by vehicle traffic on Mulholland Drive. In addition, the Project Site does not act to connect two significant or large core habitat areas; rather, the Project Site is a relatively small habitat island surrounded almost completely by suburban development.

Given that much of the Project Site is nearly surrounded by suburban development and a busy street (Mulholland Drive), the Project Site provides no linkage wildlife movement or nursery use. In addition, no major migratory routes for mule deer or other important migratory animals have been identified on or adjacent to the Project Site. Therefore, no significant impacts to wildlife movement, migration corridors, or nursery sites will occur from implementation of the Proposed Project.

Conformance with Local Policies and Ordinances

The Proposed Project would preserve 171 trees and require the removal of 28 existing trees on the Project Site. Section 46.00 et seq. of the Los Angeles Municipal Code (LAMC), and Los Angeles City Ordinance No. 177,404 set forth regulations for the preservation of certain protected species trees in the City and further provide that a protected species tree cannot be removed or relocated without first obtaining a permit from the Board of Public Works. In addition, the Project Site is within the Mulholland Scenic Parkway Specific Plan (MSPSP) and is thus subject to the regulations and requirements of the MSPSP. The MSPSP calls for the preservation of as many mature trees on a Project Site as possible and requires that trees that are removed be replaced, as conditioned in Mitigation Measure D-1. Further, as required by Los Angeles City Ordinance No. 170,978, a comprehensive landscaping program would be implemented for the Proposed Project under Mitigation Measure D-2. Therefore, while impacts to protected species trees, native trees, and other mature non-native trees on the Project Site from Project construction may be considered potentially significant prior to mitigation; these impacts would be reduced to a less than significant level through the implementation of Mitigation Measures D-1 and D-2 and in accordance with regulatory requirements under the MSPSP and the LAMC.

Conformance with Adopted Habitat Conservation Plans, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

No Habitat Conservation Plans, Natural Community Conservation Plans or other such local or regional plans have been adopted that encompass the Project Site; therefore, no impacts are anticipated and no mitigation is considered necessary.

CUMULATIVE IMPACTS

The only cumulative development project that is currently proposed within the vicinity of the Project Site, the Clarendon Street Apartments project, is located approximately 1.3 miles from the Project Site and is adjacent to the US 101 (Ventura) Freeway. Because this project is located in an existing developed area

at a considerable distance from the Project Site, it would not combine with the Proposed Project to result in a significant cumulative impact with respect to biological resources. Since no other cumulative development projects are proposed within the Project area, impacts are not anticipated to be cumulatively considerable or significantly adverse.

MITIGATION MEASURES

The following mitigation measures are required to reduce potential impacts to special-status species to less than significant levels. Subsequent permitting processes with resource agencies could result in additional mitigation beyond that required by the City of Los Angeles in the CEQA process. Any additional mitigation required by these agencies would be incorporated as a condition of their permit authorization.

- D-1** The 15 removed coast live oak trees shall be replaced with a minimum 36-inch box-size specimen coast live oaks at a minimum 2:1 ratio.
- D-2** Native trees and shrubs shall be utilized on-site in the landscape plan. Commercially available ornamental trees may be utilized on-site as long as 1) the species is not prohibited for installation by the City of Los Angeles Public Works Department along right-of-ways, and 2) the species has not been identified by the California Invasive Plant Council as an invasive risk in southern California.
- D-3** Habitat alteration or removal shall be performed outside of the bird nesting season which extends approximately from March 15 through July 31. Should habitat need to be removed during bird nesting season, a detailed nesting survey must be performed by a qualified biologist to determine if active nests are present prior to removal of support resources.
- D-4** Construction fencing (orange safety fencing) shall be placed around the perimeter of the work site during periods of active construction work, including site grading. Periodic monitoring to insure that fence boundaries are maintained shall be conducted.
- D-5** Written and verbal instructions will be provided to all construction personnel on-site contractually obligating these personnel to respect the natural environment and to avoid, to the extent feasible, causing intentional harm to wildlife on-site during construction activity.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Biological resource impacts would be reduced to less than significant levels after implementation of the above mitigation measures and through compliance with applicable regulations.

V. ENVIRONMENTAL IMPACT ANALYSIS

E. GREENHOUSE GAS EMISSIONS

The global nature of climate change creates unique challenges for assessing the Project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of greenhouse gas emissions (GHGs) across the globe, a single project's impact will be negligible. To further complicate this, there is debate about whether a project's emissions are adding to the net emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world.

Climate change analyses are also unique because emitting CO₂ into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO₂ in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a project's incremental contribution of CO₂ into the atmosphere, it is typically not possible to determine whether or how an individual project's relatively small incremental contribution might translate into physical effects on the environment. Nevertheless, both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Proposed Project are discussed in this section. Analytical modeling results supporting the discussion in this section are included in Appendix F to this Draft EIR.

ENVIRONMENTAL SETTING

Pollutants and Effects

Various gases in the Earth's atmosphere, classified as atmospheric GHGs, play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHGs are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

GHGs that contribute to the greenhouse effect include:

- Carbon Dioxide (CO₂) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO₂ emissions from motor vehicles

occur during operation of vehicles and operation of air conditioning systems. CO₂ comprises over 80 percent of GHG emissions in California.¹

- Methane (CH₄) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.²
- Nitrous Oxide (N₂O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N₂O emissions.³ N₂O emissions from motor vehicles generally occur directly from operation of vehicles.
- Hydrofluorocarbons (HFCs) are one of several high global warming potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.
- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.
- Sulfur Hexafluoride (SF₆) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF₆ are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.⁴ As illustrated in Table V.E-1, the other GHGs are less abundant but have higher GWP than CO₂. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. Expressing

¹ California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006, p. 11.

² United States Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003*, April 2005 (EPA 430-R-05-003).

³ United States Environmental Protection Agency, *U.S. Adipic Acid and Nitric Acid N₂O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions*, December 2001

⁴ California Air Resources Board, *Climate Change Emission Control Regulations*, 2004

GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted. High GWP gases such as HFCs, PFCs, and SF₆ are the most heat-absorbent.

Table V.E-1
Global Warming Potential for Greenhouse Gases

Greenhouse Gas	Global Warming Potential (100-Year)
Carbon Dioxide (CO ₂)	1
Methane (CH ₄)	28
Nitrous Oxide (N ₂ O)	265
Perfluorocarbons (PFCs)	7,000-11,000
Hydrofluorocarbons (HFCs)	100-12,000
Sulfur Hexafluoride (SF ₆)	23,500
<i>Source: California Air Resources Board, First Update to the Climate Change Scoping Plan. May 2014.</i>	

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the state has developed a strategy to adapt the state's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation

Strategy (Strategy) analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins with what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change. The Strategy's key preliminary adaptation recommendations include:

- Appointment of a Climate Adaption Advisory Panel;
- Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020 from 2011 levels;
- Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;
- Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;
- Consideration of climate change impacts for all significant state projects;
- Assessment of climate change impacts on emergency preparedness;
- Identification of key habitats and development of plans to minimize adverse effects from climate change;
- Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;
- Amendment of General Plans and Local Coastal Plans to address climate change impacts and to develop local risk reduction strategies; and
- Inclusion of climate change impact information into fire program planning by state fire fighting agencies.

Regulatory Setting

International

Kyoto Protocol

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States (the “U.S.”) joined other countries around the world in signing the United Nations’ Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt.

The Kyoto Protocol (the “Protocol”) is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol’s commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of “common but differentiated responsibilities.”

Negotiations after the Protocol have continued in an attempt to address the period after the first “commitment period” of the Protocol, which is set to conclude at the end of 2012. In Durban, South Africa, parties to the protocol agreed in principle to negotiate a new comprehensive and legally binding climate agreement by 2015 to enter into force for all parties from 2020. However, significant divisions remain in determining the parameters of any such new protocol, including its enforcement mechanisms and the degree to which developing economies will begin to be subject to binding emissions targets.

The Western Regional Climate Action Initiative (WCI)

The Western Regional Climate Action Initiative (WCI) is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region’s electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated

that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The California Air Resources Board's (CARB) planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

Federal

The U.S. Environmental Protection Agency (U.S. EPA) has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S. Supreme Court found that GHG emissions could be considered within the Clean Air Act's definition of a pollutant.⁵ In December 2009, the U.S. EPA issued an endangerment finding for GHG emissions under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and the U.S. EPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon.

In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding \$8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, invests in renewable energy sources, calling for adaptation programs, and leading international efforts to address climate change. In September 2013, the U.S. EPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants. The rules containing these standards went into effect in October 2015.

Vehicle Standards

Other regulations have been adopted to address vehicle standards including the U.S. EPA and National Highway Traffic Safety Administration (NHTSA) joint rulemaking for vehicle standards.

- On March 30, 2009, the NHTSA issued a final rule for model year 2011.⁶

⁵ *Massachusetts v. Environmental Protection Agency et al* (127 S. Ct. 1438 [2007])

⁶ *NHSTA. 2009. Average Fuel Economy Standards Passenger Cars and Light Trucks Model Year 2011, Final Rule. 75 Fed. Reg. 25324.*

- On May 7, 2010, the U.S. EPA and the NHTSA issued a final rule regulating fuel efficiency and GHG emissions pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016.⁷
- On August 9, 2011, U.S. EPA and NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal GHG emissions and fuel economy standards for model year 2017-2025 light-duty vehicles.⁸
- NHSTA intends to set standards for model years 2022-2025 in a future rulemaking.⁹
- In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the U.S. EPA and the NHTSA announced fuel economy and GHG emissions standards for medium- and heavy-duty trucks that applies to vehicles from model year 2014–2018.¹⁰

Energy Independence and Security Act (the “EISA”)

Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

- 1) Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- 2) Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
- 3) While superseded by NHTSA and U.S. EPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy

⁷ U.S. EPA. 2010. *Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule*. 75 Fed. Reg. 25324.

⁸ Available <http://www.gpo.gov/fdsys/pkg/FR-2011-08-09/pdf/2011-19905.pdf>. Accessed November 2011.

⁹ NHSTA. 2012. *2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards*. 77 Fed. Reg. 62624.

¹⁰ U.S. EPA Office of Transportation and Air Quality. 2011. *EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-Duty Vehicles*. Available: <http://www.epa.gov/otaq/climate/documents/420f11031.pdf>. Accessed November 2011.

program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”

State

Assembly Bill 1493

California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 was enacted in September 2003 and requires regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by vehicles used for personal transportation.

Executive Order S-3-05

On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency (Cal EPA) formed a Climate Action Team (“CAT”) that recommended strategies that can be implemented by state agencies to meet GHG emissions targets.

Assembly Bill 32

In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It 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.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, CARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.¹¹ On October 25, 2007, CARB approved measures improving truck efficiency (i.e., reducing

¹¹ California Air Resources Board, *Proposed Early Action Measures to Mitigate Climate Change in California*, April 20, 2007.

aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emissions from the non-electricity sector. CARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO₂ per year and make up 94 percent of the point source CO₂ emissions in California.

CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by CARB in coordination with the CAT, was first published in October 2008 (the “2008 Scoping Plan”). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state’s dependence on oil, diversify the state’s energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the state’s emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California’s clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. As required by AB 32, CARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

In order to assess the scope of reductions needed to return to 1990 emissions levels, CARB first estimated the 2020 “business-as-usual” (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the Scoping Plan, CARB updated the Scoping Plan through a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).¹² CARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building

¹² California Air Resources Board, *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED)*, Attachment D, August 19, 2011.

energy efficiency standards, and renewable energy.¹³ Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent).

On May 22, 2014, CARB approved its first update to the AB 32 Scoping Plan, recalculating 1990 GHG emissions to be 431 MMTCO₂e using the IPCC Fourth Assessment Report (AR4) released in 2007. Therefore, the 2020 GHG emissions limit would be slightly higher than the 427 MMTCO₂e identified in the Scoping Plan. Based on the revised estimates of expected 2020 emissions of 509 MMTCO₂e, achieving the 1990 emission level would require a reduction in BAU GHG emissions of 78 MMTCO₂e (a reduction of approximately 15.3 percent).

Senate Bill 1368

Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

SB 97 & CEQA Guidelines

In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor's Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the CARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the CARB's recommended CEQA thresholds;

¹³ California Air Resources Board, *Greenhouse Gas Inventory – 2020 Emissions Forecast*, <http://www.arb.ca.gov/cc/inventory/data/forecast.htm>. Accessed August 2015.

- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

Senate Bill 375

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations ("MPOs") to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.¹⁴

On October 24, 2008, CARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). CARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO₂e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, CARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as

¹⁴ American Planning Association, California Chapter, *Analysis of SB 375*, <http://www.calapa.org/-en/cms/?2841>, accessed March 30, 2009.

manufacturing plants, or uses that utilize combustion engines.¹⁵ There is currently no timetable for finalized thresholds.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.¹⁶ For the area under the Southern California Association of Governments' (SCAG) jurisdiction, including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the CARB's Executive Officer approved the final targets.¹⁷

The SCS for the southern California region, including Riverside, Los Angeles, Orange, and San Bernardino counties was prepared by SCAG and approved on April 4, 2012. SCAG's SCS is included in the SCAG 2012-2035 Regional Transportation Plan Sustainable Communities Strategy (the "RTP/SCS").

The RTP/SCS plans to concentrate future development and provide higher intensity development, including residential development, in proximity to transit hubs in order to reduce vehicle miles traveled (VMT) and thereby reduce GHG emissions from personal vehicles. To conduct required modeling analysis for the 2012-2035 RTP/SCS, SCAG distributes the growth forecast to transportation analysis zones (TAZs) to capture localized effects of the interaction of land use and transportation. The TAZ level maps have been developed for the purpose of modeling performance only.¹⁸ The growth and land use assumptions are to be adopted at the jurisdictional level.¹⁹ Further, it is important to note that there is nothing in SB 375 that requires a city's "land use policies and regulations...to be consistent with the regional transportation plan or an alternative planning strategy."²⁰

¹⁵ California Air Resources Board: <http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf>

¹⁶ California Air Resources Board. Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375. <http://www.arb.ca.gov/cc/sb375/notice%20of%20decision.pdf>

¹⁷ CARB. 2011. Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.

¹⁸ Southern California Association of Governments, 2012-2035 Regional Transportation Plan Sustainable Communities Strategy, p. 124.

¹⁹ Ibid.

²⁰ California Gov't. Code §65080(b)(2)(E).

The RTP/SCS also includes an appendix listing examples of measures that could reduce impacts from planning, development and transportation.²¹ It notes, however, that the example measures are "not intended to serve as any kind of checklist to be used on a project-specific basis." Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized. Example GHG emissions reduction measures include the following:

- **GHG1:** SCAG member cities and the county governments may adopt and implement Climate Actions Plans (CAPS, also known as Plans for the Reduction of Greenhouse Gas Emissions as described in CEQA Guidelines Section 15183.5 Tiering and Streamlining the Analysis of Greenhouse Gas Emissions).
- **GHG2:** Project sponsors may require Best Available Control Technology (BACT) during construction and operation of projects, including:
 - a) Solicit bids that include use of energy and fuel-efficient fleets;
 - b) Solicit preference construction bids that use BACT, particularly those seeking to deploy zero- and/or near zero emission technologies;
 - c) Employ use of alternative fueled vehicles;
 - d) Use lighting systems that are energy efficient, such as LED technology;
 - e) Use CEQA Guidelines Appendix F, Energy Conservation, to create an energy conservation plan;
 - f) Streamline permitting process to infill, redevelopment, and energy-efficient projects;
 - g) Use an adopted emissions calculator to estimate construction-related emissions;
 - h) Use the minimum feasible amount of GHG-emitting construction materials that is feasible;

²¹ Southern California Association of Governments, *Final PEIR, 2012-2035 RTP/SCS, Appendix G*: http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf.

- i) Use of cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
 - j) Use of lighter-colored pavement where feasible;
 - k) Recycle construction debris to maximum extent feasible; and
 - l) Plant shade trees in or near construction projects where feasible.
- **GHG3:** Local jurisdictions can and may establish a coordinated, creative public outreach activities, including publicizing the importance of reducing GHG emissions and steps community members may take to reduce their individual impacts.
 - **GHG4:** Pedestrian and Bicycle Promotion: Local jurisdictions may work with local community groups and business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation.
 - **GHG5:** Waste Reduction: Local jurisdictions can and may organize workshops on waste reduction activities for the home or business, such as backyard composting, or office paper recycling, and may schedule recycling drop-off events and neighborhood chipping/mulching days.
 - **GHG6:** Water Conservation: Local jurisdictions may organize support and/or sponsor workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, and installing advanced irrigation systems.
 - **GHG7:** Energy Efficiency: Local jurisdictions may organize workshops on steps to increase energy efficiency in the home or business, such as weatherizing the home or building envelope, installing smart lighting systems, and how to conduct a self-audit for energy use and efficiency.
 - **GHG8:** Schools Programs: Local jurisdictions may develop and implement a program to present information to school children about climate change and ways to reduce GHG emissions, and may support school-based programs for GHG reduction, such as school based trip reduction and the importance of recycling.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State's GHG targets with those set in

October 2014 by the European Union and is intended to help the State meet its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs CARB to update the Climate Change Scoping Plan.

Title 24 Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (the "CCR"), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The updated 2013 CALGreen Code became effective January 1, 2014 and includes new requirements for additions to existing residential and non-residential development.

Regional

South Coast Air Quality Management District Recommendations for Significance Thresholds

The South Coast Air Quality Management District (SCAQMD) convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board

adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of CO₂ equivalent (MTCO₂e) as a screening numerical threshold for stationary sources.

The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions which recommended a screening threshold of 3,500 MTCO₂e for residential projects, 1,400 MTCO₂e for commercial projects, and 3,000 MTCO₂e for mixed use projects, additionally the Working Group identified project-level efficiency target of 4.8 MTCO₂e per service population as a 2020 target and 3.0 MTCO₂e per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 MTCO₂e and the plan-level target for 2035 was 4.1 MTCO₂e. The SCAQMD has not established a timeline for formal consideration of these thresholds.²² In the meantime, the project level thresholds are used as a non-binding guide; GHG emissions would be considered potentially significant in the absence of mitigation measures.

The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the Project.

Local

City of Los Angeles

In May 2007, the City released its Green LA Plan that sets a goal to reduce the generation of GHG emissions 35 percent below 1990 levels by 2030. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos.

The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.²³ Larger projects must meet equivalent standards to those necessary to achieve the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification

²² SCAG, *Final PEIR for the 2012-2035 RTP/SCS, Appendix G*. Accessible at http://rtpscs.scag.ca.gov/Documents/peir/2012/PEIR_AppendixG_ExampleMeasures.pdf

²³ City of Los Angeles, *Ordinance No. 179820, added to LAMC as Section 16.10 (Green Building Program)*.

generally ensures that projects exceed Title 24 (2013) standards by at least 10 percent.²⁴ The City's ordinance affects the following types of development:²⁵

- New non-residential building or structure of 50,000 gross square feet or more of floor area;
- New mixed-use or residential building of 50,000 gross square feet or more in excess of six stores;
- New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;
- The alternation or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;
- The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.

The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new low-rise residential buildings, including:

Section 99.04.106.2. Storm Water Drainage and Retention During Construction. Projects that disturb less than one acre of soil and are not part of a larger common plan of development, which in total disturbs one acre or more, shall manage storm water drainage during construction. In order to manage stormwater drainage during construction, one or more of the following measures shall be implemented to prevent flooding of adjacent property, prevent erosion and retain soil runoff on the site:

1. Retention basins of sufficient size shall be utilized to retain stormwater on the site.
2. Where stormwater is conveyed to a public drainage system, collection point, gutter, or similar disposal method, water shall be filtered by use of a barrier system, wattle or other method approved by the Department, or

²⁴ U.S. Green Building Council. "Interpretation 10396" accessed at <http://www.usgbc.org/leed-interpretations?keys=10396> February 26, 2015.

²⁵ Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.

3. Compliance with the City of Los Angeles' stormwater management ordinance(s).

Section 99.04.204. Energy Reduction. Prescriptive Approach. Equipment and fixtures shall comply with the following where applicable:

1. Installed gas-fired space heating equipment shall have an Annual Fuel Utilization Ratio (AFUE) of .90 or higher.
2. Installed electric heat pumps shall have a Heating Seasonal Performance Factor (HSPF) of 8.0 or higher.
3. Installed cooling equipment shall have a Seasonal Energy Efficiency Ratio (SEER) higher than 13.0 and an Energy Efficiency Ratio (EER) of at least 11.5.
4. Installed tank type water heaters shall have an Energy Factor (EF) higher than .6.
5. Installed tankless water heaters shall have an Energy Factor (EF) higher than .80.
6. Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
7. Building lighting in the kitchen and bathrooms within the dwelling units shall consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).
8. Installed swimming pool circulating pump motors shall be multi-speed or variable-speed. The pump motor controls shall have the capability of operating the pump at a minimum of three speeds; low speed, medium speed, and high speed. The daily low speed shall not exceed 300 watts. The daily medium speed shall be adjustable.

Section 99.04.210. Appliances. Appliance Rating. Each appliance provided and installed shall meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

Section 99.04.211. Renewable Energy. Future Access for Electrical Solar System. An electrical conduit shall be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system. Exception: Buildings designed and constructed with a solar photovoltaic system or an alternate system with means of generating electricity at time of final inspection.

Section 99.04.211.4.1. Space for Future Electrical Solar System Installation. A minimum of 250 square feet of contiguous unobstructed roof area shall be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Section 99.04.303.1. Twenty Percent Savings. A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:

1. Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or
2. A calculation demonstrating a 20 percent reduction in the building “water use” baseline as established on Table 4.303.1 shall be provided. For low-rise residential occupancies, the calculation shall be limited to the following plumbing fixture and fitting types: water closets, urinals, lavatory faucets, kitchen faucets and showerheads.

Section 99.04.303.2. Multiple Showerheads Serving One Shower. When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads shall not exceed the maximum flow rates specified in the 20 percent reduction column contained on Table 4.303.2 or the shower shall be designed to only allow one showerhead to be in operation at a time. Exception: The maximum flow rate for showerheads when using the calculation method specified in Section 99.04.303.1, Item 2, is 2.5 gpm @ 80 psi.

Section 99.04.304.1. Irrigation Controllers. When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input. Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers that meet the criteria in Section 99.04.304.1.

Section 99.04.406. Enhanced Durability and Reduced Maintenance. Joints and Openings. Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate

gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.

Section 99.05.407.3. Water Resistance and Moisture Management. Flashing Details. Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Section 99.04.407.4. Material Protection. Protect building materials delivered to the construction site from rain and other sources of moisture.

Section 99.4.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent. Pursuant to Section 66.32 et seq. of the LAMC.

Section 99.04.504.1. Covering of Duct Openings and Protection of Mechanical Equipment During Construction. At the time of rough installation or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheetmetal or other methods acceptable to the Department to reduce the amount of dust or debris which may collect in the system.

Section 99.04.505.2. Interior Moisture Control. Concrete Slab Foundations. Concrete slab foundations required to have a vapor retarder by Los Angeles Building Code, Chapter 19, shall also comply with this section.

Section 99.04.505.2.1. Interior Moisture Control. Capillary Break. A capillary break shall be installed in compliance with at least one of the following:

1. A 4-inch (101.6 mm) thick base of ½ inch (12.7 mm) or larger clean aggregate shall be provided with a vapor barrier in direct contact with concrete and a concrete mix design, which will address bleeding, shrinkage, and curling, shall be used.
2. Other equivalent methods approved by the Department, or
3. A slab design specified by a licensed design professional.

Section 99.04.505.3. Interior Moisture Control. Moisture Content of Building Materials. Building materials with visible signs of water damage shall not be installed. Wall and floor framing shall not be enclosed until it is inspected and found to be satisfactory by the building inspector. Insulation materials that are visibly wet or have high moisture content shall be replaced or allowed to dry prior to enclosure in wall or floor cavities. Wet-applied insulation materials shall follow the manufacturers' drying recommendations prior to enclosure.

Existing Emissions

The Project Site includes abandoned structures, trees, shrubs, low-lying weeds and grass, and vegetation that produce no meaningful anthropogenic emissions. As a result, it is assumed that the Project Site does not currently emit GHG emissions. It should be noted that biogenic emissions of GHG could come from any decomposition of biological material.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant greenhouse gas emissions impact may occur if the proposed project would result in any of the following conditions:

- (a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, or
- (b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Methodology

To address the first criterion, this analysis uses the 2014 Revised AB 32 Scoping Plan's statewide goals as the basis for the GHG significance threshold (i.e., 15.3 percent reduction from BAU). The methodology utilized in this analysis is to compare the Proposed Project's emissions as proposed to the Proposed Project's emissions if the Proposed Project were built using a BAU (or No Action Taken, NAT) approach in terms of design, methodology, and technology. This means that the Proposed Project's emissions were calculated as if the Proposed Project was constructed before AB 32 and then were compared to the emissions that would be generated by the Proposed Project as constructed with project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32.

Construction Emissions

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project Site. These impacts would vary day to day over the 26-month duration of construction activities. As illustrated in Table V.E-2, construction emissions of CO₂e would peak in 2015, when up to 15,489 pounds of CO₂e per day are anticipated following implementation of Mitigation Measures C-1 through C-5.

Table V.E-2
Estimated Construction GHG Emissions (Mitigated)^a

Construction Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
2015	15,397	4	0	15,489
2016	15,230	4	0	15,322
2017	5,829	1	0	5,858
^a All quantities in pounds per day. Source: DKA Planning 2015, based on CalEEMod 2013.2.2				

Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Proposed Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Proposed Project emission reductions are results of Proposed Project's commitments and regulatory changes, which include the implementation of the RPS of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

Operational Emissions

Greenhouse gas emissions were calculated for long-term operations. As shown in Table V.E-3, the emissions for the Proposed Project and its associated BAU scenario are estimated to be 413 and 607 MTCO₂e per year, respectively, which shows the Proposed Project will reduce emissions by 32 percent from the BAU scenario. Based on these results, the Proposed Project meets the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan. As a result, the Proposed Project's contribution to global climate change is not cumulatively considerable and is considered less than significant.

Table V.E-3
Estimated Operations CO₂e Greenhouse Gas Emissions (Mitigated)^a

Scenario and Source	Business As Usual Scenario*	As Proposed Scenario	Reduction from Business As Usual Scenario	Change from Business as Usual Scenario
Area Sources	5	5	-	0%

Energy Sources	194	112	-81	-42%
Mobile Sources	377	265	-112	-30%
Waste Sources	10	10	-	0%
Water Sources	15	15	-	0%
Construction	6	6	-	0%
Total Emissions	607	413	-194	-32%

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period. To ensure a conservative estimate, emissions from existing development were not included in the calculation of net emissions increases.

** BAU scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

^a All quantities in metric tons per year.

Source: DKA Planning, 2015.

The Proposed Project will comply with the City of Los Angeles' Green Building Ordinance standards. Projects in compliance with this ordinance generally exceed Title 24 (2013) standards by at least 10 percent.²⁶ Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development, including:

1. **GHG Emissions Associated with Planning and Design.** The Project must include required measures for single-family residential developments to reduce stormwater pollution, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. Factors favoring the Project's consistency with these goals would include:
 - Access to public transportation. LA Metro operates Route 169 in the vicinity of the Project Site.

²⁶ U.S. Green Building Council. "Interpretation 10396" accessed at <http://www.usgbc.org/leed-interpretations?keys=10396>, February 26, 2015.

- Located near residential neighborhoods. The Project Site's proximity to low- and medium-density residential neighborhoods increases the likelihood that more travel to and from the development will be made by non-motorized modes that will reduce potential GHG emissions.
2. **GHG Emissions Associated with Energy Demand.** The Project must meet Title 24 2013 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This includes:
- Use of low-emitting paints, adhesives, carpets, coating, and other materials.
 - Equipment and fixtures will comply with the following where applicable:
 - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.
 - Installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.
 - Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
 - Installed tank type water heaters will have an Energy Factor higher than .6.
 - Installed tankless water heaters will have an Energy Factor higher than .80.
 - Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
 - Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).
 - An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system.

- A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.
 - Appliances will meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.
3. **GHG Emissions Associated with Water Use.** The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use. This would include:
- A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:
 - Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or
 - A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.
 - When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads will not exceed specified flow rates.
 - When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:
 - Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
 - Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).

4. **GHG Emissions Associated with Solid Waste Generation.** The Project is subject to construction waste reduction of at least 50 percent. In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.
5. **GHG Emissions Associated with Environmental Quality.** The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:
 - Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.
 - Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

In addition to the GHG emission reductions described above, it is important to note that the CO₂ estimates from mobile sources (particularly CO₂, CH₄, and N₂O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (e.g., commuting, shopping) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

Consistency with Applicable Plans

The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted earlier, the Proposed Project would be consistent with a number of relevant plans and policies that govern climate change. In particular, the Proposed Project is consistent with the State's Executive Order S-3-05, which calls for reducing GHG emissions statewide to 1990 levels, including 15.3 percent reductions by 2020. In addition, the Proposed Project is consistent with SCAG's 2012-2035 RTP/SCS, which calls for regional growth and transportation emissions to be consistent with regional and State air pollution objectives. With regard to local policies and regulations, the Proposed Project will comply with the City of Los Angeles' Green Building Ordinance standards that reduce emissions beyond a BAU scenario.

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. As a result, the Proposed Project is judged against its consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. As shown in Table V.E-4, the Proposed Project would be consistent with all applicable strategies recommended in the Scoping Plan. As a result, the Proposed Project's cumulative impact on climate change is considered less than significant.

Table V.E-4
Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	Consistent. The Proposed Project is designed to meet City green building standards by including several measures designed to reduce energy consumption.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	Consistent. The Proposed Project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	Consistent. The Proposed Project is designed to meet Cal Green and City Green Building standards and will include several measures designed to reduce energy consumption.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	Consistent. The Proposed Project is expected to have minimal impact on solid waste facilities.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. The Proposed Project would use water-efficient landscaping.

MITIGATION MEASURES

None required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Proposed Project would have a less than significant impact on climate change.

V. ENVIRONMENTAL IMPACT ANALYSIS

F. HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section considers potential risks associated with hazards and hazardous materials resulting from developing residential land uses on the Project Site. The analysis considers potential risks to residents from on-site and off-site sources of hazards and hazardous materials.

Hazardous materials can threaten human health and/or the environment through routine emissions and/or accidental releases. Hazardous materials include materials that are toxic, corrosive, flammable, reactive, irritating and strongly sensitizing. According to the State of California, a hazardous material is defined as:

"a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either: 1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating irreversible illness; or 2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of or otherwise managed."

A Phase I Environmental Site Assessment (Phase I ESA) for the proposed project was prepared by California Environmental Geologists & Engineers, Inc. in August 2003. No changes have been made to the Project Site since the time of the Phase I ESA, which is considered to remain valid. A summary of the Phase I ESA with respect to potential hazards and hazardous materials impacts is included below. The Phase I ESA, which is incorporated herein by this reference, is included in its entirety as Technical Appendix H to this Draft EIR.

The purpose of the ESA was to identify, to the extent feasible pursuant to the processes prescribed in American Society for Testing and Materials (ASTM) E1527-00, recognized environmental conditions in connection with the Project Site. "Recognized environmental conditions" are defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a 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. The term includes hazardous substances and/or petroleum products even under conditions in compliance with laws. The term does not include de minimus conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of

an enforcement action if brought to the attention of appropriate governmental agencies.¹ The Phase I ESA included records review, site reconnaissance, interviews and report preparation.

ENVIRONMENTAL SETTING

Regulatory Framework

A variety of laws and regulations governing the management and control of hazardous substances have been established at the federal, state, and local levels to protect the environment.

Hazardous Materials and Waste Management

The use and storage of hazardous materials and wastes are governed by various federal, state, and local regulations whose jurisdictions and responsibilities sometimes overlap.

Federal

The Federal Resource Conservation and Recovery Act (RCRA) (Title 40 of the Code of Federal Regulations [CFR]) gives the U.S. Environmental Protection Agency (USEPA) the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste by "large-quantity generators" (1,000 kilograms/month or more). Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste, as long as it is at least as stringent as RCRA.

The Federal Occupational Safety and Health Act of 1970, which is implemented by the Federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in Title 29 of the Code of CFR, are designed to promote worker safety, worker training, and a worker's right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California.

¹ American Society for Testing and Materials, ASTM, 2000, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, Designation E1527-00, May 10, 2000.

Title 49 of the CFR specifies additional requirements and regulations with respect to the transport of hazardous materials.² Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements. In addition, vehicles transporting certain types or quantities of hazardous materials must display placards (warning) signs. As previously indicated, transporters of hazardous wastes must be permitted and have an identification number.

State

At the state level, authority for the statewide administration and enforcement of RCRA rests with the California EPA's (Cal-EPA) Department of Toxic Substances Control (DTSC). While the DTSC has primary state responsibility in regulating the generation, storage and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, the DTSC is responsible and/or provides oversight for contamination cleanup, and administers statewide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) deal with the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

The storage of hazardous materials in underground storage tanks (USTs) is regulated by Cal EPA's State Water Resources Control Board (SWRCB), which has delegated authority to the RWQCB and typically on the local level, to the local fire department.

The California OSHA (Cal-OSHA) program is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal-OSHA is very similar to the Federal OSHA program. For example, both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal-OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

The Hazardous Waste Source Reduction and Management Review Act of 1989 require generators of 12,000 kilograms/year of typical/operational hazardous waste to conduct an evaluation of their waste streams every four years and to select and implement viable source reductions alternatives. This Act does not apply to non-typical hazardous waste (such as asbestos and polychlorinated biphenyls). The

² Title 49 of the CFR contains the regulations set forth by the Hazardous Materials Transportation Act of 1975.

California Vehicle Code also states that every motor carrier transporting hazardous materials (for which the display of hazardous materials placards are required or in excess of 500 pounds, transported for a fee, which would require placarding if shipped in greater amounts in the same manner) must have a Hazardous Materials Transportation License issued by the California Highway Patrol.

The management of medical wastes is further governed by regulations of the Medical Waste Management Act. Under these regulations, medical waste generators are required to be registered. Furthermore, all medical waste transporters doing business in California must report information regarding business ownership, location, vehicles, and clients to the California Department of Public Health (CDPH). Only medical waste transporters listed with CDPH are allowed to transport medical waste. All medical waste transporters must carry paperwork issued by CDPH in each vehicle while transporting medical waste.

Local

At the local level, the Los Angeles Fire Department (LAFD) monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also has delegated authority to administer and enforce Federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

Underground Storage Tanks

Underground storage tanks (USTs) are regulated under Subtitle I of RCRA and its implementing regulations, which establish construction standards for new UST installations, as well as standards for upgrading existing USTs and associated piping. After 1998, all non-conforming tanks were required to be either upgraded or closed.

The state's UST program regulations include, among others, permitting USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. Oversight of the statewide UST program is assigned to the SWRCB, which has delegated authority to the RWQCB and typically on the local level, to the fire department. The LAFD administers and enforces federal and state laws and local ordinances for USTs at the Project Site. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

Asbestos-Containing Materials

The Federal EPA has enacted strict requirements on the use, handling, and disposal of asbestos-containing materials (ACM) under the Toxic Substances Control Act (TSCA). These regulations include the phase out of friable asbestos and ACM in new construction materials beginning in 1979. Thus, any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could potentially contain ACM.

The Federal EPA has also established National Emission Standards for Hazardous Air Pollutants (NESHAP) that govern the use, removal, and disposal of ACM as a hazardous air pollutant. The NESHAP regulations mandate the removal of friable ACM before a building is demolished and includes notification requirements prior to demolition. Responsibility for implementing these requirements has been delegated to the State of California, which in turn has delegated the responsibility to the South Coast Air Quality Management District (SCAQMD).

California classifies ACM as hazardous waste if it is friable and contains one percent or more asbestos. Non-friable bulk asbestos-containing waste is considered non-hazardous regardless of its asbestos content and is not subject to regulation. The Cal-EPA Department of Toxic Substances Control (DTSC) regulates the packaging, on-site accumulation, transportation, and disposal of asbestos when it is a hazardous waste. In California, any facility known to contain asbestos is required to have a written asbestos management plan (also known as an Operations and Maintenance Program [O&M Program]).

The SCAQMD implements the NESHAP through its Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. Rule 1403 regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and clean-up procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of ACM-containing structures, asbestos storage facilities, and waste disposal sites. Rule 1403 regulations require that the following actions be taken: (1) a survey of the facility prior to issuance of a permit by SCAQMD; (2) notification of SCAQMD prior to construction activity; (3) asbestos removal in accordance with prescribed procedures; (4) placement of collected asbestos in leak-tight containers or wrapping; and (5) proper disposal.

Lead-Based Paint

While adults can be affected by excessive exposure to lead, the primary concern is the adverse health effects on children. If not detected early, children with high levels of lead can suffer from damage to the brain and nervous system; behavior and learning problems such as hyperactivity, slowed growth, hearing problems; and headaches. Adults can suffer from lead-related effects such as reproductive problems (in

both men and women), high blood pressure and hypertension, nerve disorders, memory and concentration problems, and muscle and joint pain.

The demolition of buildings containing lead-based paints (LBPs) is subject to a comprehensive set of California regulatory requirements that are designed to assure the safe handling and disposal of these materials. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse health exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code.

Oil and Gas

Section 91.7103 of the Los Angeles Municipal Code (LAMC), also known as the Los Angeles Methane Seepage Regulations, sets forth minimum requirements to control methane for buildings and paved areas that are located in a City-designated methane zone or a methane buffer zone. Requirements for new construction within such zones may include site testing for methane gas, installing a barrier (i.e., a membrane shield) between the building and underlying earth, installing a vent system(s) beneath the barrier and/or within the building, and installing a gas (methane) detection system. The Project Site is not located within a City-defined Methane or Methane Buffer Zone.

Worker exposure to methane is regulated by OSHA. This section regulates worker exposure to a “hazardous atmosphere” within confined spaces where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit. Cal-OSHA regulates worker exposure to airborne contaminants (such as hydrogen sulfide) during construction; which compounds are considered a health risk and the exposure limits associated with such compounds; and the protective equipment, workplace monitoring, and medical surveillance required for compliance.

Historic Land Use

The Project Site is composed of two irregularly shaped parcels consisting of approximately 6.2 acres of land. The Project Site is located at 22241 and 22251 Mulholland Drive within a mixed-use area comprised of single-family homes to the north and east, a private parochial high school and convent to the southeast, and commercial development to the southwest. The site is bound by San Feliciano Drive to the north, Mulholland Drive to the south, Girard Reservoir to the east, and single-family residences to the west (see Figures III-2 and III-3).

The Phase I ESA also included the review of the available historical information on the Project Site. These references were reviewed for evidence of activities that would suggest the potential presence of

hazardous substances at the site and to evaluate the potential for the site to be impacted by off-site sources of contamination. Table V.F-1 and the following paragraphs present a chronological summary of the review.

The Project Site is currently occupied by a vacant, derelict two-story single-family residence, shed and kennel. These structures are located in the east-central portion of the site along Mulholland Drive. The remaining portion of the property is undeveloped open space occupied by various native and non-native trees (i.e., coast live oak, California black walnut and Mexican fan palm), shrubs and low-lying ruderal vegetation.

Oil and Gas Field Map

The Phase I ESA included the review of the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Regional Wildcat Map W1-2, dated June 1988. No active or plugged and abandoned oil or gas wells were identified on-site. In addition, no evidence of oil or gas wells or oilfield-related facilities are known to occur within a one-quarter mile radius of the Project Site.

Aerial Photographs and Historical Topographic Maps

Historical aerial photographs and topographical maps were reviewed for information regarding past uses of the Project Site. Aerial photographs were reviewed for the following years: 1928, 1940, 1952, 1965, 1976, 1989, 1994 and 2003. Historical topographic maps were reviewed for the following years: 1903 and 1952.

**Table V.F-1
Historical Land Use**

Time Period	Land Use	Reference
1903 to 1927	<ul style="list-style-type: none"> Undeveloped, vacant land. 	<ul style="list-style-type: none"> Historical Topographic Map
1928 to 1951	<ul style="list-style-type: none"> Project Site is developed with a structure and bounded on the south by Mulholland Drive. LADWP (Girard) Reservoir visible to the east. 	<ul style="list-style-type: none"> Aerial Photographs
1952 to 1964	<ul style="list-style-type: none"> Project Site is developed with two structures and bounded on the south by Mulholland Drive. LADWP (Girard) Reservoir visible to the east. Louisville High School visible to the south, across Mulholland Drive. 	<ul style="list-style-type: none"> Aerial Photograph Historical Topographic Map
1965 to 1988	<ul style="list-style-type: none"> Project Site is developed with two structures and bounded on the south by Mulholland Drive. LADWP (Girard) Reservoir visible to the east. Louisville High School visible to the south, 	<ul style="list-style-type: none"> Aerial Photographs Historical Topographic Map

	across Mulholland Drive. <ul style="list-style-type: none"> • San Feliciano Drive and residences visible to the north • Areas surrounding the Project Site to the north, east and west consists of residential property 	
1989 to present	<ul style="list-style-type: none"> • Project Site is developed with two structures (currently vacant) and bounded on the south by Mulholland Drive. • LADWP (Girard) Reservoir visible to the east, reservoir appears to be dry. • Louisville High School visible to the south, across Mulholland Drive. • San Feliciano Drive and residences visible to the north • Areas surrounding the Project Site to the north, east and west consist of residential property 	<ul style="list-style-type: none"> • Aerial Photographs • Site Reconnaissance

On the 1903 historical topographic map, reprinted in 1913, the Project Site and all adjacent property are represented as undeveloped. In the 1928 aerial photograph, the Project Site is developed with one structure. The remainder of the property is undeveloped. The site is bounded to the south by Mulholland Drive. The LADWP (Girard) Reservoir is visible to the east. Immediate adjacent properties were observed as undeveloped, vacant land.

On the 1952 historical topographic map (Canoga Park 7.5-minute USGS quadrangle), revised in 1967, the Project Site is shown developed with two structures. The remainder of the property is undeveloped. A USGS-designated blue line stream trending north-south across the western portion of the property is shown. The blue line stream has been modified on-site and off-site, since the 1967 revision, such that northerly flows are now intercepted under Mulholland Drive and conveyed into a sub-drain and no longer flow onto the Project Site. San Feliciano Drive is present to the north, with residential development beyond and to the west.

In the 1989 aerial photograph, no land use changes from the prior aerial photograph were observed on the Project Site or surrounding properties, except that the Girard Reservoir appears to be dry.

Sanborn Maps

Environmental Data Resources, Inc. (EDR) was contacted to determine if any Sanborn Maps included coverage of the Project Site. Sanborn Maps (or fire insurance maps) are detailed city plans showing building footprints, construction details, use of structure, street address, etc. The maps were designed to assist fire insurance agents in determining the degree of hazard associated with a particular property. Sanborn Maps have been produced from approximately 1867 to the present for commercial, industrial and

residential sections of approximately 12,000 cities and towns in the United States. According to EDR, no coverage exists for the Project Site.

Site Reconnaissance

On July 28, 2003, a reconnaissance-level visit was conducted of the Project Site. The site reconnaissance consisted of the observation and documentation of existing site conditions and the nature of the neighboring property development, including the completion of an Environmental Field Reconnaissance Questionnaire.

Use of Hazardous Substances

No evidence of the past use, treatment, storage, disposal or generation of hazardous substances was observed on the Project Site.

Storage Tanks

No evidence of existing underground storage tanks (USTs), clarifiers, sumps, grease interceptors or aboveground storage tanks (ASTs) was observed on the Project Site.

Containers of Hazardous or Unidentified Substances

One empty 55-gallon drum was observed in the vicinity of the abandoned kennel. The 55-gallon drum reportedly once contained drinking water for animals. No other evidence of containers of hazardous or unidentified substances was observed on the Project Site.

Polychlorinated Biphenyls (PCBs)

No visual evidence of PCB containing transformers or equipment was observed on the Project Site.

Solid Waste Disposal

No evidence of on-site disposal or landfill of solid waste material was observed on the Project Site.

Asbestos Containing Building Materials (ACM)

Sampling of suspect asbestos containing material (ACM) was not included in the scope of the Phase I ESA. However, due to the date of construction of the subject buildings, it is considered likely that the building materials contain ACM.

Wastewater Disposal Systems

An on-site sewage disposal (septic) system is located adjacent to the north side of the existing vacant residence. No other evidence of wastewater treatment or disposal systems was observed at the Project Site.

Radon

Radon assessment was not included in the scope of the Phase I ESA. However, the EDR research report indicates the levels of radon at 63 sites located within Los Angeles County were below one picoCurie per liter (pCi/L). This concentration is well below the Federal Action Level of four pCi/L.

Lead

Sampling of suspect lead in paint was not included in the scope of the Phase I ESA. Lead content in paint was significantly reduced in 1977. However, due to the date of construction of the subject buildings, it is considered likely that lead-based paint was utilized on-site.

On-site Wells

No evidence of dry wells, irrigation wells, abandoned wells, monitoring wells or other wells was observed on the Project Site.

Unusual Odors

No evidence of strong, pungent or noxious odors was noted on the Project Site.

Stressed Vegetation

No evidence of stressed vegetation, as a possible result of hazardous material releases, was observed on the Project Site.

Stained Soil or Pavement

No evidence of staining or residue was observed on the Project Site.

Pits, Ponds or Lagoons

No evidence of pits, ponds and/or lagoons was observed on the Project Site.

Potable Water Supply

The City of Los Angeles Department of Water and Power (LADWP) supplies water to the Project Site.

Other Condition of Concern

No other conditions of environmental concern regarding potential sources for soil and/or groundwater contamination were observed on the Project Site.

Records Review

A search of selected government databases was conducted using the GeoCheck[®] Report environmental database report system, prepared by Environmental Data Resources, Inc (EDR). The report meets the government records search requirements of Government Code 65962.5 and ASTM E1527-00 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. The database listings were reviewed within the specified radii established by the ASTM E1527-00.

Project Site

The Project Site was not identified on the EDR report in any of the database listings.

Off-site

Federal NPL List: The Environmental Protection Agency's (EPA) National Priorities List (NPL) of uncontrolled or abandoned hazardous waste sites was reviewed for properties within a one-mile radius of the Project Site. To appear on the NPL, a property must have met or surpassed a predetermined hazard ranking system score, been chosen as a state's top priority site, pose a significant health or environmental threat, or be a site where the EPA has determined that remedial action is more cost effective than removal action. The database search did not identify any NPL sites within one mile of the Project Site.

Federal CERCLIS List: The EPA's Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) listings were reviewed to determine if sites within 0.50 mile of the Project Site are listed for investigation. The CERCLIS database identifies hazardous waste sites that require investigation and possible remedial action to mitigate potential negative impacts on human health or the environment. The database search did not identify any state equivalent CERCLIS facilities within 0.50 miles of the Project Site.

Federal RCRA List: The current Resource Conservation Recovery Act (RCRA) Notifiers List was reviewed to determine if RCRA treatment, storage, or disposal sites (TSDs) are located within 0.50 miles of the Project Site. The database search did not identify any RCRA TSD facilities within 0.50 miles of the Project Site.

The RCRA Corrective Action Sites List is maintained for sites that are undergoing "a corrective action." A corrective action order is issued when there has been a release of hazardous waste constituents into the

environment from a RCRA facility. The database search did not identify any RCRA Corrective Action facilities within a mile of the Project Site.

The RCRA regulated hazardous waste generator notifiers list was reviewed to determine if RCRA generator facilities are located on any properties adjoining the Project Site. The database search did not identify any RCRA generators located adjacent to the Project Site.

Federal RCRIS List: The EPA's Resource Conservation and Recovery Information System (RCRIS) listings were reviewed to determine if sites within 0.25 mile of the Project Site are listed. The RCRIS database identifies hazardous waste sites that generate, store, treat or dispose of hazardous waste as defined by the Act and as a part of on-going operations. The database search identified three RCRIS listings located at 22243, 22251 and 22295 Mulholland Highway respectively, approximately 0.25 miles southeast of the Project Site. The facility at 22243 Mulholland Highway is Village Cleaners, 22251 Mulholland Highway is Woodland 1 Cleaners and 22295 Mulholland Highway is a Shell Oil Company gas station. Due to the distance of the listed facilities from the Project Site, these facilities are unlikely to have the potential to adversely impact the Project Site and are not considered to be recognized environmental conditions.

Emergency Response Notification System (ERNS): The EPA's database of emergency response actions. The database search identified one ERNS listing located at Thomas Permuter & Associates, 22231 Mulholland Highway, approximately 0.25 miles southeast of the Project Site. Permuter & Associates use photochemicals, producing photoprocessing waste that is subsequently sent to an off-site transfer station for recycling. Due to the distance of the listed facility from the Project Site, this facility is unlikely to have the potential to adversely impact the Project Site and is not considered to be a recognized environmental condition.

Toxic Release Inventory System (TRIS): The EPA's index of all facilities that have had or may be prone to toxic material releases. The database search did not identify any TRIS facilities within 0.125 miles of the Project Site.

Department of Toxic Substances Control (CALSITES) Sites: The Department of Toxic Substances Control (DTSC) CALSITES database contains potential or confirmed hazardous substance release properties. The database search did not identify any CALSITES facilities within a mile of the Project Site.

Solid Waste Landfill Facilities: This database, provided by the Department of Consumer and Regulatory Affairs, consists of open, closed and inactive solid waste disposal facilities and transfer stations (SWL). The database search did not identify any solid waste disposal facilities and/or transfer stations within a mile radius of the Project Site.

Underground Storage Tank (UST) Sites: The California State Water Resources Control Board (SWRCB) Underground Storage Tank inventory list was reviewed to determine if any USTs are located adjacent to the Project Site. The database search identified one UST listing located at the Shell gas station, 22295 Mulholland Highway, approximately 0.25 miles southeast of the Project Site. Due to the distance of the listed facility from the Project Site, this facility is unlikely to have the potential to adversely impact the Project Site and is not considered to be a recognized environmental condition.

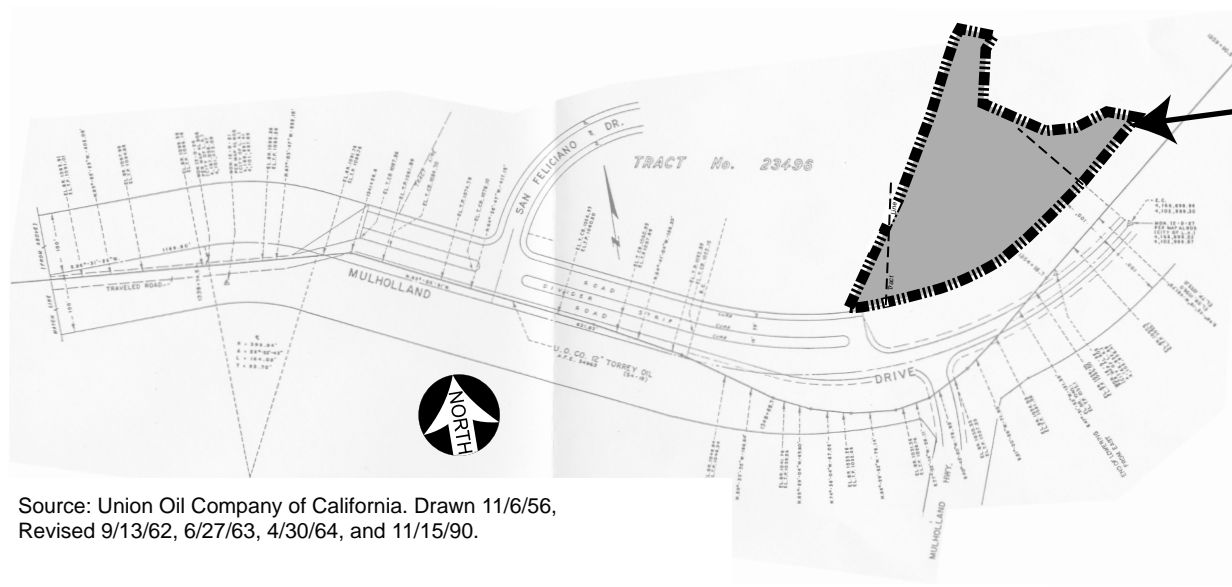
Leaking Underground Storage Tank (LUST) Sites: The EPA maintains lists of information pertaining to reported leaking underground storage tanks (LUSTs) in the state. LUST facilities that have been closed by regulatory agencies are not described within the report. The database search did not identify any LUST sites within a mile of the Project Site.

The following governmental agencies were contacted to determine if they had any records relating to the Project Site:

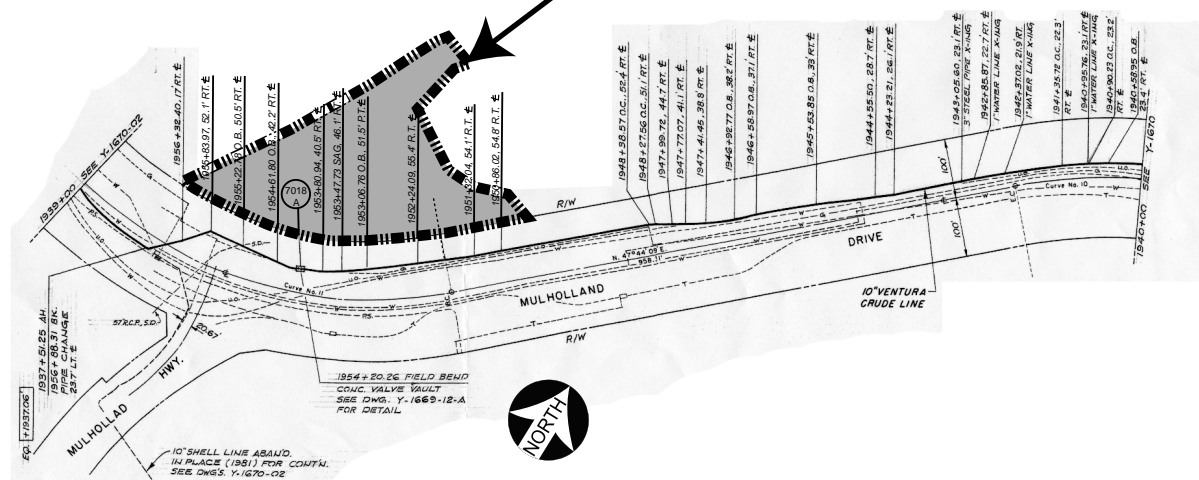
- California Regional Water Quality Control Board, Los Angeles Region;
- South Coast Air Quality Management District;
- City of Los Angeles Department of Building and Safety;
- County of Los Angeles, Health Department; and
- County of Los Angeles, Fire Prevention Unit.

The search disclosed that these agencies have no records on file for the Project Site address.

A letter was also sent to the Underground Service Alert of Southern California (Dig Alert) on October 19, 2005, requesting information regarding buried utilities and/or pipelines in the project vicinity. A listing received on October 20, 2005 indicates that two pipelines that convey crude oil from oil fields in Ventura County south to refineries in the Wilmington area of Los Angeles County, run in the shoulder right-of-way of Mulholland Drive along the southern border of the Project Site. One is the 12-inch ConocoPhillips Torrey Oil pipeline; the other is the Crimson Pipeline. The locations of these pipelines in relationship to the Project Site are shown in Figure V.F-1. Warnings of the existence of the pipelines are posted in the Mulholland Drive right-of-way, adjacent to the Project Site (see Photograph S, Figure V.F-2). Recent erosion in the right-of-way has exposed an unidentified pipeline in the Mulholland Drive right-of-way (see Photograph T, Figure V.F-2). While it is possible the exposed pipeline is one of the two oil pipelines, it should be noted that there are various other domestic utilities such as water, natural gas and telecommunications located in the same general area.



Source: Union Oil Company of California. Drawn 11/6/56, Revised 9/13/62, 6/27/63, 4/30/64, and 11/15/90.



Source: Crimson Pipeline, LP. Drawn 3/21/44,
Revised 7/15/65 and 01/82.

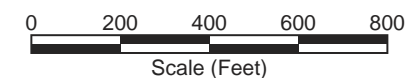




Photo S



Photo T

Source: CAJA Environmental Services LLC, 2015.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G of the State CEQA Guidelines

In accordance with Appendix G of the *CEQA Guidelines*, the Project could have a potentially significant impact upon hazards and hazardous materials if it were to result in one or more of the following:

- (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 for people residing or working in the project area;
- (f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area;
- (g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and
- (h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

City of Los Angeles CEQA Thresholds Guide

The *L.A. CEQA Thresholds Guide* requires the hazards analysis to address the following areas of study: (1) risk of upset/emergency preparedness; and (2) human health hazard.

The first area of study is addressed in this section, while the second is for pipelines, storage fields for above ground tanks, solid waste facilities, waste water treatment plants, major utility transmission, land uses with recognized vector problems, or facilities that use hazardous waste in sufficient quantities. The Project would not include those uses. Thus, no further analysis of this issue is required.

Based upon criteria established in the L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- (a) The regulatory framework;
- (b) The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of hazardous substance;
- (c) The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- (d) The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

Hazards & Hazardous Materials Issues Not Analyzed Further

As discussed in the Initial Study (included in Appendix A), the Proposed Project includes development of residential uses. The types of hazardous materials associated with routine, day-to-day operation of the Project would include landscaping chemicals that would be used in quantities typical for landscaped residential developments and typical cleaning solvents used for janitorial purposes. Typically, residential landscaping materials and household cleaning supplies are approved for use by the State of California, such that the transport, use and disposal of these materials would not pose a significant hazard to the public or the environment. Therefore, although the Project Site is located within one-quarter mile of a school, Project impacts related to this issue would be less than significant, and no further analysis of this issue is required.

As discussed above, a search of selected government databases has demonstrated that the proposed Project Site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the Project would not result in impacts related to being located on a site that is included on a list of hazardous materials sites. Thus, no further analysis of this issue is required.

As discussed in the Initial Study, the Project Site is not within an airport use plan, or within two miles of a public airport, public use airport, or private airstrip. Therefore, the Project would not expose persons to a safety hazard related to airports. No further analyses of these issues are required.

As discussed in the Initial Study, the Proposed Project includes development of residential uses and is located in a mountain fire district and a Very High Fire Hazard Severity Zone (VHFHSZ) based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the County Fire Code. The Project Site consists of mostly level or gently sloping terrain. Additionally, the Project Site is surrounded by suburban development and is not immediately adjacent to wildlands. There are no severe site limitations that would restrict access for fire fighting equipment. Furthermore, water mains are available adjacent to the site. While the Project Site is located beyond the recommended 1.5-mile response distance from the nearest fire station, the requirement to provide automatic fire sprinkler systems would mitigate this concern. When considered together, these factors suggest that the Proposed Project would not expose people or structures to a greater than average risk of loss, injury or death involving wildland fires. Therefore, Project impacts related to this issue would be less than significant, and no further analysis of this issue is required.

Project Impacts

Construction Impacts of the Proposed Project

Asbestos-Containing Materials (ACMs)

Demolition of the buildings on-site, which were built prior to the ban on use of asbestos as building insulation, could release asbestos-containing materials present in the structures. Exposure to workers or residents in the surrounding community to ACMs during demolition would be a potentially significant impact.

Prior to the demolition activities, a complete asbestos survey must be conducted to identify all sources of asbestos. This activity is required by the USEPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation and the South Coast Air Quality Management District's (SCAQMD's) Rule 1403. Bulk samples of all materials which are suspected of containing asbestos will be collected and analyzed for asbestos content. Asbestos removal is stringently controlled by Federal Regulations and SCAQMD Rule 1403. Removal of asbestos in a building is not unusual and can be readily accomplished.

In accordance with the EPA's NESHAP regulation and SCAQMD's Rule 1403, all materials, which are identified as ACMs must be removed by a trained and licensed asbestos abatement contractor. The asbestos removal operations must be conducted in accordance with CAL-OSHA Asbestos for the Construction Industry Standard, SCAQMD and EPA rules and regulations and industry standards. The contractor selected for the removal process must be chosen based on experience, reputation and relationship with local agencies such as SCAQMD and OSHA regional offices.

Generally, asbestos removal operations are low risk. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The SCAQMD has very specific regulations for asbestos emissions. Provided the removal and disposal of ACMs from the Project Site follows the various required guidelines described above (as specified in Regulatory Compliance Measure F-1), the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of ACMs (hazardous materials) into the environment. Therefore, demolition-related impacts relative to ACMs would be less than significant.

Lead-Based Paint (LBP)

Based on the age of the structures, the potential exists for such structures to contain lead-based paint. Exposure to workers to lead paint during demolition structures would be a potentially significant impact. A qualified lead-paint abatement consultant would be required to comply with applicable state and federal rules and regulations governing lead paint abatement. Such regulations to be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). Provided that abatement rules and regulations are followed (as specified in Regulatory Compliance Measure F-2), hazardous materials impacts caused by exposure to LBP would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions. Therefore, demolition-related impacts relative to lead-based paint would be less than significant.

Oil Pipelines

There is a potential for the identified crude oil pipelines in the shoulder of Mulholland Drive to be ruptured during excavation and grading operations for the Proposed Project. Since such a rupture could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions (i.e., grading) involving the release of hazardous materials (i.e., crude oil) into the environment, this is a potentially significant impact. However, there are standard operating procedures for construction in the vicinity of known pipelines, generally consisting of notification and marking requirements, and including contacting Underground Service Alert of Southern California (Dig Alert) a minimum of two full working days (48-hours) prior to the commencement of earthmoving activities on the Project Site to obtain a listing of underground services and utilities. With contractor compliance with this measure (as specified in Mitigation Measure F-3), the Project's construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the potential risk pipeline rupture, and, as such, impacts would be less than significant.

Operational Impacts of the Proposed Project

Oil Pipelines

Of the three major means of transporting crude oil from the oil field to the refinery (i.e., pipeline, ocean going tankers or trains), pipelines have by far the best safety record. Pipelines are regularly monitored by the owner/operators using a combination of remote sensing and visual inspection. Also, most pipelines are fitted with computer monitored and operated check valves that can automatically shut down the flow of crude should a leak or rupture occur, thus minimizing the quantity of crude that might be released to the environment. The Crimson Pipeline has been located in the Mulholland Drive right-of-way adjacent to the Project Site since at least 1944 (see Figure V.F-1), while the Union Oil pipeline has been in place since at least 1956 (see Figure V.F-1). Based on these considerations, a major leak or rupture of the adjacent pipelines in the vicinity of the Project Site is considered to be only of a remote possibility. Furthermore, these pipelines run from Ventura County to refineries in the Wilmington area, through a variety of residential communities. There is nothing unique in either the Project or Project Site that would cause the future residents to be exposed to greater hazards or risk of upset than the residents of surrounding communities through which these pipelines also run. Therefore, the operational risk of upset associated with the Project would be considered less than significant.

CUMULATIVE IMPACTS

Development of the Proposed Project in conjunction with other anticipated growth in the general area is likely to result in the development of residential and commercial uses. The only specific cumulative development project that is currently being proposed within a 1.5-mile radius of the Project Site is the Clarendon Street Apartments project. This project would develop 335 residential units near the intersection of Topanga Canyon Boulevard and the US 101 (Ventura) Freeway, approximately 1.3 miles from the Project Site. As is typical of residential developments, this cumulative project would be expected to utilize common household products that, while potentially hazardous, have typically been approved as safe by the State of California when used according to instructions. Thus, cumulative impacts related to risk of upset from release of hazardous materials at this residential cumulative development site would be expected to be less than significant. As is the case with the Proposed Project, future cumulative development projects located within a designated wildland fire zone would be required by their respective local jurisdictions to mitigate their individual impacts by compliance with standard Fire Department requirements. Therefore, no significant cumulative impacts pertaining to wildfire hazards would be anticipated.

The Proposed Project together with potential future cumulative growth in the vicinity would not create a hazardous materials impact that is cumulatively considerable, as each development project would have to comply with site specific development standards and state hazardous materials handling and transporting

regulations. As a result, it is expected that all potentially hazardous materials used by cumulative development projects would be stored and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations.

As such, cumulative impacts related to hazards and hazardous materials for the concurrent development of the Project and future cumulative growth in the vicinity would be less than significant, and the Project's overall contribution would not be cumulatively considerable.

MITIGATION MEASURES/REGULATORY COMPLIANCE MEASURES/PROJECT DESIGN FEATURES

Regulatory Compliance Measures

- F-1** Prior to the issuance of the demolition/renovation permits, the Project Applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403, as well as other state and federal regulations.
- F-2** Prior to issuance of permits for any demolition/renovation activity involving a particular structure, a lead-based paint assessment of each existing structure shall be conducted. Lead-based paint found in any buildings shall be removed and disposed of as a hazardous waste in accordance with all applicable regulations.

Mitigation Measures

The following measure is recommended to ensure that grading activities will not accidentally rupture the crude oil pipelines that are located in the Mulholland Drive right-of-way:

- F-3** A minimum of two full working days (48-hours) prior to the commencement of earthmoving activities on the Project Site, the grading contractor shall contact Underground Service Alert of Southern California (Dig Alert) to obtain a listing of underground utilities in the vicinity of the Project Site. The location of all pipelines in the vicinity of proposed grading shall be clearly marked prior to commencement of grading activities.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts associated with hazards and hazardous materials would be less than significant.

V. ENVIRONMENTAL IMPACT ANALYSIS

G. LAND USE AND PLANNING

INTRODUCTION

This section provides an analysis of the Project's potential land use impacts based upon two criteria: physical compatibility with surrounding land uses and consistency with applicable land use policies of agencies with jurisdiction over the Project Site.

ENVIRONMENTAL SETTING

The 6.2-acre Project Site is located in the Los Angeles City community of Woodland Hills. It is located approximately one mile south of the Ventura Freeway (US-101), approximately 11 miles from the San Diego Freeway (I-405) and approximately 25 miles northwest of downtown Los Angeles. The irregularly shaped Project Site is bound by San Feliciano Drive to the north, Mulholland Drive to the south, Girard Reservoir to the east, and single-family residences to the west. The regional location of the Project Site is presented in Figure II-1, while its local vicinity is indicated on Figure II-2.

Existing Land Uses

A vacant two-story single-family residence, sheds and an aged kennel currently occupy the proposed Project Site. These structures are located at the east-central portion of the property along Mulholland Drive. The remaining portion of land is undeveloped open space occupied by various native and ornamental trees, shrubs, low-lying forbs and grasses. The proposed Project Site is surrounded by a chain link fence and consists of two parcels of land.

Surrounding Land Uses

Properties to the north, east and west of the Project Site consist of one- and two-story single-family residences. These properties are all within the City of Los Angeles and are predominantly zoned R1 (Residential One-Family) with a Height District Designation of "1". In addition, the Girard Reservoir and the City of Los Angeles Department of Water and Power Pumping Station are located to the northeast of the Project Site and are also zoned R1-1. The properties to the south of the Project Site consist of a private high school and convent, undeveloped land, a two-story commercial office building with a surface parking lot and a strip mall. The Louisville High School and Convent property is zoned RE15-1-H, houses multiple structures and contains a surface parking lot that parallels Mulholland Drive. The two-story commercial office building, Mulholland Plaza, is located at the southwest corner of the intersection between Mulholland Drive and Mulholland Highway. Approximately 365 feet south of the Project Site, along Mulholland Highway, the City of Calabasas begins. The strip mall, Gelson's Village Calabasas, which is located in the jurisdiction of the City of Calabasas and is adjacent to Mulholland Plaza, consists of retail and commercial stores including a Gelson's Supermarket, yoga studio, Chase Bank, restaurants, and dry cleaners. Adjacent to Gelson's Village Calabasas is a Shell gas station.

Regulatory Framework

Regional Plans

Southern California Association of Governments

The Southern California Association of Governments (SCAG) functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

Compass Blueprint Growth Vision Report/Compass Blueprint 2% Strategy Areas

The Compass Blueprint Growth Vision, adopted by SCAG as part of its June 2004 Southern California Compass Growth Vision Report, is an implementing mechanism for the regional growth strategies outlined in the SCAG's 1996 Regional Comprehensive Plan and Guide (RCPG). The Compass Growth Vision is intended to provide a strategy to accommodate the projected 24 million residents expected to live in the region by 2035 while balancing valuable quality of life goals. The Compass Vision emphasizes focusing growth in existing and emerging centers and along major transportation corridors, creating significant areas of mixed-use development and walkable communities, targeting growth around existing and planned transit stations, and preserving existing open space and stable residential areas.

Four principles were established for the Compass Blueprint Growth Vision Report that are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. It is SCAG's intention that decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies are also provided as a way to achieve each of the principles, as summarized below.

- *Principle 1. Improve mobility for all residents.* Strategies to support Principle 1 include: (1) encourage transportation investments and land use decisions that are mutually supportive; (2) locate new housing near existing jobs and new jobs near existing housing; (3) encourage transit-oriented development; and (4) promote a variety of travel choices.
- *Principle 2. Foster livability in all communities.* Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote "people scaled," pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.
- *Principle 3. Enable prosperity for all people.* Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.

- *Principle 4. Promote sustainability for future generations.* Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and (d) utilize “green” development techniques.

The Compass Blueprint 2% Strategy is a guideline for how and where the Growth Vision can be implemented. It calls for moderate changes to current land use and transportation trends in 2 percent of the land area of the region, known as the 2% Strategy Opportunity Areas. These areas are defined as having a high potential to implement projects, plans, and/or policies consistent with the Compass principles that would result in the greatest progress towards economic, mobility, livability and sustainability benefits to local neighborhoods. The Project Site is not located in a Compass Blueprint 2% Strategy Area.

Regional Comprehensive Plan

SCAG has also prepared the 2008 Regional Comprehensive Plan (2008 RCP) in response to SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.¹ The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the Compass Growth Vision Report and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced the Regional Comprehensive Plan and Guide (RCPG) for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the Regional Transportation Plan (RTP) (discussed below) and the Compass Growth Vision Report.

2012-2035 Regional Transportation Plan/Sustainable Communities Strategy

¹ 2008 Regional Comprehensive Plan, SCAG, <http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP>.

On September 30, 2008, SB 375 was instituted to help achieve AB 32² goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for the California Air Resources Board (CARB) to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.³ For the area under the SCAG jurisdiction, including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035. On February 15, 2011, CARB's Executive Officer approved the final targets.⁴

On April 4, 2012, the Regional Council of SCAG adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (2012-2035 RTP/SCS). For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region's residents and visitors. While mobility is a vital component of the quality of life that this region deserves, it is by no means the only component. SCAG has placed a greater emphasis than ever before on sustainability and integrated planning in the 2012–2035 RTP/SCS, whose vision encompasses three principles that collectively work as the key to the region's future: mobility, economy, and sustainability.

The 2012–2035 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS) as set forth by the Federal Clean Air Act. As such, the 2012–2035 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2023–2035 time frame and clear steps to move toward this objective. This is especially critical for the goods movement system. The development of a world-class, zero- or near-zero-emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The 2012–2035 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy

² AB 32 was signed into law in 2006 and focuses on achieving GHG emissions equivalent to Statewide levels in 1990 by 2020.

³ California Air Resources Board, *Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375*, <http://www.arb.ca.gov/cc/sb375/notice%of%20decision.pdf>.

⁴ CARB, *Executive Order No. G-11-024, Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375*.

will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, greenhouse gas (GHG) reduction, and economic development.

For the first time, the 2012–2035 RTP/SCS includes a significant consideration of the economic impacts and opportunities provided by the transportation infrastructure plan set forth in the 2012–2035 RTP/SCS, considering not only the economic and job creation impacts of the direct investment in transportation infrastructure, but also the efficiency gains in terms of worker and business economic productivity and goods movement. The 2012–2035 RTP/SCS outlines a transportation infrastructure investment strategy that will benefit Southern California, the state, and the nation in terms of economic development, competitive advantage, and overall competitiveness in the global economy in terms of attracting and retaining employers in the Southern California region.

The 2012–2035 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its 22 million residents by 2035. More importantly, the RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and array of open spaces for future generations.

The 2012-2035 RTP/SCS also includes an appendix listing examples of measures that could reduce impacts from planning, development, and transportation.⁵ It notes, however, that the example measures are “not intended to serve as any kind of checklist to be used on a project-specific basis.” Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

South Coast Air Quality Management District

Air Quality Management Plan

The Project is also located within the South Coast Air Basin (Basin) and is, therefore, within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the Air Quality Management Plan (AQMP), and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

⁵ SCAG, *Final PEIR, 2012-2035 RTP/SCS, Appendix G*, http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and vehicle miles traveled (VMT). Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

Air quality impacts of the Project and consistency of the Project with the AQMP are analyzed in Section V.C, Air Quality, of this Draft EIR.

Los Angeles County Metropolitan Transportation Authority

Congestion Management Plan

The Congestion Management Plan (CMP) for Los Angeles County, adopted in 2010, is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects, which are eligible to compete for state gas tax funds. Within Los Angeles, the Los Angeles County Metropolitan Transportation Authority (Metro) is the designated congestion management agency responsible for coordinating the CMP.

The Project's potential impacts with respect to the CMP are analyzed in Section V.I, Transportation and Traffic, of this Draft EIR.

Local Plans

City of Los Angeles General Plan

The City of Los Angeles General Plan (the General Plan), adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements. The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the citywide elements. The citywide elements

address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation, and provides guidance for future updates to the various elements of the General Plan, but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans.

Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan

The Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan (the "Community Plan") is one of 35 Community Plans established for different areas of the City that are intended to implement the policies of the General Plan Framework. Together, the plans make up the Land Use Element of the City of Los Angeles General Plan. The Community Plans are intended to promote an arrangement of land uses, streets and services, which will encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The Community Plan is also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of Los Angeles and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community.

The Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan area contains 17,887 acres, which is approximately six percent of the land in the City of Los Angeles. The plan area is generally bounded by Roscoe Boulevard to the north, Corbin Avenue to the east, unincorporated Los Angeles County and the City of Calabasas to the south, and the City of Hidden Hills and unincorporated Ventura County to the west. Within the City, the communities of Chatsworth-Porter Ranch, Reseda-West Van Nuys, and Encino-Tarzana surround the plan area.

A diverse natural and socioeconomic landscape characterizes this Community Plan area. Dominant on the natural landscape are the Simi Hills of West Hills, the hillsides of the Santa Monica Mountains and the Chalk Hills of Woodland Hills, and the valley plain in Canoga Park and Winnetka. Initially an agricultural cattle oriented community, the area has undergone substantial residential and commercial development over the last 70 years. As agriculture gave way to industry, the aerospace industry transformed this portion of the City. Today, the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area offers a diverse range of housing opportunities and is the economic hub of the San Fernando Valley. The Woodland Hills portion of the Community Plan area, within which the Project Site is located, contains a variety of predominantly single-family homes and includes Pierce Community College and Warner Center.

The Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan (adopted August 17, 1999) designates the Project Site for Low Residential land uses. The Community Plan's Low Residential designation allows a range of residential densities from 4 to 9 dwelling units per acre, with a mid-range of 6.5 units per acre.

Mulholland Scenic Parkway Specific Plan

As described in the Community Plan, the Project Site also lies within the Mulholland Scenic Parkway Specific Plan (Specific Plan) area, which is comprised of Mulholland Drive right-of-way, inner corridor, outer corridor, and the institutional use corridor. The Specific Plan is intended to preserve, protect, and enhance the unique natural and cultural resources in the plan area. To accomplish these goals, the plan undertakes to provide that design and placement of buildings and other improvements preserves, compliments and/or enhances views; minimizes grading; and assures that graded slopes will have a natural appearance. Additionally, the Specific Plan seeks to preserve the natural appearance compatible with the characteristics of the Santa Monica Mountains; to protect prominent ridges, trees and environmentally sensitive areas; and to protect all identified archeological and paleontological resources.

The Project Site is located within 500 feet of the Mulholland Scenic Parkway right-of-way, which is referred to as the Inner Corridor (see Figure IV-2). The Specific Plan contains design requirements and grading restrictions that are applicable to the Inner Corridor and which are subject to a mandated Design Review process.

Los Angeles Municipal Planning and Zoning Code

Development of the Proposed Project is also governed by the applicable land use, zoning and subdivision regulations in the Los Angeles Municipal Code (LAMC), in particular Chapter 1 thereof. The Comprehensive Zoning Plan of the City of Los Angeles (Zoning Ordinance), which is set forth in Section 12.00 et seq. of the LAMC, includes the development standards for the various zoning districts in the City.

The proposed Project Site is zoned R1-1. This is a single-family residential designation with a minimum lot size of 5,000 square feet. The “-1” refers to the Height District, which permits a height range from 33 feet to 45 feet.

Mountain Fire District and Very High Fire Hazard Severity Zone

Section 91.223 the LAMC defines a “Very High Fire Hazard Severity Zone” as any land in the City established by the Board of Forestry and State Fire Marshal and described in Division 72 as Mountain Fire District and Fire Buffer Zones. The entire Project Site is located within a Mountain Fire District and a Very High Fire Hazard Severity Zone. As such, the Project Site is subject to certain provisions in Section 91.7207 of the LAMC relating to Mountain Fire Districts and Very High Fire Hazard Severity Zones that, with certain exceptions, require residential buildings to have enclosed under-floor areas and utilities, protect attic openings, and have fire retardant roofing assembly.

City of Los Angeles Hillside Grading Ordinance

The Project Site is subject to the City of Los Angeles Hillside Grading Ordinance. LAMC §17.05.J. requires designs for subdivisions in hillside areas to meet the grading standards established by the Board of Public Works and the grading regulations established by Article 1, Chapter 9 of the LAMC. The

requirements could also include providing a soils report prepared by a Registered Civil Engineer specializing in Soil Mechanics and/or reports on geological investigations.

City of Los Angeles Protected Tree Ordinance

In April 2006, the City of Los Angeles' Oak Tree Ordinance was amended to become the "Protected Tree Ordinance." It assures the protection and regulates the removal of four species of native trees, specifically all native oaks (*Quercus* sp., with the exception of *Quercus dumosa*, aka *Q. berberidifolia*, scrub oak), Southern California black walnut (*Juglans californica*), Western (California) Sycamore (*Platanus racemosa*), and California bay laurel (*Umbellularia californica*).

Ordinance 177,404 provides that a protected species tree cannot be removed or relocated without first obtaining a permit from the Board of Public Works. The application for the permit must indicate the location of each protected species tree in the development area to be retained, relocated or removed. Further, the Ordinance requires that for each protected species tree removed, a minimum of two trees of the same species (minimum 15-gallon size) shall be planted and that the size and number of the replacement trees shall approximate the value of the trees to be replaced.

In addition, because the proposed Project Site is within the Mulholland Scenic Parkway Specific Plan area, a minimum of two oak trees (minimum of 36-inch box size) are to be planted for each one that is removed; additionally, any native (non-oak) tree removed must also be replaced at a two for one ratio (minimum of 15-gallon size). Further, a bond must be posted to guarantee the survival of trees which would be maintained, replaced or relocated to assure the existence of continuously living trees for a minimum of three years from the date the bond was posted or the trees were replaced or relocated.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G of the CEQA Guidelines

In accordance with Appendix G of the *CEQA Guidelines*, a project could have a potentially significant impact related to land use and planning if it were to:

- (a) Physically divide an established community.
- (b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- (c) Conflict with any applicable habitat conservation plan or natural community conservation plan.

City of Los Angeles CEQA Thresholds Guide

Based upon criteria established in the *L.A. CEQA Thresholds Guide*, the determination of significance for the Proposed Project's impacts on land use consistency and compatibility shall be made on a case-by-case basis considering the following factors:

Consistency Analysis

- 1. Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site.
- 2. Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

Compatibility Analysis

- 1. The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area.
- 2. The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions.
- 3. The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

Methodology

The analysis examines the Project's consistency with both regional and local plans, adopted for the purpose of avoiding or mitigating an environmental effect. In addition, the analysis examines the Project's compatibility with surrounding uses.

Project Impacts

Physically Divide an Established Community

The potential for the Proposed Project to physically divide an established community is based on a comparison of the existing land uses on and adjacent to the Project Site and the Proposed Project. As previously discussed, the proposed Project Site currently contains a vacant two-story single-family residence, sheds, and an aged kennel with the remaining portion of land undeveloped. The Project Site is bounded on the north, west and east by single-family homes. The properties to the south of the Project Site consist of a private high school and convent, undeveloped land, a two-story commercial building with a surface parking lot, and a strip mall. The Proposed Project would not place a barrier between existing land uses or prevent free movement along existing north-south or east-west corridors. Furthermore, the Proposed Project consists of 19 single-family homes and is similar in land use and density to the existing residences to the north, west, and east of the Project Site. Therefore, the Project would not physically divide any established communities and no impact would occur.

Consistency Analysis

This section analyzes the consistency of the Proposed Project with the provisions and requirements of the applicable regional and local plans and regulations that currently govern development of the Project Site and surrounding areas.

SCAG Regional Comprehensive Plan

The SCAG 2008 RCP does not include any policies that are generally applicable to the Proposed Project. The Proposed Project is not considered regionally significant per SCAG Intergovernmental Review Criteria.

SCAG 2012-2035 RTP/SCS

The SCAG 2012-2035 RTP/SCS plans to concentrate future development and provide higher intensity development, including residential development, in proximity to transit hubs in order to reduce vehicle miles traveled and thereby reduce GHG emissions from personal vehicles. The growth and land use assumptions for the SCS are to be adopted at the jurisdictional level. For the City of Los Angeles, the SCS's Growth Forecast assumes 1,309,900 households in 2008 and anticipates 1,455,700 households in

2020 and 1,626,600 households in 2035.⁶ Accordingly, the Project's 19 units would fit within this growth allocation.

A discussion of the Project's consistency with the relevant policies in the 2012-2035 RTP/SCS is presented on Table V.G-1. As noted previously, the 2012-2035 RTP/SCS includes an appendix listing examples of measures that could reduce impacts from planning, development, and transportation, but cautions that the example measures are not intended to serve as any kind of checklist to be used on a project-specific basis. The RTP/SCS recognizes that different areas within the SCAG region will serve different functions with respect to transportation planning and sustainability. The Project Site is located within an area noted as "suburban" in the RTP/SCS, defined as an area dominated by a single land use type and where residential and retail land uses are separated. While the RTP/SCS focuses on transportation investments in the SCAG region, the Project would be largely consistent with the applicable 2012-2035 RTP/SCS policies, and therefore, no significant impacts would occur.

**Table V.G-1
SCAG RTP/SCS Consistency Analysis**

Goal	Consistency Discussion
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	Consistent. The Project would be an infill residential development in close proximity to neighborhood-serving commercial services, bike routes, and local bus transit. The Project protects the environment by minimizing grading and tree removal and leaving 48.9 percent of the site as undisturbed open space.
Actively encourage and create incentives for energy efficiency, where possible.	Consistent. The Project would comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project would meet or exceed Title 24 standards with compliance with the City's Green Building Ordinance and the Project would also be consistent with the City of Los Angeles Building Code, including the LAGBC, which is designed to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint.
Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Consistent. The Project would be an infill development on a site that is surrounded by single-family residential and commercial retail land uses. The site is adjacent to a transit route (Metro Local Bus Line 169) and is situated near neighborhood-serving retail and commercial services.
Source: Southern California Association of Governments, Regional Transportation Plan/Sustainable Communities Strategy, April 2012.	

⁶ SCAG, 2012-2035 Regional Transportation Plan, Growth Forecast, page 32: http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf.

South Coast Air Quality Management Plan (AQMP)

As discussed in Section V.C (Air Quality) of this Draft EIR, the housing growth resulting from the Proposed Project would be consistent with the SCAG's housing forecasts for the City and the County, and would not increase the local housing within the City or County beyond those already projected by the SCAG. Therefore, the Project would be consistent with the AQMP housing forecasts for Los Angeles County, and would not jeopardize attainment of state and federal ambient air quality standards in the Basin. Based on this information, the Project would not impair (or conflict with) implementation of the AQMP.

Los Angeles County Congestion Management Program (CMP)

As discussed in Section V.I (Traffic/Transportation) of this Draft EIR, the local CMP requires that all CMP intersections be analyzed where a project would likely add 50 or more trips during the peak hours. The nearest arterial CMP monitoring station is located on Topanga Canyon Boulevard at Ventura Boulevard. The Proposed Project would not add 50 or more peak hour trips to this CMP intersection. Therefore, no significant CMP impacts would occur. In addition, the CMP also requires any freeway segment where a project is expected to add 150 or more trips in any direction during the peak hours to be analyzed. The maximum number of directional trips generated by the Project would be 19 total trips during the PM peak hour. As the peak hour trips expected to use the freeway network for Project Site access are less than the freeway threshold of 150 directional trips, no significant project impact to any CMP freeway monitoring location is forecast and no additional freeway analysis is necessary. Therefore, the Project would not conflict with the CMP.

City of Los Angeles General Plan (Framework Element)

The Project's consistency with applicable General Plan Framework Element land use policies is discussed on Table V.G-2. As shown therein, the Project would be consistent with many of the applicable policies, and therefore, no impacts would occur.

**Table V.G-2
Project Consistency with Applicable Policies of the Framework Element**

Objective	Project Consistency
<i>Framework Element: Land Use Chapter</i>	
3.1.7 Allow for development in accordance with the policies, standards, and programs of specific plans in areas in which they have been adopted. In accordance with Policy 3.1.6, consider amending these plans when new transit routes are confirmed and funding is secured.	Consistent. The Project would be developed in accordance with the policies, standards, and programs in the Mulholland Scenic Parkway Specific Plan.
3.2.1 Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be	Consistent. The Project would introduce a single-family residential development in close proximity to public transit (Metro Local Line 169). In addition, the Project Site is located near local neighborhood-serving

Objective	Project Consistency
accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.	commercial and retail services.
3.2.2 Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.	Consistent. The Project would introduce a single-family residential development in close proximity to public transit (Metro Local Line 169). In addition, the Project Site is located near local neighborhood-serving commercial and retail services.
3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	Consistent. The Project provides for development of land use patterns that emphasize pedestrian and/or bicycle access because it would not prohibit or present an obstacle to either mode of transport in the immediate vicinity.
3.2.4 Provide for the siting and design of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	Consistent. The Project Site is located within a mature single-family residential neighborhood. The proposed single-family residential land use of the Project Site would be consistent with surrounding land uses.
3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	Consistent. The Project Site is located within a mature single-family residential neighborhood. The proposed single-family residential land use of the Project Site would be consistent with surrounding land uses. The Project does not propose mixed-use development.
3.5.1 Accommodate the development of single-family dwelling units in areas designated as "Single-Family Residential" on the General Plan Framework Long-Range Land Use Diagram, in accordance with Table 3-1. The density permitted for each parcel shall be identified in the community plans using land use categories specified in Table 3-2.	Consistent. The Project Site is located within a mature single-family residential neighborhood. The proposed single-family residential land use of the Project Site would be consistent the site's existing General Plan land use designation.
3.5.2 Require that new development in single-family neighborhoods maintains its predominant and distinguishing characteristics such as property setbacks and building scale.	Consistent. The Project would incorporate setbacks and building scale that is consistent with the surrounding neighborhood.
<i>Source: City of Los Angeles General Plan, Framework Element.</i>	

*City of Los Angeles General Plan (Community Plan)*Consistency with Community Plan Land Use Designation

The 6.2-acre proposed Project Site is within the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area, which designates the site for Low Residential land uses. The Low Residential designation allows residential densities of up to nine dwelling units per net acre. Based on density allowed under the land use designation, the maximum number of single-family units that could be developed on the site would be approximately 54 units. As the Proposed Project consists of 19 units, it would be consistent with the Community Plan land use designation.

Consistency with Community Plan Policies

As shown in Table V.G-3, the Proposed Project can be found to be consistent with the applicable residential policies of the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan.

Table V.G-3
Project Consistency with Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan
Objectives and Policies

Number	Objective/Policy	Proposed Project
Objective 1-1: Achieve and maintain a housing supply sufficient to meet the diverse economic needs of current and project population to the year 2010		
1-1.1	Maintain an adequate supply and distribution of multi-family housing opportunities in the Community Plan Area.	Consistent. Although the proposed type of residential development is single-family, the Project would not affect the existing supply of multi-family housing in the Community Plan area.
1-1.2	Protect existing single-family residential neighborhoods from new, out-of-scale development.	Consistent. The Community Plan permits single-family residential development at densities up to 9 dwelling units per acre. The Project proposes single-family homes at a density of approximately 3 units per acre. Therefore, the Project is not out-of-scale development.
1-1.3	Protect existing stable single-family and low-density residential neighborhoods from being impacted by the size of commercial development.	Consistent. No commercial development is proposed. Therefore, the Project does not impact existing neighborhoods with commercial development.
1-1.4	Protect the quality of the residential environment through attention to the physical appearance of communities.	Consistent. The Project would be subject to the Design Review procedures and guidelines established by the Mulholland Scenic Parkway Specific Plan. Therefore, the quality of the residential environment will be protected. While the architectural style of the homes has not yet been determined, the selected style(s) will be designed to be compatible with the

Number	Objective/Policy	Proposed Project
		architectural styles already existing in the area and to be consistent with the Specific Plan.
1-1.5	Protect existing stable single-family and low-density residential neighborhoods from encroachment by higher density residential and other incompatible uses.	Consistent. The Community Plan permits single-family residential development at densities ranging up to 9 dwelling units per acre. The Project proposes single-family homes at a density of approximately 3 units per acre. Therefore, the Project is not an encroachment by a higher density residential use.
1-1.6	Promote neighborhood preservation, particularly in existing single-family neighborhoods, as well as in areas with existing multi-family residences.	Consistent. With the exception of one abandoned single-family house, the Project Site is vacant. Therefore, the Project would not remove any current housing in the neighborhood. Furthermore, the Project is a single-family residential development at a compatible density with the surrounding single-family neighborhood.
Objective 1-2: Reduce automobile trips in residential areas by locating new housing in areas offering proximity to goods, services and facilities.		
1-2.1	Locate higher residential densities near commercial centers and major bus routes where public service facilities, utilities and topography will accommodate this development.	Consistent. The Project is a low-density development and is not located within a commercial center. Therefore, this policy is not applicable. The Project is located in close proximity to the Gelson's Village Calabasas shopping center, and the adjacent Mulholland Drive is served by Metro Local Bus Line 169, with a bus stop at the corner of Mulholland Drive and Mulholland Highway. Utilities are available at the Project Site and do not require major extensions. Therefore, service to the Project would be accommodated.
1-2.2	Encourage multiple residential development in commercial zones.	Consistent. The Project is not a multiple residential development and the Project Site is not in a commercial zone. Therefore, this policy is not applicable.
Objective 1-3: Preserve and enhance the character and integrity of existing single-family and multi-family neighborhoods.		
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.	Consistent. The Community Plan permits single-family residential development at densities up to 9 dwelling units per acre. The Project proposes single-family homes at a density of approximately 3 units per acre. Therefore, with respect to density the Project is compatible with the existing residential neighborhood. Also, the Project would be subject to the Design Review procedures and landscaping guidelines established by the Mulholland Scenic Parkway Specific Plan.

Number	Objective/Policy	Proposed Project
		While the architectural style of the homes has not yet been determined, the selected style(s) will be designed to be compatible with the architectural styles already existing in the area and to be consistent with the Specific Plan
1-3.2	Approval of proposals to change residential density in any neighborhood shall be based, in part, on consideration of factors such as neighborhood character and identity, compatibility of land uses, impact on livability, adequacy of services and public facilities, and traffic impacts.	Consistent. The Project would not result in a change in residential density.
1-3.3	Preserve existing views in hillside areas.	Consistent. The Project would not obstruct existing views in hillside areas (see Section V.B, Aesthetics).
Objective 1-4: Provide a diversity of housing opportunities capable of accommodating all persons regardless of income, age or ethnic background.		
1-4.1	Promote greater individual choice in type, quality, price and location.	Consistent. The Project would provide 19 single-family homes with varying lot sizes and plans.
1-4.2	Promote mixed-use housing projects in pedestrian oriented areas.	Consistent. The Project is not a mixed-use development. The Project Site is not in a pedestrian oriented area.
1-4.3	Ensure new housing opportunities minimize displacement of the residents.	Consistent. The Project Site is vacant, with the exception of one abandoned single-family home. No residents would be displaced by the Project.
1-4.4	Increase home ownership options by providing opportunities for development of townhouses, condominiums and similar types of housing.	Consistent. The Project increases home ownership opportunities by developing single-family homes. The Project Site is not zoned for townhome or condominium development.
Objective 1-5: To limit the intensity and density of residential development in hillside areas.		
1-5.1	Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.	Consistent. The existing conditions at the study intersections indicate that all of the analyzed locations are operating at acceptable LOS ranging from LOS A to C. Addition of Project traffic would not change these conditions (see Section V.I, Transportation/Traffic).
1-5.2	Ensure the availability of adequate sewers, drainage facilities, fire protection services and other public utilities to support development within hillside areas.	Consistent. All utility and public services are considered to be adequate to serve the Project without adversely affecting the surrounding neighborhoods (see Section V.A, Impacts Found to be Less Than Significant).
1-5.3	Consider the steepness of the topography and suitability of the geology in any	Consistent. Steepness of topography has been taken into consideration during site

Number	Objective/Policy	Proposed Project
	proposal for development within the Plan area.	planning: 65.6% of the Project Site has slope gradients of 10% or less; 6.9% of the site has slope gradients between 10 and 15%; and 27.5% of the site has slope gradients over 15%. Site development has been located on the gentler slopes to the extent feasible. There are no substantial geologic constraints on the Project Site (see Section V.A, Impacts Found to be Less Than Significant).
1-5.4	Require that any proposed development be designed to enhance and be compatible with adjacent development.	Consistent. The Project would be subject to the Design Review procedures and landscape guidelines established by the Mulholland Scenic Parkway Specific Plan. This will ensure compatibility with adjacent development. While the architectural style of the homes has not yet been determined, the selected style(s) will be designed to be compatible with the architectural styles already existing in the area and to be consistent with the Specific Plan

City of Los Angeles General Plan (Mulholland Scenic Parkway Specific Plan)

As previously stated, the Project Site is located within 500 feet of the Mulholland Scenic Parkway right-of-way, which is referred to as the Inner Corridor. The Specific Plan contains design requirements and grading restrictions that are applicable to the Inner Corridor and which are subject to a mandated Design Review process. There are no Prominent Ridgelines, Public Parklands, Major Vista Points, or Core Trails as defined by the Specific Plan located on the Project Site. There are no known archeological and/or paleontological resources located on the Project Site (see Section V.A, Impacts Found to be Less Than Significant).

Consistency with Specific Plan Regulations

Table V.G-4 presents the Inner Corridor regulations, Mulholland Drive and right-of-way regulations, and landscaping regulations contained in the Specific Plan and contains a discussion of the Proposed Project's consistency with each item.

Table V.G-4
Project Consistency with Mulholland Scenic Parkway Specific Plan

Regulation	Proposed Project
Section 5: INNER CORRIDOR REGULATIONS	
A. Uses	
1. Permitted Uses. All projects visible from Mulholland Drive and located within the inner corridor shall conform to the following regulations: The following uses shall be permitted subject to the following limitations:	
a. One-family dwellings and related parking and accessory buildings	Consistent. The Proposed Project is the development of 19 detached single-family homes. Each home would provide two covered parking spaces in garages per current Municipal Code regulations. In addition, 19 on-site visitor parking spaces would be provided.
b. Fences, gates, and walls	Consistent. In order to reduce the size of the grading footprint, the Project would utilize retaining walls. Refer to Section V.B., Aesthetics, <i>Retaining Wall Impacts</i> for a full discussion. The Project private street would not be gate-controlled.
c. Driveways	Consistent. The Proposed Project would provide a private access road from San Feliciano Drive, ending in a cul-de-sac. Each home within the development would be provided with driveway access off of this private drive, San Feliciano Drive, or Mulholland Drive.
d. Night lighting on private property, provided it is low-height, low-illumination safety lighting of a color similar to incandescent light which is shielded and directed onto the property	Consistent. The Project would use low intensity lighting to minimize potential glare and night sky illumination. Also, see Mitigation Measures B-17 through B-20 for further proposed lighting restrictions.
e. Landscape materials and associated irrigation equipment	Consistent. The Project would include 132,116 sf (48.9% of the Project Site) of undisturbed open space. Landscaping in the Project would adhere to the requirements of the Specific Plan.
f. Core trails	Consistent. No trails are planned for the Proposed Project.
g. Major vista points	Consistent. No major vista points are planned for the Proposed Project.
B. Environmental Protection Measures	
1. Prominent Ridges.	
a. Grading on Prominent Ridges. Notwithstanding Subsection C below, prominent ridges shall not be graded, altered or removed without the prior written approval of the Director pursuant to Section 11. The Director may approve up to 1,000 cubic yards of grading of a prominent ridge after making required findings(refer to the Specific Plan for details).	Consistent. There are no prominent ridges, as defined by the Specific Plan, located on the Project Site. The Project will not affect any prominent ridge.
2. Streams.	

Regulation	Proposed Project
No project shall be constructed and no more than 100 cubic yards of earth shall be moved within 100 feet of either stream bank without the prior written approval of the Director pursuant to Section 11.	Consistent. According to the Canoga Park, California 7.5 Minute Series U.S.G.S. Topographic Quadrangle (1967), an intermittent blue-line stream flows through the central portion of the Project Site. However, this map has not been revised in the last 45 years. Since the last map revision, the on-site portion of the stream has been enclosed in an underground culvert that flows directly into the storm drain in San Feliciano Drive. Therefore, the Project would not grade more than 100 cubic yards of earth within 100 feet of a stream bank.
3. Projects Near Parklands.	
No Project shall be erected and no earth shall be graded within 200 feet of the boundaries of any public parkland without the prior written approval of the Director pursuant to Section 11. The Director may approve the construction of a project or grading within 200 feet of public parkland after making specified findings (refer to the Specific Plan for details).	Consistent. The nearest public parkland is the City of Los Angeles Alizondo Drive Park, located approximately 900 feet to the northeast of the Project Site. According to the Department of Recreation and Parks, this park is non-developed and used for brush clearance once a year. The park is unstaffed, unlocked and open from dawn to dusk. The Proposed Project's development area would not be within 200 feet of the boundaries of this park.
4. Oak Trees.	
No oak tree (<i>Quercus agrifolia</i> , <i>Q. lobata</i> , or <i>Q. virginiana</i>) shall be removed, cut down or moved without the prior written approval of the Director. The Director may approve the removal, cutting down or moving of an oak tree after making the following findings:	Consistent. The Proposed Project would remove 15 <i>Quercus agrifolia</i> (coast live oak) trees, four of which are dead. The Project Applicant would seek a Protected Tree Removal Permit from the City (as required under City of Los Angeles Ordinance 177,404).
a. The removal, cutting down or moving of an oak tree will not result in an undesirable, irreversible soil erosion through diversion or increased flow of surface waters.	Consistent. According to the preliminary hydrology investigation, the existing unimproved Project Site drains onto the Girard Reservoir property, and from there into an existing storm drain in San Feliciano Drive. Currently, during a 50-year storm event, the Project Site would produce a peak flow of 25.7 cubic feet per second (cfs). After project development, the developed site would produce a peak runoff of 30.9 cfs from an equivalent storm. However, while site runoff would increase by 5.2 cfs, the increased runoff would be conveyed to the storm drain in San Feliciano Drive via non-erosive drainage improvements and paved streets. Therefore, the Project would result in less potential for soil erosion from uncontrolled runoff. Furthermore, the oak trees would only be removed to accommodate development. Site preparation in the vicinity of the removed oak trees would include soil stabilization in the form of building construction, pavement or landscaping. Consequently, the removal of the oak trees would not be expected to result in undesirable, irreversible soil erosion through diversion or increased flow of surface waters.

Regulation	Proposed Project
<p>b. The oak tree is not located with reference to other trees or monuments in such a way as to acquire a distinctive significance at said location.</p>	<p>Consistent. There are no National Register or California State Historic Resource properties, California Historical Landmarks, California Points of Historic Interest, or City of Los Angeles Historic-Cultural Monuments on the proposed Project Site, therefore none of the existing oak trees on the Project Site are associated with a monument or have any distinctive historic significance.</p> <p>All 15 oak trees proposed for removal are located within the interior of the Project Site and are not readily visible from off-site locations. The oak trees are primarily situated behind groves of existing trees and/or behind intervening knolls. Additionally, four of the 15 oak trees to be removed have an aesthetic rating of dead (F), four are in poor condition and present a hazard (D), while the remaining seven are rated as fair to good (C and B). Therefore, the individual oak trees slated for removal have not acquired a distinctive significance with reference to the other trees or monuments on the Project Site.</p>
<p>5. Archaeological and Paleontological Resources</p>	
<p>Applicants which propose to grade more than 50 cubic yards per 5,000 square feet of lot area shall submit to the Director a preliminary archaeological and paleontological record search from the State Regional Archaeological Information Centre (UCLA). If this search reveals that the archaeological and paleontological resources may be located on the lot, the applicant shall file an environmental assessment with the Planning Department.</p>	<p>Consistent. The Project would grade an estimated 10,280 cubic yards (3,040 cubic yards of cut and 7,240 cubic yards of fill) over an area of 269,857 sq.ft. Therefore a Phase I Archaeological Survey prepared by W & S Consultants, November 30, 2004, and a South Central Coastal Information Center Records Search dated July 22, 2004 were compiled for the proposed Project Site. These reports indicate no evidence of archaeological resources on the Project Site. However, to insure that impacts to archaeological resources remain less than significant, several Conditions of Approval, which may be required by the City of Los Angeles are listed in the Project's Initial Study (refer to Appendix A, Section IV. Environmental Analysis and in Table II-2 of this Draft EIR).</p> <p>A Paleontologic Resources Evaluation Report, prepared by Paleontologic Resources Management, was also completed. No direct evidence of paleontologic resources was identified on the Project Site. However, to insure that impacts to paleontologic resources remain less than significant, several Conditions of Approval, which may be required by the City of Los Angeles are listed in the Project's Initial Study (refer to Appendix A, Section IV. Environmental Analysis and in Table II-2 of this Draft EIR).</p>
<p>5.C. Grading 1. Grading</p>	

Regulation	Proposed Project
No grading in excess of one cubic yard of earth per four square feet of lot area per lot visible from Mulholland Drive shall be permitted without the prior written approval of the Director pursuant to Section 11. However, corrective grading as determined by the Department of Building and Safety is not to be included in this calculation. The Director may approve grading up to two cubic yards of earth per four square feet of lot area per lot.	Consistent. The Proposed Project would grade an estimated 10,280 cubic yards of soil over the 269,857 sf site. The Specific Plan regulations would permit 67,396 cubic yards of grading ($269,857 \div 4 = 67,396$). Therefore the proposed grading is within the limits of the Specific Plan's grading allowance and does not require the Director's approval of up to two cubic yards per square foot.
2. All graded slopes shall comply with the provisions in Section 10 (Landscaping) of this Specific Plan.	Consistent. A Landscape Plan for the Project in compliance with Specific Plan requirements would be submitted to the Mulholland Scenic Parkway Design Review Board for review and approval. A conceptual landscape plan is included in Section III, Project Description, as Figure III-5.
5.D. Building Standards	
1. Viewshed Protection.	
No building or structure visible from Mulholland Drive on an upslope or downslope lot shall penetrate the viewshed without the prior written approval of the Director pursuant to Section 11. For purposes of this Subsection, the measurement of height shall be as defined in Section 12.03 of the Code and shall be measured from existing natural or finished grade, whichever is lower. The Director may approve a project's penetration into the viewshed after making the following findings:	Consistent. A viewshed analysis (refer to Section V.B. Aesthetics) has determined that due to intervening topography, vegetation and/or structures, one of the Proposed Project's 19 homes would be wholly visible from the Mulholland Drive right-of-way, and three additional homes would be partially visible. All of these homes are downslope from Mulholland Drive (see Table V.G-5 and Figure V.G-4).
a. The Department of Building and Safety has determined that the height of the project does not exceed the height limit allowed in paragraphs a, b or c of subdivision 2.	Consistent. The Proposed Project would comply with the height limits of the Specific Plan.
b. The project is designed to complement the view from Mulholland Drive.	Consistent. The Proposed Project would develop 19 detached single-family homes, along with roadway and landscaping improvements on a 6.2-acre irregularly shaped property that is now occupied by a vacant two-story house, derelict sheds and a kennel. The Project Applicant seeks to design a project that is consistent with predominant character of the architecture of the neighborhood and to provide landscape features that provide natural character and texture within the neighborhood suburban environment. The new homes would have a maximum height of 36 feet, however the architectural style has not yet been determined. Refer to Section V.B. Aesthetics for a full analysis of aesthetic impacts.
2. Allowable Building Heights	

Regulation	Proposed Project
<p>a. On an upslope lot, the height of any building or structure which is visible from Mulholland Drive and which is located within the first 100 feet from the Mulholland Drive right-of-way, shall not exceed 15 feet as indicated on Figure A. When the elevation of the highest adjoining sidewalk or ground surface within a five foot horizontal distance of the exterior wall of a building exceeds grade by more than 20 feet, a building or structure may exceed the height in number of feet prescribed in this paragraph by not more than 12 feet. However, no such additional height shall cause any portion of to exceed a height of 15 feet, as measured from the highest point of the roof structure or parapet wall to the elevation of the ground surface which is vertically below said point of measurement.</p>	<p>Consistent. The Proposed Project would comply with the height limits of the Specific Plan.</p>
<p>b. On an upslope lot, the height of any building or structures which is visible from Mulholland Drive and which is located more than 100 feet up to five hundred feet from the Mulholland Drive right-of-way, shall not exceed 30 feet. When the elevation of the highest adjoining sidewalk or ground surface within a five foot horizontal distance of the exterior wall of a building exceeds grade by more than 20 feet, a building or structure may exceed the height in number of feet prescribed by not more than 12 feet. However, no such additional height shall cause any portion of the building or structure to exceed a height of 30 feet, as measured from the highest point of the roof structure or parapet wall to the elevation of the ground surface which is vertically below said point of measurement.</p>	<p>Consistent. The Proposed Project would comply with the height limits of the Specific Plan.</p>
<p>c. On a downslope lot, the height of any building or structures which is visible from Mulholland Drive and which is located within 500 feet from the Mulholland Drive right-of-way, shall not exceed 40 feet, but in no event shall any building or structure exceed a height that would cause such building or structure to penetrate the viewshed. When the elevation of the highest adjoining sidewalk or ground surface within a five foot horizontal distance of the exterior wall of a building exceeds grade by more than 20 feet, a building or structure may exceed the height in number of feet prescribed by not more than 12 feet. However, no such additional height shall cause any portion of the building or structure to exceed a height of 40 feet, as measured from the highest point of the roof structure or parapet wall to the elevation of the ground surface which is vertically below said point of measurement.</p>	<p>Consistent. Per the analysis found in this Land Use Section, the 19 homes would have a maximum height of 36 feet and no homes on downslope pads were determined to exceed the height limitations of the Specific Plan.</p>

Regulation	Proposed Project
3. Yard Requirements. Notwithstanding Z.A.I Case 1270, buildings and structures located on lots that abut the right-of-way and are 100 or more feet in depth shall be constructed with the following yards:	Consistent. The Project Site is composed of two parcels. Lot 1, which abuts Mulholland is irregularly shaped, and has a lot depth of at least 100 feet at all points. The Project would subdivide the site into 19 single-family home lots, four of which would be located directly on the Mulholland Scenic Parkway ROW. Each of these proposed lots would be more than 100 feet in depth.
a. Front – There shall be a front yard of not less than 20% of the depth of the lot, but which need not exceed 40 feet.	Consistent. The Project is consistent because the proposed lots fronting Mulholland Drive would each have 40-foot front yards, which is greater than 20% of the depth of each lot.
b. Side – There shall be a side yard on each side of the main building of not less than 10% of the width of the lot, but which need not exceed 20 feet.	Consistent. The Proposed Project is consistent because the proposed Lots 1-3 fronting Mulholland Drive would each have side yards of at least seven feet, 10 percent of the lot width, and Lot 4 would have side yards of at least nine feet, 10 percent of the lot width.
4. Fences, Gates and Walls. All fences, gates and walls visible from Mulholland Drive shall be constructed of the following materials: rough-cut, unfinished wood; native-type stone; split-face concrete block; textured plaster surface walls; black or dark green chain-link or wrought iron; or a combination thereof.	Consistent. Although the architectural details have not yet been determined, the Project would be subject to review and approval by the Mulholland Scenic Parkway Design Review Board and must comply with the requirements of the Specific Plan.
5. Drain pipes laid on the ground and visible from Mulholland Drive shall be black or earth tone brown.	Consistent. The Project would comply with this requirement. Review and approval by the Mulholland Scenic Parkway Design Review Board will provide verification of compliance.
6. Utilities. The Advisory Agency, where feasible, shall require that all utilities installed in connection with the development of new subdivisions be placed underground.	Consistent. The Proposed Project would be subject to review and approval by the Mulholland Scenic Parkway Design Review Board and must comply with the requirements of the Specific Plan and place new utility lines underground where feasible. However, certain public or private water facilities such as fire hydrants and air valves, will be above ground. These water facilities will be painted so they are visible to emergency personnel and vehicles.
7. Roofs. All roofs visible from Mulholland Drive shall be surfaced with non-glare materials and no equipment shall be placed thereon. This provision shall not apply to solar energy devices.	Consistent. Although the architectural design has not yet been determined, the Project would be subject to review and approval by the Mulholland Scenic Parkway Design Review Board and must comply with the requirements of the Specific Plan.
Section 7: MULHOLLAND DRIVE AND RIGHT OF WAY REGULATIONS	
A. Changes and/or Improvements	
No change or improvement may be made to the alignment or design of the paved portion of Mulholland Drive or the right-of-way, except for resurfacing and street and utility maintenance, without prior approval of the City Council acting after receipt of the recommendation of the Director.	Consistent. The Project would construct a 36-foot wide private driveway (54-foot right-of-way) within the Mulholland Drive right-of-way to provide access to four homes. However, the driveway is not located in the paved portion of Mulholland Drive.
B. Alignment and Design	
Any change or improvement to the alignment or design of the paved portion of Mulholland Drive or the right-of-way, except for resurfacing and street and utility maintenance, shall conform to the following standards:	

Regulation	Proposed Project
<p>1. Roadway Alignment. The paved portion of Mulholland Drive shall conform to its existing alignment from California State Highway Route 101 to the intersection of Topanga Canyon Boulevard, except as modified for safety reasons.</p>	<p>Consistent. The Proposed Project would make no changes to the alignment or design of the paved portion of Mulholland Drive.</p>
<p>2. Right-of-Way Width. The width of the right-of-way shall conform to its existing approximately 100-foot wide corridor east from Laurel Canyon Boulevard to the Hollywood Freeway (Route 101), and to the approximately 200-foot wide corridor west of Laurel Canyon Boulevard to the City-County boundary.</p>	<p>Consistent. The Proposed Project would make no changes to the right-of-way width of Mulholland Drive.</p>
<p>3. Travel Lanes and Shoulders. Except as provided in subdivision 4 of this Subsection, Mulholland Drive shall consist of two travel lanes, one in each direction with a maximum width of 15 feet per lane and one or more shoulders, except for existing improvements between Topanga Canyon Boulevard and Saltillo Street, Encino Hills Drive and Corda Drive, and Beverly Glen Boulevard and Benedict Canyon Drive.</p> <p>This shoulder shall be level with the roadway and shall serve as a bikeway. The shoulder shall be five feet wide, except that where a slope is required to be graded in order to provide the five foot shoulder, the shoulder may be less than five feet wide. The shoulder or shoulders shall be paved with asphalt or black concrete and shall be separated from the travel lanes by a solid lane stripe in accordance with the adopted standards of the Department of Transportation. If less than five feet is available on each side of the roadway for shoulders, only the uphill shoulder shall be paved. The shoulder or shoulders shall be marked “Bike Lane” and “no Parking” on the pavement by the Los Angeles Department of Transportation.</p>	<p>Consistent. The Proposed Project would make no changes to the travel lanes of the paved portion of Mulholland Drive or the width of the shoulder.</p> <p>The Proposed Project would comply with all DOT and Specific Plan requirements in regard to the posting of right-of way and parking signage.</p>
<p>4. Turn Lanes.</p>	
<p>a. Turn lanes shall not be permitted without the prior recommendation of the Director after receipt of the recommendation of the Board. The Director shall recommend approval of a turn lane where the Department of Transportation has determined that the turn lane is required to facilitate traffic movement and for safety reasons.</p>	<p>Consistent. No turn lanes are proposed as part of the Project.</p>
<p>b. The turn lane shall be a maximum of 12 feet wide and the travel lane parallel to the turn lane shall be a maximum of 12 feet wide.</p>	<p>Consistent. No turn lanes are proposed as part of the Project.</p>
<p>5. Speed Limit. To the extent permitted by state law, the posted speed limit for vehicles shall prohibit speeds in excess of 25 miles per hour.</p>	<p>Consistent. The Project would make no changes to the speed limit of Mulholland Drive.</p>

Regulation	Proposed Project
6. Sidewalks, Curbs and Berms. No sidewalks or curbs shall be permitted. Only berms required for drainage control and/or erosion shall be permitted.	Consistent. The Project does not propose to construct sidewalks or curbs on Mulholland Drive.
7. Median Strip. No median strip shall be constructed within the Mulholland Drive right-of-way.	Consistent. The Project would make no changes to the alignment or design, including the provision of a median strip, of the paved portion of Mulholland Drive.
8. Signs. The Department of Transportation shall post signs in the right-of-way indicating the location of the bikelane, core trail crossings, and the major vista points.	Consistent. The Project would comply with all DOT and Specific Plan requirements in regard to the posting of right-of-way signage.
9. Plant Material. Existing fire resistant, native-type plants and trees shall be preserved and maintained to enhance the natural scenic character of the parkway. No oak trees shall be removed, cut down, or moved without the prior recommendation of the Director using the criteria set forth in Section 5 B 4 of this Specific Plan.	Consistent. A Landscape Plan for the Proposed Project in compliance with Specific Plan requirements would be submitted to the Mulholland Scenic Parkway Design Review Board for review and approval. The Project would remove 15 <i>Quercus agrifolia</i> (coast live oak) trees, four of which are dead and eight of which are hazardous. The Project Applicant would seek an Oak Tree Removal Permit as part of the discretionary and ministerial actions requested from the City (see Section V.B, Aesthetics for further information).
10. Existing Slopes. Existing slopes adjoining the roadway that show no signs of instability shall not be graded.	Consistent. The slopes of the knoll in the southeast portion of the Project Site adjoining the roadway would not be graded. Grading plans for the Project would be subject to the review and approval of the City of Los Angeles Department Building and Safety.
11. Rock Formations and Outcroppings. All natural rock formations and/or outcroppings, known or discovered during grading, should be preserved on-site and incorporated into the street design.	Consistent. There are no natural rock formations and/or outcroppings, as defined by the Specific Plan, located on the Project Site.
7.C. Access to Mulholland Drive	
1. Driveway Access. No driveway may intersect Mulholland Drive without the prior recommendation of the Director after receipt of the recommendation of the Board.	Consistent. Required approvals for any driveway intersecting Mulholland Drive would be obtained from the Director and Board.
7.D. Lighting	
1. Sodium and mercury vapor lamps shall be prohibited.	Consistent. Any lighting installed would be consistent with City requirements, including the requirements of the Specific Plan.
2. Lighting standards within the right-of-way shall use cut-off type fixtures which focus the light directly onto the street and shoulders.	Consistent. If required, lighting standards for the Project would comply with the requirements of the Specific Plan.
3. Lighting standards shall be located only in the immediate vicinity of major vista points and major intersections, except as provided in subdivision 5 of this Subsection.	Consistent. If required, the location of lighting standards for the Project would comply with the requirements of the Specific Plan.
4. The lamp shall cast a white light, similar to metal halide or incandescent lighting.	Consistent. If required, lighting standards, including lamping, for the Project would comply with the requirements of the Specific Plan.

Regulation	Proposed Project
<p>5. Where the Board of Public Works determines that a lighting standard is needed to improve parkway safety, the location and design of said lighting standard shall have the prior recommendation of the Director after receipt of the recommendation of the Board. The Director may recommend approval of the location and design of a lighting standard after making the following findings:</p>	<p>Consistent. If required, parkway safety lighting standards for the Project would comply with the requirements of the Specific Plan and the recommendations and subsequent findings of the Board of Public Works.</p>
<p>a. The lighting standard does not obstruct a scenic feature or resource.</p>	<p>Consistent. If required, parkway safety lighting standards for the Project would comply with the requirements of the Specific Plan and the recommendations and subsequent findings of the Board of Public Works.</p>
<p>b. The lighting standard complements the views from Mulholland Drive.</p>	<p>Consistent. If required, lighting standards for the Project would be subject to review and approval by the Mulholland Scenic Parkway Design Review Board and must comply with the requirements of the Specific Plan.</p>
<p>c. The lighting fixture proposed to be used reduces the visual intrusion of lighting into the right-of-way.</p>	<p>Consistent. If required, lighting fixtures for the Project would be subject to review and approval by the Mulholland Scenic Parkway Design Review Board and must comply with the requirements of the Specific Plan.</p>
<p>6. Existing lighting standards located in the right-of-way between Corda Drive and Encino Hills Drive, between Beverly Glen Boulevard and Benedict Canyon Drive, between Skyline Drive and Laurel Pass Avenue, between Laurel Canyon Boulevard and Dona Pegita Drive, and at Woodcliff Road should be redesigned by the Department of Public Works to reduce the glare, and cut-off fixtures should be installed to focus the light directly onto Mulholland Drive and the shoulders.</p>	<p>Consistent. The Project Site is not within any of these right-of-way areas.</p>
<p>7.E. Features</p>	
<p>1. All guard rails shall be constructed according to Bureau of Engineering standards and shall have a wood facing treated and finished to achieve a rustic and/or natural appearance.</p>	<p>Consistent. No guard rails are proposed. If required, guard rails would comply with the requirements of the Specific Plan.</p>
<p>2. All historic survey monuments set during the original survey for Mulholland Drive shall be preserved at their original location.</p>	<p>Consistent. No historic survey monuments are known to exist on the Project Site. However, the Project would comply with the requirements of the Specific Plan and the recommendations and subsequent findings of the Board of Public Works.</p>
<p>SECTION 8: CORE TRAIL</p>	
<p>A. The core trail design and location shall be approved by the City Council acting after receipt of the recommendation of the City Planning Commission. After receipt of the recommendation of the Board, the City Planning Commission may recommend approval of the construction of the core trail upon making specified findings.</p>	<p>Consistent. No trails are planned for the Proposed Project. The Specific Plan maps show the proposed Core Trail as being located on the south side of Mulholland Drive at the Project location, not on the north (Project) side; therefore, the Project would have no effect on the Core Trail.</p>
<p>SECTION 9. MAJOR VISTA POINTS</p>	

Regulation	Proposed Project						
<p>A. Location. Fourteen major vista points are designated on maps 1B through 6B.</p> <p>B. Development. No new vista point...shall be constructed without the prior approval of the City Council acting after receipt of the recommendation of the City Planning Commission.</p>	<p>Consistent. No major vista points are planned for the Proposed Project.</p>						
<p>SECTION 10: LANDSCAPING</p>							
<p>10.A. Standards. Any public or private landscaping installed on or after the effective date of this Specific Plan shall conform to the following standards:</p>							
<p>1. Graded Slopes. Graded slopes shall be landform graded in accordance with the provisions of the Landform Grading Manual, unless the Department of Building and Safety has determined that landform grading will conflict with the provisions of Divisions 29 and 70 of Article 1 of Chapter IX of the Code. Slopes which cannot be landform graded shall be landform planted in accordance with the provisions of the Landform Grading Manual. Landscaping shall be installed within six (6) months of the completion of any grading.</p>	<p>Consistent. Steepness of topography has been taken into consideration during site planning: 65.6% of the Project Site has slope gradients of 10% or less; 6.9% of the site has slope gradients between 10 and 15%; and 27.5% of the site has slope gradients over 15%. Site development has been located on the gentler slopes to the extent feasible. Manufactured slopes would have a maximum horizontal to vertical ratio of 2 to 1. The Project would utilize retaining walls in lieu of manufactured slopes in order to preserve as many oak trees on the site as possible. A Landscape Plan for the Project in compliance with Specific Plan requirements would be submitted to the Mulholland Scenic Parkway Design Review Board for review and approval.</p>						
<p>2. Location. Plant material in the inner corridor shall not obstruct the view from Mulholland Drive and the right-of-way.</p>	<p>Consistent. A Landscape Plan for the Project in compliance with Specific Plan requirements would be submitted to the Mulholland Scenic Parkway Design Review Board for review and approval.</p>						
<p>3. Type. Landscaping shall predominantly consist of native-type fire resistant plant materials.</p>	<p>Consistent. A Landscape Plan for the Project in compliance with Specific Plan requirements would be submitted to the Mulholland Scenic Parkway Design Review Board for review and approval.</p>						
<p>4. Oak Trees. Oak trees shall not be removed except as set forth in Sections 5 B 4 or 7 B 9 of this Specific Plan.</p>	<p>Consistent. The location of the existing trees on site was taken into consideration during site planning, with the majority of the existing trees being preserved in place. However, the Project would remove 15 out of 155 coast live oak trees. The Project Applicant would seek a Protected Tree Removal Permit as part of the discretionary and ministerial actions requested from the City.</p>						
<p>5. Replacement Trees. Native trees, including oak trees, which are removed shall be replaced with the same type of tree according to the following replacement schedule:</p> <table border="1" data-bbox="159 1619 769 1833"> <thead> <tr> <th>TYPE OF TREE</th><th>REPLACEMENT SIZE AND QUANTITY</th></tr> </thead> <tbody> <tr> <td>Quercus agrifolia, Q. lobata, Q. Virginiana</td><td>36-inch box (2 for 1 replacement)</td></tr> <tr> <td>All other.</td><td>15 gallon (2 for 1 replacement)</td></tr> </tbody> </table>	TYPE OF TREE	REPLACEMENT SIZE AND QUANTITY	Quercus agrifolia, Q. lobata, Q. Virginiana	36-inch box (2 for 1 replacement)	All other.	15 gallon (2 for 1 replacement)	<p>Consistent. The Project would remove a total of 28 trees, including 15 <i>Quercus agrifolia</i> and 3 other native trees (Mexican elderberry), which will require the following replacement trees: 30 36" box <i>Q. agrifolia</i> replacement trees and 6 15-gallon trees to replace the 3 other native trees that would be removed. A Landscape Plan for the Project in compliance with Specific Plan requirements would be submitted to the Mulholland Scenic Parkway Design Review Board for review and approval.</p>
TYPE OF TREE	REPLACEMENT SIZE AND QUANTITY						
Quercus agrifolia, Q. lobata, Q. Virginiana	36-inch box (2 for 1 replacement)						
All other.	15 gallon (2 for 1 replacement)						

Regulation	Proposed Project
6. Maintenance. An automatic irrigation system shall be installed where necessary to sustain plants and trees and a fire resistant corridor.	Consistent. A Landscape Plan, including irrigation plans, for the Project in compliance with Specific Plan requirements would be submitted to the Mulholland Scenic Parkway Design Review Board for review and approval.
10. B. Prohibited Plant Material	
The following plant material shall not be planted in the scenic corridor parkway on or after the effective date of this Specific Plan. (Refer to Specific Plan text, page 22 for list of prohibited plant material).	Consistent. A Landscape Plan for the Project in compliance with Specific Plan requirements would be submitted to the Mulholland Scenic Parkway Design Review Board for review and approval.
10. C. Landscape Plan	
1. A landscape plan shall be submitted to the Board for review and recommendation.	Consistent. A Landscape Plan for the Project in compliance with Specific Plan requirements would be submitted to the Mulholland Scenic Parkway Design Review Board for review and approval.
2. Landscape plans shall include the approximate size at maturity and location of all proposed plant materials, the scientific and common names of such plant materials, the proposed irrigation plan and the estimated planting schedule. The plan shall identify the length of time in which plant maturity will be attained.	Consistent. A Landscape Plan, including irrigation plans, for the Project in compliance with Specific Plan requirements would be submitted to the Mulholland Scenic Parkway Design Review Board for review and approval.

Specific Plan Viewshed Analysis

The Mulholland Scenic Parkway Specific Plan Design and Preservation Guidelines require that a viewshed analysis be prepared for any project within the Inner Corridor, in order to determine the extent to which building heights negatively impact views. This analysis is presented below in Table V.G-5.

Methodology

The following analysis, depicted in Table V.G-5, is an assessment of the extent and degree of viewshed encroachments that would potentially result from development of the Proposed Project. The Mulholland Scenic Parkway Specific Plan and Design and Preservation Guidelines provide a methodology for use in conducting the required viewshed analysis. Because the Proposed Project would subdivide the existing two parcels comprising the Project Site into 19 lots, an individual viewshed analysis was performed for each of the 19 proposed single-family home lots. Guideline 19 of the Design and Preservation Guidelines requires classification of a lot as upslope or downslope based on the comparison of the highest elevation of the building pad, to the lowest elevation of the Mulholland Drive right-of-way (the "ROW") contiguous to the property. The following methodological assumptions and procedures were determined to be appropriate for the Project Site and have been used in preparing the viewshed analysis:

- Determine upslope or downslope - use the single point of lowest elevation along the ROW in closest proximity to the elevation of the proposed building pad on each lot for comparison in determining upslope or downslope.

- If upslope – consider the allowable building height and encroachment into the 15 foot height limitation within 100 feet of Mulholland and the 30 foot height limitation between 100 and 500 feet of Mulholland.
- If downslope – consider the encroachment into the required viewshed, as described in Guideline 19.
- Calculate the encroachment – when calculating the height and/or viewshed encroachment, use multiple vectors perpendicular to the ROW. Use the fewest amount of vectors needed to intersect all pads.
- Note intervening physical features⁷ – Table V.G-5 (explained below) lists the *Calculated Theoretical Impact*, which notes the extent of the encroachment without consideration of physical realities, as well as the *Practical Impact* which documents the overall impact taking into consideration intervening vegetation, topography and structures.

To determine whether the proposed lots are upslope or downslope, the extent to which each encroaches into the height limitation and into the viewshed, and the extent to which intervening vegetation, topography and structures mediate the practical impact, a series of cross-sections of the Project Site were prepared. The cross-section locations are shown on Figure V.G-1. Based on these cross-sections, section profiles were then developed (see Figures V.G-2 and V.G-3). The scales on either end of each profile indicate the elevation of the Mulholland Drive centerline at the cross-section; the scale can then be used to determine: (1) the elevation of the Mulholland Drive ROW adjacent to the Project Site; (2) the existing ground line; (3) the finished ground line at the completion of construction; (4) the extent to which the relevant units encroach into the height limitation and into the viewshed; and (5) the line-of-sight from the centerline of Mulholland Drive. A total of 11 cross-sections (A-A through K-K) are analyzed and they extend from the centerline of Mulholland Drive to the centerline of San Feliciano Drive.

Since the purpose of the Specific Plan and Design and Preservation Guidelines is to preserve and enhance the unique character and scenic features of Mulholland, a "worst case scenario" approach is used for the analysis and is documented in Table V.G-5. Each proposed residence is examined under both upslope and downslope conditions. The determination of upslope versus downslope is documented in the *Upslope vs. Downslope* column. Following that column, the columns for *If Downslope – Viewshed Encroachment* and *If Upslope – Height Violation* are listed for every pad. Thus, the analysis considers the potential impacts of either interpretation of the Guidelines.

⁷ While it is understood that determination of a viewshed encroachment or height violation is based on the calculated impact as outlined in the Mulholland Scenic Parkway Specific Plan and Design and Preservation Guidelines, the Practical Impact section was included to provide a more complete picture of the impacts the project will have on the Mulholland Scenic Parkway.

Conclusions

As shown in Table V.G-5 and graphically presented in Figure V.G-4, the potential visible impact from Mulholland Drive is eliminated by intervening topography, vegetation, and/or structures for the majority of residences. Of the 19 new homes in the Proposed Project, 15 homes (or approximately 79 percent) would be entirely screened from view at all points along the Mulholland Drive right-of-way contiguous with the property. The homes that would not be visible are those that would be constructed on Lots 5-19. A total of three homes (or approximately 16 percent of the total number of lots in the Project) may be partially visible from one or more points along Mulholland Drive, but are substantially screened by intervening vegetation, topography, and/or structures as indicated. The homes that would be partially visible are those that would be constructed on Lots 1, 2, and 4. One home (to be constructed on Lot 3) would be wholly visible from Mulholland Drive, although it would be blocked from view at some points along Mulholland Drive. Based upon the following analysis, the Project can be found to be in substantial conformance with the Specific Plan and Design and Preservation Guidelines.

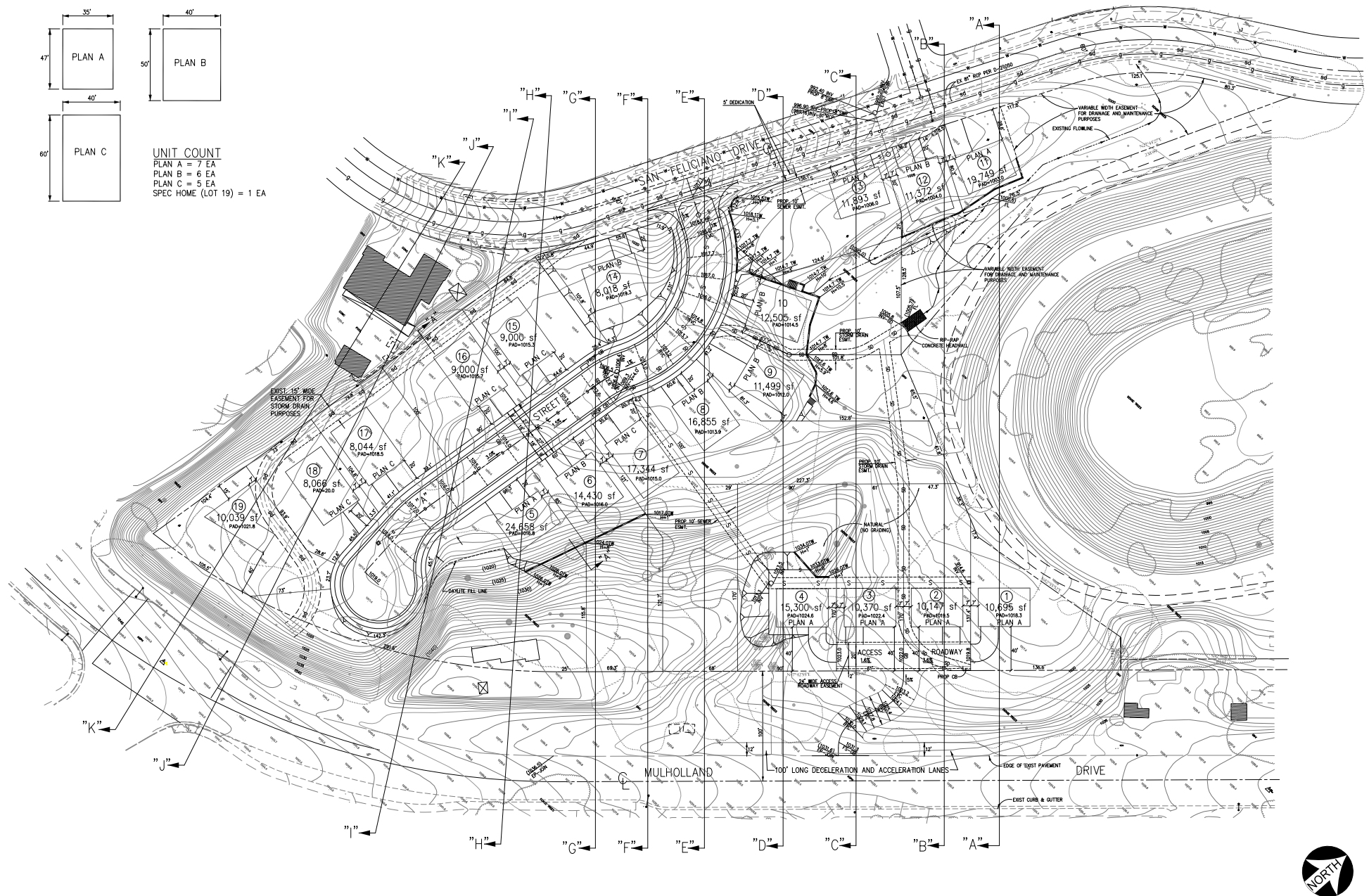
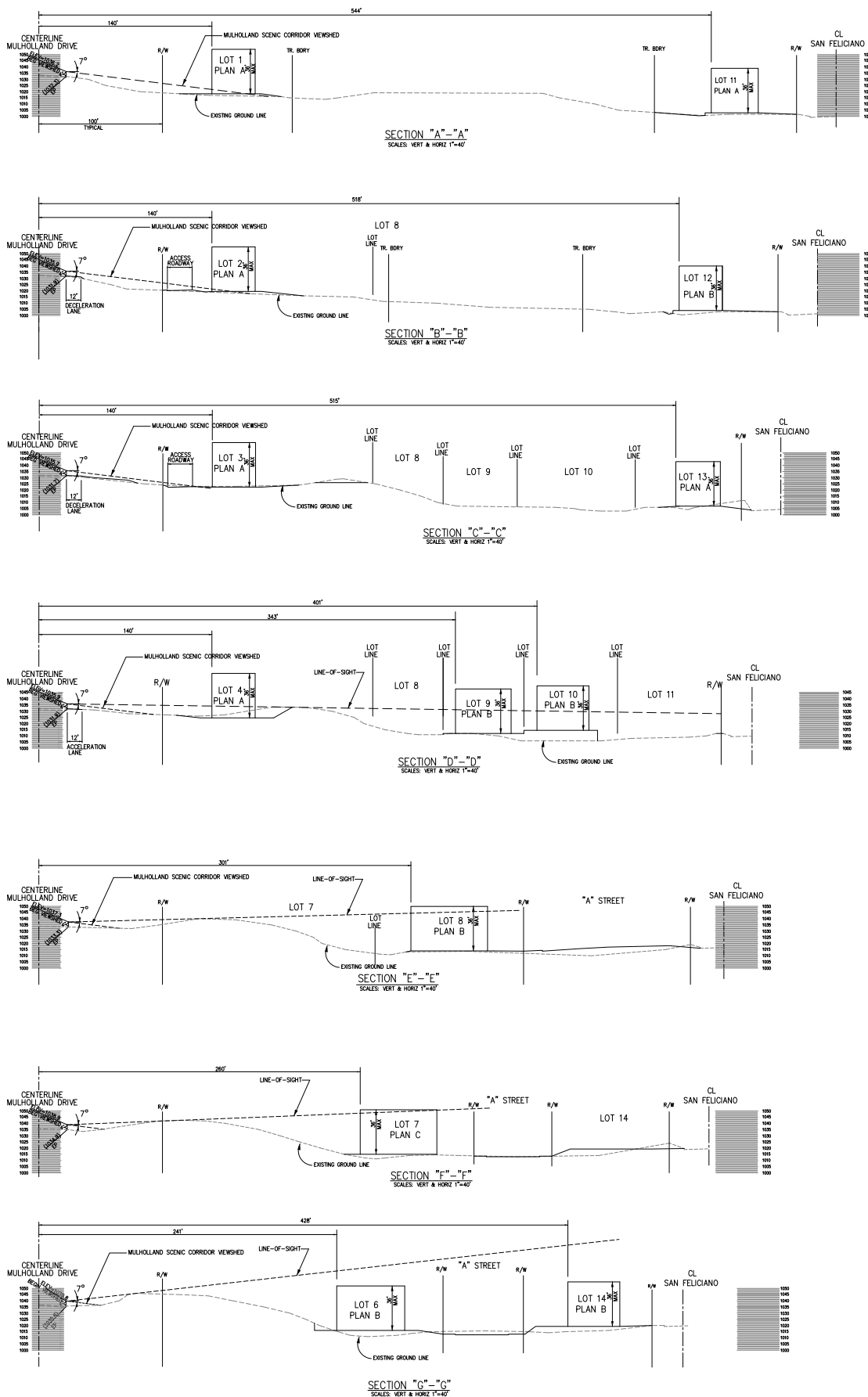
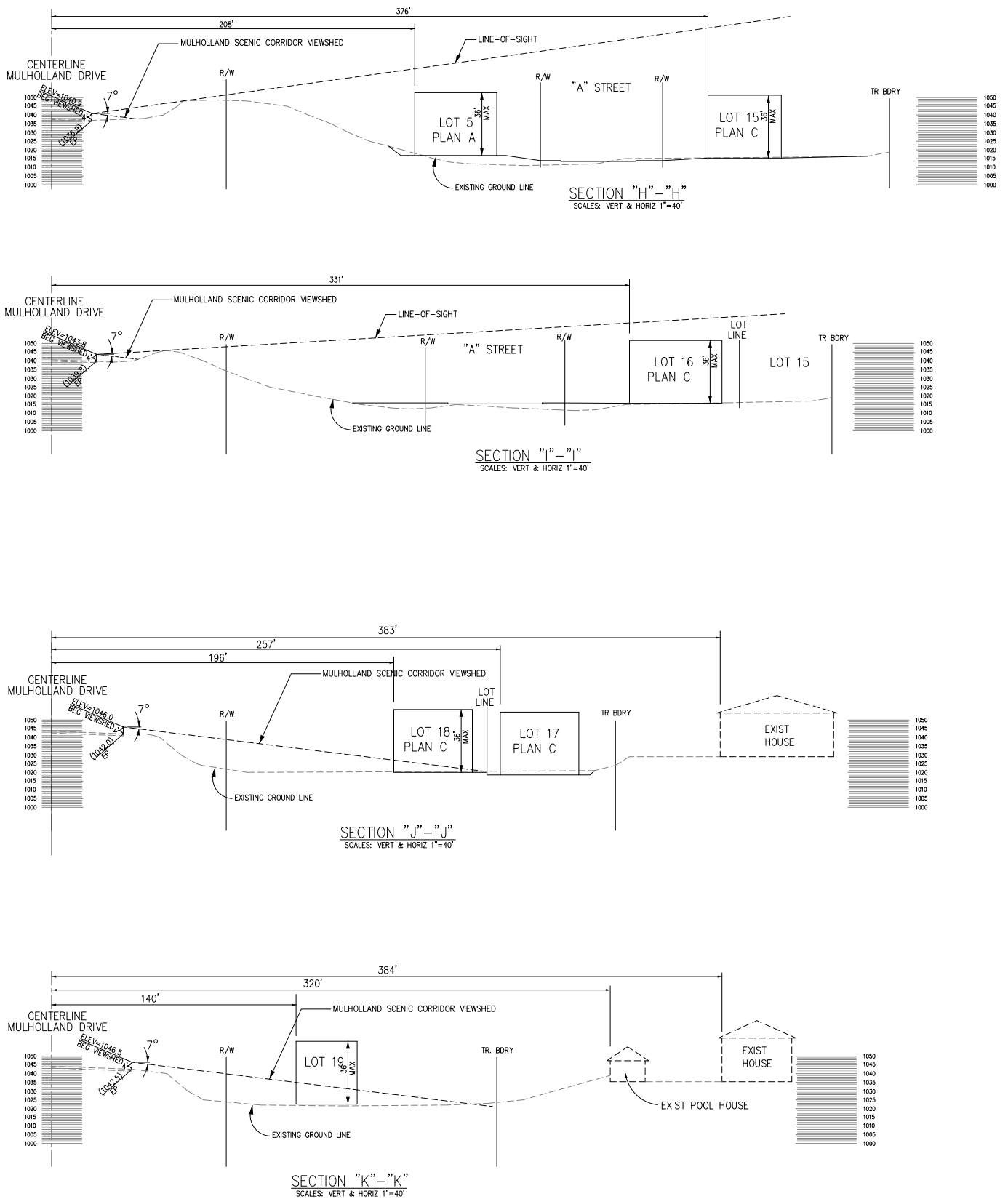


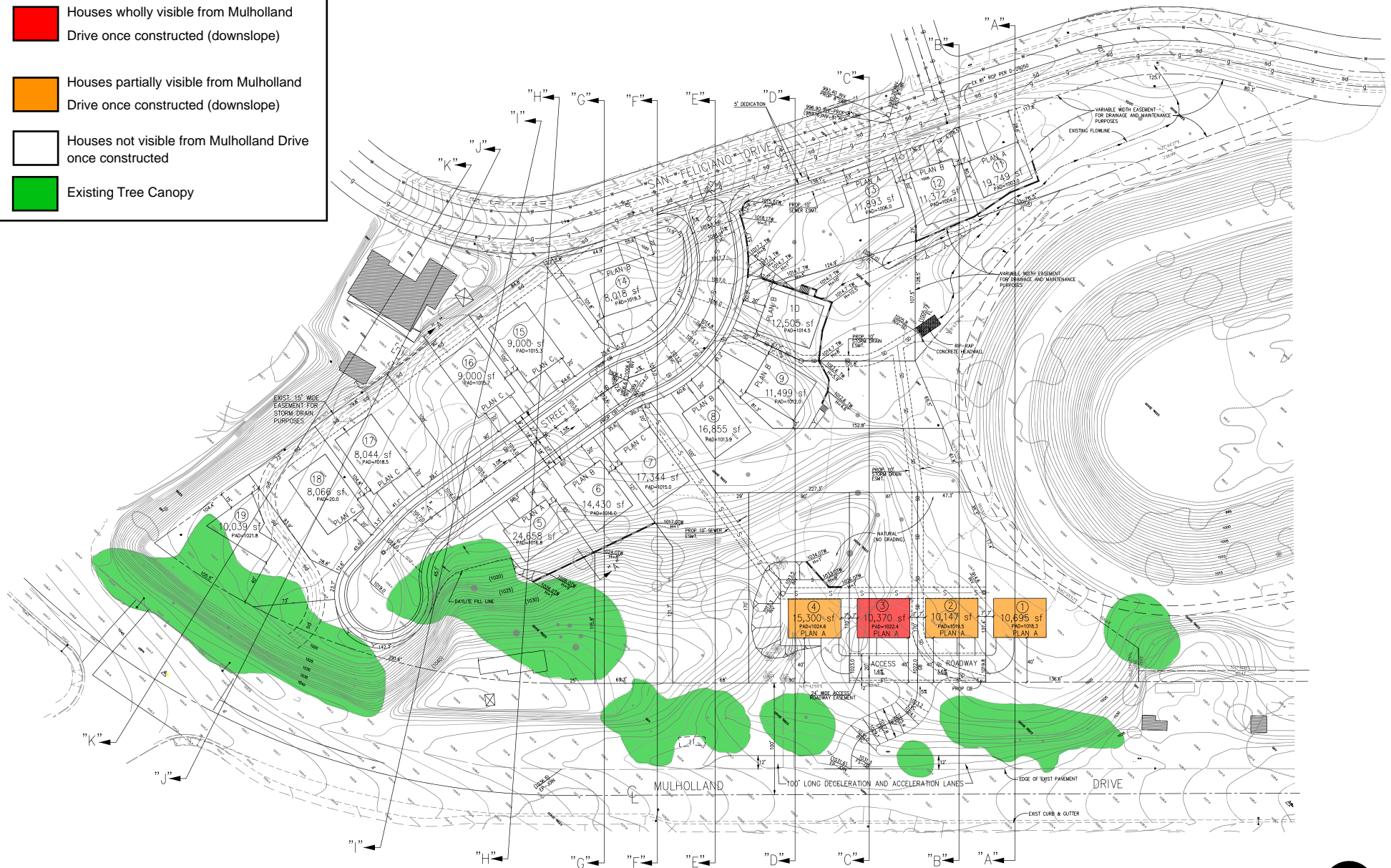
Figure V.G-1
Viewshed Cross-Sections





Legend

- Houses wholly visible from Mulholland Drive once constructed (downslope)
- Houses partially visible from Mulholland Drive once constructed (downslope)
- Houses not visible from Mulholland Drive once constructed
- Existing Tree Canopy



**Table V.G-5
Viewshed Analysis**

LOT	SECTI ON	DISTANCE FROM CENTERLINE OF MULHOLLAND	UPSLOPE vs. DOWNSLOPE (Lowest ROW to Highest Pad Elevation)	IF DOWNSLOPE – VIEWSHED ENCROACHMENT		IF UPSLOPE – HEIGHT VIOLATION ¹		INTERVENING PHYSICAL FEATURES ² (Between Edge of Pavement and Pad)	OVERALL EFFECTIVE VISUAL IMPACT FROM MULHOLLAND EDGE OF PAVEMENT
				Into Scenic Corridor	Into Line of Sight	Within 100’	100’- 500’		
		Calculated Theoretical Impact						Practical Impact	
1	A-A	140’	Downslope	32.5’	N/A	N/A	N/A	Dense Trees	Impact reduced by intervening vegetation
2	B-B	140’	Downslope	34.1’	N/A	N/A	N/A	Trees	Impact reduced by intervening vegetation
3	C-C	140’	Downslope	36’	N/A	N/A	N/A	None	Residence visible
4	D-D	140’	Downslope	36’	26.4’	N/A	N/A	Trees	Impact reduced by intervening vegetation
5	H-H	208’	Downslope	36’	Clear	N/A	N/A	Dense Trees	Impact eliminated by intervening vegetation
6	G-G	241’	Downslope	36’	Clear	N/A	N/A	Dense Trees; Topography < 5 ft.	Impact eliminated by intervening vegetation and topography
7	F-F	260’	Downslope	36’	2.8’	N/A	N/A	Dense Trees; Topography < 5 ft.	Impact eliminated by intervening vegetation and topography
8*	E-E	301’	Downslope	36’	5.5’	N/A	N/A	Dense Trees; Topography < 5 ft.	Impact eliminated by intervening vegetation and topography

9*	D-D	343'	Downslope	Obscured	Obscured	N/A	N/A	Dense Trees; Topography < 5 ft.; Lot 4	Impact eliminated by intervening vegetation, topography and structures
10*	D-D	401'	Downslope	Obscured	Obscured	N/A	N/A	Dense Trees; Topography 5-10 ft.; Lots 4 & 9	Impact eliminated by intervening vegetation, topography and structures
11*	A-A	544'	Downslope	Obscured	Obscured	N/A	N/A	Dense Trees; Lot 1	Impact eliminated by intervening vegetation and structures
12*	B-B	518'	Downslope	Obscured	Obscured	N/A	N/A	Dense Trees; Lot 2	Impact eliminated by intervening vegetation and structures
13*	C-C	515'	Downslope	Obscured	Obscured	N/A	N/A	Topography 5-10 ft.; Lot 3	Impact eliminated by topography and structures
14*	G-G	428'	Downslope	Obscured	Obscured	N/A	N/A	Dense Trees; Topography 5-10 ft.; Lots 6 & 7	Impact eliminated by intervening vegetation, topography and structures
15*	H-H	376'	Downslope	Obscured	Obscured	N/A	N/A	Dense Trees; Topography 5-10 ft.; Lots 5 & 6	Impact eliminated by intervening vegetation, topography and structures
16*	I-I	331'	Downslope	36'	Clear	N/A	N/A	Dense Trees; Topography < 5 ft.	Impact eliminated by intervening vegetation and topography
17*	J-J	257'	Downslope	36'	N/A	N/A	N/A	Dense Trees; Lot 18	Impact eliminated by intervening vegetation, topography and structures
18*	J-J	196'	Downslope	29'	N/A	N/A	N/A	Dense Trees; Topography < 5 ft.; Lot 19	Impact eliminated by intervening vegetation, topography and structures

19	K-K	140'	Downslope	23.5'	N/A	N/A	N/A	Dense Trees	Impact eliminated by intervening vegetation
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¹ Based on a building height of 36 feet. All homes within 100 feet of the Mulholland ROW constitute a height encroachment of 21 feet, while all homes within between 100 and 500 feet of the Mulholland ROW constitute a height encroachment of 6 feet.

² The measurements related to topography in this column refer to the height of the ground above sight line between the edge of the pavement and the proposed home pad.

* Denotes lots fronting on San Feliciano Drive and which have no lot line contiguous with the Mulholland ROW.

Specific Plan Oak Tree Regulations

The Mulholland Scenic Parkway Specific Plan also prohibits the removal of any oak trees without the prior written approval of the Planning Director after making the following findings:

- a. The removal, cutting down or moving of an oak trees will not result in an undesirable, irreversible soil erosion through diversion or increased flow of surface waters.*

According to the preliminary hydrology investigation for the Project Site, the existing unimproved Project Site drains into the Girard Reservoir property and from there into an existing storm drain in San Feliciano Drive. Currently, during a 50-year storm event, the Project Site would produce a peak flow of 25.7 cubic feet per second (cfs). After Project development, the developed site would produce a peak runoff of 30.9 cfs from an equivalent storm. However, while site runoff would increase by 5.2 cfs, the increased runoff would be conveyed to the storm drain in San Feliciano Drive via non-erosive drainage improvements and paved streets. Therefore, the Proposed Project would result in less potential for soil erosion from uncontrolled runoff. Furthermore, the oak trees would only be removed to accommodate development. Site preparation in the vicinity of the removed oak trees would include soil stabilization in the form of building construction, pavement or landscaping. Consequently, the removal of the oak trees would not be expected to result in undesirable, irreversible soil erosion through diversion or increased flow of surface waters.

- b. The oak tree is not located with reference to other trees or monuments in such a way as to acquire a distinctive significance at said location*

A review of Figure V.B-6 in Section V.B (Aesthetics) demonstrates that all of the 15 oak trees and most of the other trees proposed for removal are located within the interior of the Project Site and are not readily visible from off-site locations. The oak trees are primarily situated behind groves of existing trees and/or behind intervening knolls. Additionally, 12 of the 15 oak trees to be removed have an aesthetic rating of “D” (poor), or dead (E and F), while the remainder are rated as “B” or “C” (fair). While the oak woodland on the Project Site has high aesthetic values, the individual oak trees slated for removal have not acquired a distinctive significance with reference to the other trees or monuments on the Project Site.

Specific Plan Consistency Summary

With approval of the requested discretionary actions from the City of Los Angeles, the Proposed Project could be found not to conflict with the Mulholland Scenic Parkway Specific Plan. Those discretionary actions include:

- Vesting Tentative Tract Map No. 67505 – Pursuant to Los Angeles Municipal Code (LAMC) 17.00, the Applicant is requesting the approval of Vesting Tentative Tract Map (VTTM) No. 67505 to authorize a 19-unit detached single-family residential development on 19 parcels.
- Protected Tree Removal/Relocation Permit - Pursuant to LAMC 17.05R, the Applicant is requesting the approval of VTTM No. 67505 to authorize a 19-unit detached single-family

residential development on 19 parcels and Advisory Agency approval to remove a total of 28 trees, consisting of 15 protected coast live oaks, 3 Mexican elderberry, and 10 non-native trees.

- Advisory Agency Approval – Pursuant to LAMC 17.00, the Applicant is requesting the approval of a new 36-foot wide private street and cul-de-sac for access to 11 lots and the designation of San Feliciano Drive as the front yard for Lots 11-14 and the private street as the front yard for Lots 5-10 and 15-19.
- Zoning Administrator Determination (ZAD) – Pursuant to LAMC Sections 12.24 X7 and X26, the Applicant is requesting a ZAD regarding the number and height of retaining walls as follows:

For retaining walls in the front yard exceeding 3.5 feet in height

Pursuant to LAMC Section 12.24 X7, the Applicant is requesting a ZAD to permit a retaining wall exceeding 3.5 feet in height within the required front yard setback of Lot 13. LAMC Section 12.22 C 20(f) allows fences and walls not more than three and one-half feet in height within the required front yard in an R zone. A retaining wall 70 feet in length and one to eight feet in height is located on Lot 13; a portion of the wall is located in the front yard setback.

For more than 1 retaining wall per lot

Pursuant to LAMC Section 12.24 X26, the Applicant requests a ZAD to allow more than one retaining wall per lot. The Project proposes six retaining walls with a total of 510 linear feet. LAMC Section 12.21 C 8 requires a maximum of one retaining wall per lot with a maximum height of 12 feet or two retaining walls provided a minimum horizontal distance between walls of three feet and maximum wall heights of 10 feet. The Applicant is requesting this ZAD in order to begin grading and construction of the retaining walls prior to recordation of the final map. After recordation of the final map and subdivision into 19 lots, the Project will be consistent with the zoning code provisions, and no lot will have more than one retaining wall.

- Any other necessary discretionary or ministerial permits or approvals as may be required for the construction of the Proposed Project. Such approvals may include, but are not limited to: design review, Specific Plan project permit compliance, landscaping, permit approvals for grading, approvals for foundations, retaining walls, and structural improvements; installation and hookup approvals for public utilities and related permits.

Los Angeles Municipal Code (Zoning Code)

As discussed previously, the Project Site is located in the R1-1 zone. This is a single-family residential designation with a minimum lot size of 5,000 square feet. The “-1” refers to the Height District, which permits a height range from 33 feet to 45 feet. The Project would develop 19 single-family homes on the

site on individual lots ranging in size from 8,018 to 24,658 square feet. The proposed homes would be no taller than 36 feet. Thus, the Project would be consistent with the site's zoning.

Los Angeles Municipal Code (Hillside Grading Ordinance)

The Proposed Project will be required to comply with the requirements of the Hillside Grading Ordinance. Generally, the Project Applicant will be required to submit a Geotechnical Report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety prior to the issuance of building or grading permits. Also, the project must be designed and built in accordance with City of Los Angeles Building Code construction requirements for habitable structures. Furthermore, City required erosion controls would be imposed during grading and via building permit regulations. Specifically, grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills.

Los Angeles Municipal Code (Mountain Fire District and Very High Fire Hazard Severity Zone)

Because the Project Site is approximately 2.2 miles from the nearest fire station, the homes would be required to install sprinkler systems. In addition, the Proposed Project would be designed according to City of Los Angeles Fire Code requirements and would undergo Los Angeles Fire Department review prior to the recordation of a final map or prior to the approval of a building permit, as is required by the LAMC (refer to Appendix A, Initial Study, Public Services, Fire Protection). With compliance with the Fire Department's requirements, the Project would be consistent with the pertinent requirements of the Mountain Fire District and Very High Fire Hazard Severity Zone.

Los Angeles Municipal Code (Protected Tree Ordinance)

A Protected Tree Removal permit would be required for the removal and replacement of up to 15 coast live oak trees in accordance with City of Los Angeles Ordinance 177,404. In accordance with those regulations, prior to the issuance of a grading permit, a tree report and landscape plan prepared by a City-designated tree expert would be submitted to the City. In addition, because the proposed Project Site is within the Mulholland Scenic Parkway Specific Plan area, a minimum of two oak trees (minimum of 36-inch box size) are to be planted for each one that is removed, any native tree removed must be replaced at a two for one ratio (minimum of 15-gallon size), and any non-native tree removed must be replaced at a one for one ratio (minimum of 15-gallon size). Further, a bond would be posted to guarantee the survival of trees which would be maintained, replaced or relocated to assure the existence of continuously living trees for a minimum of three years from the date the bond was posted or the trees were replaced or relocated. This issue is discussed in greater detail in Sections V.B (Aesthetics) and V.D. (Biological Resources) of this Draft EIR.

Habitat Conservation Plans

There are no habitat conservation plans or community conservation plans that are applicable to the Project Site. Therefore, the Proposed Project would not conflict with any habitat conservation plan or community conservation plan and there would be no impact.

Land Use Compatibility

Appendix G to the State CEQA Guidelines does not include any significance thresholds relating to a project's compatibility with surrounding land uses. However, as enumerated under the "Thresholds of Significance" heading, the *LA CEQA Thresholds Guide* addresses land use compatibility. Furthermore, it is useful to address the functional compatibility of the Project with its surrounding land uses. Functional compatibility is defined as the capacity for adjacent, yet dissimilar, land uses to maintain and provide services, amenities, and/or environmental quality associated with such uses. Potentially significant functional land use compatibility impacts may be generated when a project hinders the functional patterns of use and relationships associated with existing land uses.⁸

The physical compatibility of the Project with its surrounding environs is based on an analysis of proposed uses and improvements and their potential on- and off-site impacts on traffic, noise, air quality, and aesthetics. These impacts, together with proposed mitigation measures, where applicable, are discussed in their respective sections of this Draft EIR. This section, therefore, focuses on the compatibility of the Project from a functional perspective.

As discussed under "Environmental Setting" at the beginning of this section, a mix of single-family residential, educational, commercial/retail, and public infrastructure (reservoir) uses characterizes the surrounding properties. The immediate surrounding areas are zoned for residential uses. As discussed in Section V.B, Aesthetics, although the Project would alter the visual character of the Project area by removing the existing vacant home and redeveloping the Project Site with 19 single-family homes, this alteration in the visual character would not equate to a substantial degradation. No significant impacts related to visual character would occur as a result of the Project.

As discussed in Section V.C, Air Quality, sensitive receptors in the form of residences and a private high school are located adjacent to the Project Site. As shown on Table V.C-8 in Section V.C, Air Quality, implementation of Mitigation Measures C-1 through C-5 would reduce the Project's local construction emissions to below SCAQMD's significance thresholds, and would ensure that Project air quality impacts related to sensitive receptors would be less than significant.

As discussed in Section V.H, Noise, the nearest sensitive receptors to the Project Site are the existing residences bordering the site boundary along San Feliciano Drive and Mulholland Drive. As discussed in

⁸ *Patterns of use relate to the interaction and movement of people, goods, and/or information.*

Section V.H, implementation of Mitigation Measures H-1 through H-14 would ensure that construction noise levels would not exceed the 75 dBA threshold and would also reduce the noise levels associated with construction and operation of the Project to the maximum extent that is technically feasible, and temporary and intermittent construction noise levels at the location of sensitive receptors near the Project Site would be less than significant.

As discussed in Section V.I, Transportation/Traffic, the Project would not result in significant impacts at any of the study intersections.

As discussed above, the Project would be substantially compatible with the surrounding land uses. Therefore, Project impacts related to land use incompatibility would be less than significant.

CUMULATIVE IMPACTS

Generally, a "cumulative impact" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects (CEQA Guidelines, §15355). An environmental impact report must discuss the cumulative impacts of a project when the project's incremental impacts are cumulatively considerable. An impact is considered "cumulatively considerable" when the incremental impacts of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. When the lead agency is examining a project with an incremental effect that is not "cumulatively considerable," the lead agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

An adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence.

Cumulative land use impacts could occur if any cumulative development projects would result in incompatible land uses, or result in land uses that are inconsistent with adopted land use plans when combined with the impacts of the Project. As previously stated in Section IV, Environmental Setting, one cumulative development project is currently proposed within a 1.5-mile radius of the Project Site. This project, the Clarendon Street Apartments development near the intersection of Topanga Canyon Boulevard and the US 101 (Ventura) Freeway, is located at such a distance from the Proposed Project location (approximately 1.3 miles) that it would not combine with the Proposed Project to result in a cumulatively considerable land use impact.

MITIGATION MEASURES

The Proposed Project would not physically divide an established community or conflict with any applicable land use plan, policy, regulation, habitat conservation plan or natural community conservation plan. The Proposed Project's land use impacts would be less than significant. Therefore, with the approval of the requested entitlements, no mitigation measures are required or recommended.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Proposed Project's land use impacts would be less than significant.

V. ENVIRONMENTAL IMPACT ANALYSIS

H. NOISE

This section examines the degree to which the Proposed Project may result in significant adverse changes to the existing noise environment at the Project Site. Both short-term construction noise resulting from activities such as site grading and haul truck trips, as well as long-term noise related to the ongoing operation of the Proposed Project are discussed in this section. Appendix I contains the results of the noise modeling analysis that was performed to support the discussion in this section of the Draft EIR.

ENVIRONMENTAL SETTING

Fundamentals of Sound and Environmental Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway. Table V.G-1, Representative Environmental Noise Levels, illustrates representative noise levels in the environment.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. The L_{eq} is a measure of ambient noise, while the L_{dn} and CNEL are measures of community noise. Each is applicable to this analysis and defined as follows:

- L_{eq} , the equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- L_{dn} , the Day-Night Average Level, is a 24-hour average L_{eq} with a 10 dBA “weighting” added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the

nighttime. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.4 dBA L_{dn} .

- CNEL, the Community Noise Equivalent Level, is a 24-hour average L_{eq} with a 5 dBA “weighting” during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA “weighting” added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Table V.H-1
Representative Environmental Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock Band
Jet Fly-over at 100 feet		
	—100—	
Gas Lawnmower at 3 feet		
	—90—	
		Food Blender at 3 feet
Diesel Truck going 50 mph at 50 feet	—80—	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime		
Gas Lawnmower at 100 feet	—70—	Vacuum Cleaner at 10 feet
Commercial Area		Normal Speech at 3 feet
Heavy Traffic at 300 feet	—60—	
		Large Business Office
Quiet Urban Area during Daytime	—50—	Dishwasher in Next Room
Quiet Urban Area during Nighttime	—40—	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime		
	—30—	Library
Quiet Rural Area during Nighttime		Bedroom at Night, Concert Hall (background)
	—20—	
		Broadcast/Recording Studio
	—10—	
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing

Source: California Department of Transportation, 1998.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas

(typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

When evaluating changes in 24-hour community noise levels, a difference of 3 dBA is a barely perceptible increase to most people. A 5 dBA increase is readily noticeable, while a difference of 10 dBA would be perceived as a doubling of loudness.

Noise levels from a particular source decline as distance to the receptor increases. Other factors, such as the weather and reflecting or shielding, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer homes is generally 30 dBA or more.

Fundamentals of Environmental Groundborne Vibration

Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second and, in the U.S., is referenced as vibration decibels (VdB).

The background vibration velocity level in residential and educational areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

The general human response to different levels of groundborne vibration velocity levels is described in Table V.G-2, Human Response to Different Levels of Groundborne Vibration.

Table V.H-2
Human Response to Different Levels of Groundborne Vibration

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.
<i>Source: Federal Railroad Administration, 1998.</i>	

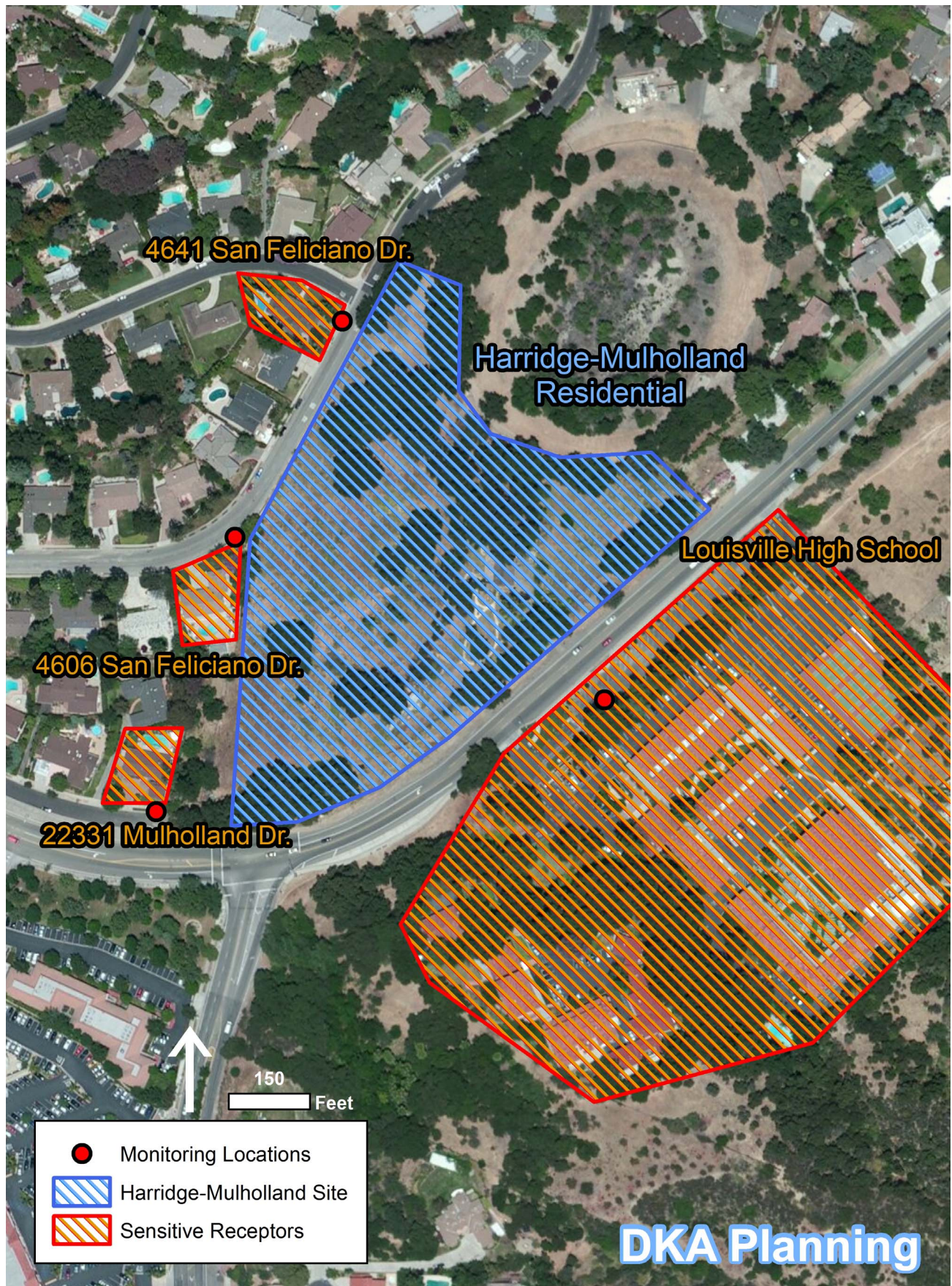
Existing Ambient Daytime Noise Levels

The area surrounding the Project Site is characterized by suburban development consisting of mostly residential land uses. Existing daytime noise levels were monitored at four offsite locations using the Quest Technologies SoundPro DL Sound Level Meter noise meter, which meets the minimum industry standard performance requirements for “Type 1” standard instruments as defined in the American National Standard Institute (ANSI) and the International Electrothnical Commission (IEC) for general environmental noise measurement instrumentation. This instrument was calibrated and operated according to the manufacturer’s written specifications. At the measurement sites, the microphone was placed at a height of five feet above the local grade.

At the noise measurement locations, listed in Table V.H-3, the sound level meter was programmed to record the average sound level (L_{eq}) over a cumulative period of 15 minutes, in accordance with Section 111.01(a) of the LAMC. Existing daytime noise levels were monitored at four off-site locations in order to identify representative noise levels in the area. The average noise levels and sources of noise monitored at each location are shown in Table V.H-3, with the locations identified in Figure V.H-1, Noise Monitoring Locations. The daytime noise levels listed in Table V.H-3 are characteristic of a typical suburban residential environment.

Table V.H-3
Existing Daytime Noise Levels at Selected Off-site Locations

Noise Measurement Location	Primary Noise Sources	Noise Level Statistics
		L_{eq}
1. Eastern edge of single-family residence at 4641 San Feliciano Drive. Approximately 70 feet northwest of Project Site boundary.	Vehicular traffic on San Feliciano Drive.	58.9
2. Northeast corner of single-family residence at 4606 San Feliciano Drive. Approximately 20 feet west of the Project Site boundary.	Vehicular traffic on San Feliciano Drive.	60.5
3. Southeast corner of single-family residence at 22331 Mulholland Drive. Approximately 55 feet west of the Project Site boundary.	Vehicular traffic on Mulholland Drive and Mulholland Highway.	67.4
4. In front of nearest classroom building to the project site within Louisville High School, which is located southwest of the Project Site across Mulholland Drive. Approximately 200 feet southeast of Project Site boundary.	Vehicular traffic on Mulholland Drive	70.6
<i>Source: DKA Planning, 2015.</i>		



Existing Roadway Noise Levels Off-site

Existing roadway noise levels were calculated for the roadway segments surrounding the Project Site that have noise-sensitive uses facing the roadways. This task was accomplished using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. Traffic volumes utilized as data inputs in the noise prediction model were obtained from the Project Traffic Study. The average daily noise levels along these roadway segments are presented in Table V.H-4.

Table V.H-4
Existing Roadway Noise Levels Off-site (Average Daily)

Roadway	Roadway Segment	Existing Noise-Sensitive Land Uses	dBA CNEL
San Feliciano Drive	Southbound between Providencia and Dumetz	Residential	60.0
Dumetz Road	Northeast corner at San Feliciano Drive	Residential	62.8
Dumetz Road	Southeast corner at San Feliciano Drive	Residential	62.4
Dumetz Road	Westbound between San Feliciano and Topanga Canyon	Residential	61.2
Dumetz Road	Eastbound between San Feliciano and Topanga Canyon	Residential	61.3
Topanga Canyon Road	Northbound between San Miguel and Providencia	Residential	69.1
Topanga Canyon Road	Southbound between San Miguel and Providencia	Residential	68.9
Topanga Canyon Road	Northbound between Dumetz and Mulholland	Residential	69.6
Topanga Canyon Road	Southbound between Dumetz and Mulholland	Residential	69.5
San Feliciano Drive	Southbound between Mulholland and Dumetz	Residential	59.6
San Feliciano Drive	Northbound between Mulholland and Dumetz	Residential	58.7
Mulholland Drive	Westbound between San Feliciano and Topanga Canyon	Residential and School	64.2
Mulholland Drive	Northeast corner at San Feliciano Drive	Residential and School	64.6
Mulholland Drive	Northwest corner of San Feliciano Drive	Residential	63.2
Mulholland Highway	Northbound between Mulholland Dr and Freedom	Residential and School	68.6
<i>Source: DKA Planning, 2015. Calculation data and results are provided in Appendix I.</i>			

Existing Groundborne Vibration Levels

Aside from seismic events, the greatest regular source of groundborne vibration at the Project Site and immediate vicinity is from roadway truck traffic on Mulholland Drive, San Feliciano Drive, and Mulholland Highway. These trucks typically generate groundborne vibration velocity levels of around 63 VdB. These levels could reach 72 VdB where trucks and buses pass over bumps in the road.¹

Regulatory Framework

Federal

The City of Los Angeles has not adopted any thresholds for groundborne vibration impacts. Therefore, this analysis uses the Federal Transit Administration's vibration impact thresholds during construction and operation for sensitive buildings. The Federal Transit Administration has developed vibration impact thresholds for noise-sensitive buildings, residences, and institutional land uses.

State

Title 24 of the California Code of Regulations codifies Sound Transmission Control requirements, which establishes uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family dwellings. Specifically, Title 24 states that interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room of new multi-family dwellings. Dwellings are to be designed so that interior noise levels will meet this standard for at least ten years from the time of building permit application.

Local

City of Los Angeles

The City of Los Angeles is the local agency responsible for adopting and implementing policies as they relate to noise levels and its affect on land uses within its jurisdiction. Both acceptable and unacceptable noise levels associated with construction activities, roadway noise levels and ambient noise levels must all be defined and quantified. The City of Los Angeles has numerous ordinances and enforcement practices that apply to intrusive noise as well as ones that guide new construction. The City's comprehensive noise ordinance (Section 111 et seq. of the LAMC) sets forth sound measurement and criteria, maximum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for determining when noise is deemed to be a disturbance to the peace, and legal remedies for violations. The standards are correlated with land use zoning classifications in order

¹ Federal Railroad Administration, 1998.

to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds the ambient noise levels within a specified zone. Table V.H-5, Community Noise Exposure (CNEL), lists the noise/land use compatibility guidelines for land uses within the City of Los Angeles.

Table V.H-5
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable^a	Conditionally Acceptable^b	Normally Unacceptable^c	Clearly Unacceptable^d
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 70
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 80
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 65
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 70
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---
^a <i>Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.</i> ^b <i>Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.</i> ^c <i>Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.</i> ^d <i>Clearly Unacceptable: New construction or development should generally not be undertaken.</i>				
Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines" 2003.				

In accordance with the Noise Element of the City of Los Angeles General Plan, a 60 dB CNEL exposure is considered to be the most desirable target for the exterior of noise-sensitive land uses, or sensitive receptors, such as homes, schools, churches, libraries, etc. It is also recognized that such a level may not always be possible in areas of substantial traffic noise intrusion. Exposures up to 70 dB CNEL for noise-sensitive uses are considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dB CNEL are normally unacceptable for sensitive receptors except in unusual circumstances.

ENVIRONMENTAL IMPACTS

Methodology

Implementation of the Proposed Project could result in the introduction of noise levels that may exceed permitted City noise levels. The primary sources of noise associated with the Project would be construction activities at the Project Site and Project-related traffic volumes associated with operation of the proposed single-family homes. Secondary sources of noise would include new stationary sources (such as heating, ventilation, and air conditioning units) used in the new homes. The net increase in Project Site noise levels generated by these activities and other sources have been quantitatively estimated and compared to the applicable noise standards and thresholds of significance.

Aside from noise levels, groundborne vibration would also be generated during the construction phase of the Project by construction equipment. Thus, the groundborne vibration levels generated by this source have also been quantitatively estimated and compared to applicable thresholds of significance.

Construction Noise Levels

Construction noise levels were estimated by data published by the Federal Transit Administration. Potential noise levels are identified for off-site locations that are sensitive to noise, including existing residences as well as the private parochial high school and convent located to the southeast of the Project Site.

Roadway Noise Levels

Roadway noise levels have been calculated for various locations around the Project Site. The noise levels were calculated using the FHWA-RD-77-108 model and traffic volumes from the Project Traffic Study.

Groundborne Vibration Associated with Construction Equipment

Groundborne vibration levels resulting from construction activities were estimated by data published by the Federal Transit Administration. Potential vibration levels resulting from construction of the Project are identified for off-site locations that are sensitive to vibration, including existing residences and the private high school and convent.

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant noise impact may occur if the proposed project would result in any of the following conditions:

- (a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

- (b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- (c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- (d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- (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 airstrip, expose people residing or working in the project area to excessive noise levels; and
- (f) For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

As discussed in the Initial Study (see Appendix A to this Draft EIR), the Proposed Project would have no impact with respect to Thresholds (e) and (f) listed above. As such, no further analysis of these topics is required (see also Section IV.A of this Draft EIR).

The State CEQA Guidelines do not define the levels at which groundborne vibration or groundborne noises are considered “excessive.” However, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, non-engineered timber and mason buildings can be exposed to ground-borne vibration levels of 0.2 inches per second without experiencing structural damage, while reinforced-concrete, steel, or timber buildings can be exposed to ground-borne vibration levels of 0.5 inches per second.²

The FTA has also established guidelines that provide thresholds for ground-borne vibration causing human annoyance. For residential land uses, which experience occasional events of ground-borne vibration or noise, the FTA has established a threshold of 75 VdB.³ Some commercial buildings, such as auditoriums and theaters have additional vibration and noise annoyance criteria.

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the FTA and California Department of Transportation’s (Caltrans)

² *Ibid.*

³ *Ibid.*

adopted vibration standards for buildings are used to evaluate potential impacts related to Project construction. Based on these standards, impacts relative to groundborne vibration would be considered significant if the following were to occur:

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any off-site reinforced-concrete, steel, or timber structure;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings (i.e., “fragile” buildings);⁴ and
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any building that is extremely susceptible to vibration damage (i.e., “extremely fragile” buildings).⁵

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA’s vibration impact thresholds for human annoyance for long-term operational activities, not construction. These thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, which includes schools and churches. No thresholds have been adopted or recommended for commercial and office uses.

The State CEQA Guidelines also do not define the levels at which temporary increases in ambient noise are considered “substantial.” Therefore, for the purposes of this analysis, noise impacts are evaluated in part by the *L.A. CEQA Thresholds Guide*,⁶ which states that a project would normally have a significant impact on noise from construction if:

- (a) Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA L_{eq} or more at a noise sensitive use;
- (b) Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA L_{eq} or more at a noise sensitive use; or
- (c) Construction activities would exceed the ambient noise level by 5 dBA L_{eq} at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.

⁴ *Ibid.*

⁵ *Ibid.*

⁶ *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006*

In the *L.A. CEQA Thresholds Guide*, CNEL is utilized as a noise descriptor for quantifying the noise impact from construction activities. However, construction typically occurs during the daytime hours, while CNEL describes the overall ambient sound levels over a 24-hour period, including nighttime hours. As supported by the LAMC Section 112.05,⁷ the L_{eq} metric is more applicable when describing the potential noise impact from construction activities, and is likely to be a more conservative criterion than CNEL. Therefore, in this study, the three construction significance thresholds listed above are described in terms of L_{eq} .

Section 112.05 of the LAMC specifies the maximum noise level for powered equipment or powered hand tools. Any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dBA within 500 feet of a residential zone, when measured at a distance of 50 feet from the source, is prohibited. However, the above noise limitation does not apply where compliance is technically infeasible (Section 112.05 of the LAMC). Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. An inability to reduce construction equipment noise exposure to 75 dBA or less at any off-site, noise-sensitive use would be considered a significant temporary noise impact.

With respect to operational noise, the *L.A. CEQA Thresholds Guide* states the following:

A project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” of “clearly unacceptable” category, or any 5 dBA or greater noise increase. (See Table V.H-5, Community Noise Exposure CNEL).

Project Impacts

Construction Noise

Project development would require the use of heavy equipment for site grading and excavation, installation of utilities, paving, and building fabrication. Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity.

The U.S. EPA has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. These data are presented Table V.H-6, Noise

⁷ *City of Los Angeles Municipal Code, Chapter XI Noise Regulation, Article 1 General Provisions, Section 112.05, Rev. No. 63 – 1996.*

Range of Typical Construction Equipment, and V.H-7, Typical Outdoor Construction Noise Levels. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor.

During construction, three basic types of activities would be expected to occur and generate noise. The first activity would involve the preparation of the site for grading by clearing the parcel of debris and vegetation. The second activity would involve the excavation and grading of portions of the Project Site to accommodate the building foundations for the new buildings that are being proposed. Overall, an estimated 4,200 cubic yards of soil would be imported to the Project Site. The third activity that would generate noise during construction would involve the physical construction and finishing of the new residential buildings. A total of 19 detached, single-family homes would be constructed.

Table V.H-6
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Levels in dBA L_{eq} at 50 feet ^a
Front Loader	73–86
Trucks	82–95
Cranes (moveable)	75–88
Cranes (derrick)	86–89
Vibrator	68–82
Saws	72–82
Pneumatic Impact Equipment	83–88
Jackhammers	81–98
Pumps	68–72
Generators	71–83
Compressors	75–87
Concrete Mixers	75–88
Concrete Pumps	81–85
Back Hoe	73–95
Pile Driving (peaks)	95–107
Tractor	77–98
Scraper/Grader	80–93
Paver	85–88
^a Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table. Source: U.S. EPA, 1971.	

Table V.H-7
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74
<i>Source: U.S. EPA, 1971.</i>				

The nearest and most notable off-site sensitive receptors to the Project Site are the existing residential uses bordering the site boundary along San Feliciano Drive and Mulholland Drive. Table V.H-8 summarizes potential increases in ambient noise levels at four off-site sensitive receptors. Along San Feliciano, the nearest off-site residential structure to the Project Site is located adjacent to the site's western boundary. Given this distance, Project construction-related noise levels during excavation and grading may reach approximately 78.6 dBA L_{eq} at this off-site residential property. Along Mulholland Drive, the nearest off-site residential structure to the Project Site is located approximately 55 feet from the site's southwestern boundary. Based on this distance, Project construction-related noise levels during excavation and grading may reach approximately 78.1 dBA L_{eq}.⁸ Therefore, the construction-related noise levels experienced at these off-site, noise-sensitive uses would exceed the City's "conditionally acceptable" exterior noise standard for single-family homes. Furthermore, the construction noise levels associated with the Proposed Project would also exceed the City's noise standard of 75 dBA at 50 feet for powered equipment or powered hand tools within 500 feet of a residential zone, as stated in Section 112.05 of the LAMC.

In addition, a private parochial high school (Louisville High School) and convent is also located southeast of the Project Site, across Mulholland Drive. The nearest classroom building in Louisville High School to the site is located approximately 200 feet to the south. Given this distance from the boundary of the Project Site, construction-related noise levels may reach approximately 72.0 dBA L_{eq}.⁹ Therefore, the construction-related noise levels experienced at this off-site, noise-sensitive use would exceed the City's "conditionally acceptable" exterior noise standard for schools.

⁸ *Ibid.*

⁹ *Ibid.*

**Table V.H-8
Construction Noise Levels - Unmitigated**

Sensitive Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Noise Increase (dBA L_{eq})
Residence, 4641 San Feliciano Drive	75.6	58.9	75.7	16.8
Residence, 4606 San Feliciano Drive	78.5	60.5	78.6	18.1
Residence, 22331 Mulholland Drive	77.7	67.4	78.1	10.7
Louisville High School	66.5	70.6	72.0	1.4
<i>Source: DKA Planning, 2015.</i>				

Section 41.40 of the LAMC regulates noise from demolition and construction activities. Exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Demolition and construction are prohibited on Sundays and all federal holidays. In terms of construction noise, Section 112.02 of the LAMC limits the operation of powered equipment and powered hand tools to between the hours of 7:00 A.M. to 10:00 P.M., and prohibits the noise levels generated by construction machinery from exceeding 75 dBA at 50 feet from residential uses. Via compliance with the LAMC, construction activities associated with the Project would only occur during the permitted hours and, thus, would not occur during recognized sleep hours for residences or on days that residents are most sensitive to exterior noise. As construction activities associated with the Proposed Project would be required to comply with the noise regulations established in Section 41.40 of the LAMC, the potential construction noise impacts on the existing off-site sensitive receptors would be less than significant. Furthermore, implementation of Mitigation Measures H-4 through H-9, which includes the implementation of noise reduction devices and techniques during construction at the Project Site, would further serve to reduce the noise levels associated with construction of the Proposed Project (see Table V.H-15 for estimated mitigated noise levels during Project construction).

As discussed above, construction activities associated with the Project during the daytime could result in noise levels as high as 78.6 dBA L_{eq} at the residential property bordering the Project Site on San Feliciano Drive, 75.7 dBA L_{eq} at the residential property located northwest of the Project Site, 78.1 along Mulholland Drive bordering the site's southwestern-most boundary, and 72.0 dBA L_{eq} at the classroom building in the Louisville High School. These construction activities could potentially represent a substantial temporary or periodic increase in ambient noise levels at these off-site noise sensitive locations.

Based on criteria established in the *L.A. CEQA Threshold Guide*, construction activities lasting more than one day, which would increase ambient exterior noise levels by 10 dBA or more at a noise sensitive use, may result in a significant impact. As shown in Table V.H-3, the construction activities associated with the Project would result in an increase in ambient exterior noise levels at three off-site locations by more

than 10 dBA. It should be noted, however, that the increase in noise levels at these off-site locations during construction at the Project Site would be temporary in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from grading and construction are possible. Implementation of Mitigation Measures H-4 through H-9, which includes the implementation of noise reduction devices and techniques during construction at the Project Site, would reduce the noise levels associated with construction of the Proposed Project (see Table V.H-15 for estimated mitigated noise levels during Project construction). As a result, the mitigated construction noise levels associated with the Proposed Project are not expected to exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three month period or by more than 10 dBA for more than one day, and construction noise impacts would therefore be considered less than significant with mitigation.

Operational Noise

Off-site Vehicular Noise

Long-term noise concerns from the development of the Project have the potential to affect off-site locations, resulting primarily from vehicular traffic utilizing the local roadways along affected roadway segments analyzed in the Project Traffic Study. These concerns were addressed using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) which calculates the L_{eq} noise level for a particular reference set of input conditions, based on site-specific traffic volumes, distances, speeds and/or noise barriers. Based on the Traffic Study prepared for the Project in combination with an analysis of the surrounding land uses, roadway noise levels were forecasted to determine if the Project's vehicular traffic would result in a significant impact at off-site, noise-sensitive receptor locations.

Off-site noise-sensitive locations surrounding the Project Site could experience a slight increase in noise resulting from the additional traffic generated by the Proposed Project. The increases in noise levels at noise-sensitive locations along the study-area roadway segments in the a.m. and p.m. peak hours are identified in Tables V.H-9 and V.H-10, Project Traffic Noise Impacts Off-site, respectively. As shown, the Project would increase local noise levels by a maximum of 0.1 dBA L_{eq} at several roadway segments, while the rest of the analyzed roadway segments would not experience any increases in noise levels. Because the increase in local noise levels at these analyzed roadway segments resulting from implementation of the proposed project would not exceed the 5 dBA threshold established under the *L.A. CEQA Thresholds Guide*, they would not represent a substantial permanent increase in ambient noise levels. Therefore, off-site noise impacts from operational mobile sources would be less than significant.

Table V.H-9
Project Traffic Noise Impacts Off-site (AM Peak Hour)

Roadway Segment	Existing Sensitive Uses Located Along Roadway Segment	Noise Levels in dBA L _{eq} 1 Hour				
		Existing	Existing Plus Project	Increase	Significance Threshold	Significant?
SB San Feliciano Dr b/t Providencia and Dumetz	Residential	60.0	60.0	0.0	5.0	No
NE corner of Dumetz Rd and San Feliciano	Residential	62.8	62.8	0.0	5.0	No
SE corner of Dumetz Rd and San Feliciano	Residential	62.4	62.4	0.0	5.0	No
WB Dumetz Rd b/t San Feliciano and Topanga Cyn	Residential	61.2	61.2	0.0	5.0	No
EB Dumetz Rd b/t San Feliciano and Topanga Cyn	Residential	61.3	61.3	0.0	5.0	No
NB Topanga Cyn Rd b/t San Miguel and Providencia	Residential	69.1	69.2	0.1	5.0	No
SB Topanga Cyn Rd b/t San Miguel and Providencia	Residential	68.9	68.9	0.0	5.0	No
NB Topanga Cyn Rd b/t Dumetz and Mulholland	Residential	69.6	69.6	0.0	5.0	No
SB Topanga Cyn Rd b/t Dumetz and Mulholland	Residential	69.5	69.5	0.0	5.0	No
SB San Feliciano Dr b/t Mulholland and Dumetz	Residential	59.6	59.6	0.0	5.0	No
NB San Feliciano Dr b/t Mulholland and Dumetz	Residential	58.7	58.7	0.0	5.0	No
WB Mulholland Dr b/t San Feliciano and Topanga	Residential and School	64.2	64.2	0.0	5.0	No
NE corner of Mulholland Dr and San Feliciano	Residential and School	64.6	64.7	0.1	5.0	No
NW corner of Mulholland Dr and San Feliciano	Residential	63.2	63.2	0.0	5.0	No
NB Mulholland Hwy b/t Mulholland Dr & Freedom	Residential and School	68.6	68.6	0.0	5.0	No
<i>Traffic Information Source: Crain & Associates, Traffic Impact Study for Proposed Residential Development at 22255 Mulholland Drive, Woodland Hills. April 2015.</i> <i>Table Source: DKA Planning 2015.</i>						

Table V.H-10
Project Traffic Noise Impacts Off-site (PM Peak Hour)

Roadway Segment	Existing Sensitive Uses Located Along Roadway Segment	Noise Levels in dBA L _{eq} 1 Hour				
		Existing	Existing Plus Project	Increase	Significance Threshold	Significant?
SB San Feliciano Dr b/t Providencia and Dumetz	Residential	58.6	58.6	0.0	5.0	No
NE corner of Dumetz Rd and San Feliciano	Residential	61.1	61.1	0.0	5.0	No
SE corner of Dumetz Rd and San Feliciano	Residential	61.0	61.0	0.0	5.0	No
WB Dumetz Rd b/t San Feliciano and Topanga Cyn	Residential	60.2	60.3	0.1	5.0	No
EB Dumetz Rd b/t San Feliciano and Topanga Cyn	Residential	60.4	60.4	0.0	5.0	No
NB Topanga Cyn Rd b/t San Miguel and Providencia	Residential	69.1	69.2	0.1	5.0	No
SB Topanga Cyn Rd b/t San Miguel and Providencia	Residential	68.6	68.6	0.0	5.0	No
NB Topanga Cyn Rd b/t Dumetz and Mulholland	Residential	70.1	70.1	0.0	5.0	No
SB Topanga Cyn Rd b/t Dumetz and Mulholland	Residential	69.7	69.7	0.0	5.0	No
SB San Feliciano Dr b/t Mulholland and Dumetz	Residential	58.7	58.7	0.0	5.0	No
NB San Feliciano Dr b/t Mulholland and Dumetz	Residential	57.4	57.4	0.0	5.0	No
WB Mulholland Dr b/t San Feliciano and Topanga	Residential and School	63.6	63.7	0.1	5.0	No
NE corner of Mulholland Dr and San Feliciano	Residential and School	63.7	63.7	0.0	5.0	No
NW corner of Mulholland Dr and San Feliciano	Residential	62.1	62.1	0.0	5.0	No
NB Mulholland Hwy b/t Mulholland Dr & Freedom	Residential and School	67.5	67.5	0.0	5.0	No

Table V.H-10
Project Traffic Noise Impacts Off-site (PM Peak Hour)

Roadway Segment	Existing Sensitive Uses Located Along Roadway Segment	Noise Levels in dBA L _{eq} 1 Hour				
		Existing	Existing Plus Project	Increase	Significance Threshold	Significant?
Traffic Information Source: Crain & Associates, Traffic Impact Study for Proposed Residential Development at 22255 Mulholland Drive, Woodland Hills. April 2015.						
Table Source: DKA Planning 2015.						

On-site Operational Noise

HVAC Systems

Upon completion of the Project, new sources of noise would include stationary sources (such as, rooftop heating, ventilation, and air conditioning [HVAC] systems for the residential and retail uses). The HVAC systems that would be installed for the new residential buildings would typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. As discussed previously, 24-hour CNEL noise levels are about 6.7 dBA greater than 24-hour L_{eq} measurements. As such, the HVAC equipment associated with the proposed residences could generate noise levels that average between 47 to 57 dBA CNEL at 50 feet from the source when the equipment is operating continuously over 24-hour period. However, many of the proposed new homes would be located within 50 feet of each other, with some as close as 12 feet. Thus, noise levels associated with the HVAC systems of the proposed new homes could exceed the City's exterior noise level standard of 60 dBA CNEL for single-family residential uses; therefore, this impact would be potentially significant. Implementation of Mitigation Measure H-14 below would require the provision of proper shielding for all new HVAC systems used by the proposed residential uses such that the interior noise levels at each proposed new home would be below 45 dBA CNEL.

Construction-Related Groundborne Vibration

Construction activities that would occur within the Project Site would include demolition and excavation, which would have the potential to generate low levels of groundborne vibration. Table V.H-11, Vibration Source Levels for Construction Equipment, identifies various vibration velocity levels for the types of construction equipment that would operate during the construction of the proposed project.

Table V.H-11
Vibration Source Levels for Construction Equipment

Construction Equipment	Approximate PPV at 25 feet (inches per second)
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003
<i>Source: Federal Transit Administration 2006.</i>	

Based on the information presented in Table V.H-10, vibration levels could reach as high as approximately 0.124 inches per second PPV within 25 feet of the Project Site from the operation of construction equipment.

Construction activities would have the potential to impact the nearest off-site sensitive receptors to the Project site, which includes the existing residential properties bordering the site along San Feliciano Drive and Mulholland Drive. In addition, the Louisville High School and convent located south of the site across Mulholland Drive may also be adversely affected by construction activities on the Project Site. As discussed under Thresholds of Significance above, the Federal Transit Administration has established vibration impact thresholds for sensitive buildings, residences, and institutional land uses. These thresholds include a threshold of 0.2 inches per second PPV at any non-engineered timer and masonry building at which building damage could occur.

As mentioned previously, the nearest off-site residential property is located along San Feliciano Drive, adjacent to the western boundary of the Project Site. As shown in Table V.H-12, the vibration level that would be experienced by the residences in this complex would be approximately 0.124 inches per second PPV. In addition, the nearest off-site residential property to the Project Site located along Mulholland Drive is approximately 55 feet from the site's southwestern boundary. Based on this distance, Project construction-related vibration levels may reach approximately 0.027 inches per second PPV at this off-site residential property.¹⁰ Because the vibration levels experienced at both of these off-site properties would not exceed the FTA's recommended thresholds for building damage of 0.2 inches per second for non-engineered buildings, this impact would be less than significant.

As for the Louisville High School, the nearest classroom is located approximately 200 feet from the southern boundary of the Project Site. Consequently, the vibration level that would be experienced by the Louisville High School classroom would be approximately 0.004 inches per second PPV. The vibration

¹⁰ *Ibid.*

levels at this location would not exceed the FTA's recommended thresholds for building damage of 0.2 inches per second for non-engineered buildings and this impact would be less than significant.

Table V.H-12
Vibration Levels at Off-Site Sensitive Uses from Project Construction - Unmitigated

Sensitive Receptor	Estimated PPV (in/sec)^a	Significance Threshold (in/sec)	Significant?	Estimated Vibration Levels (VdB)^b
Residence, 4641 San Feliciano Drive	0.019	0.2	No	74
Residence, 4606 San Feliciano Drive	0.124	0.2	No	90
Residence, 22331 Mulholland Drive	0.027	0.2	No	77
Louisville High School	0.004	0.2	No	60
^a The vibration velocities at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where PPV_{equip} = peak particle velocity in in/sec of equipment, PPV_{ref} = reference vibration level in in/sec at 25 feet, D = distance from the equipment to the receiver. ^b The vibration levels at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report: $L_v(D) = L_v(25 \text{ ft}) - 30 \log(D/25)$, where L_v = vibration level of equipment, D = distance from the equipment to the receiver, $L_v(25 \text{ ft})$ = vibration level of equipment at 25 feet.				
Source: DKA Planning, 2015.				

In terms of human annoyance, the vibration levels experienced at off-site sensitive receptors could range from 60 VdB at Louisville High School to 90 VdB at the 4606 San Feliciano Drive residence. Pursuant to FTA guidance, the vibration impacts from construction of the Project would exceed the 80 VdB considered acceptable at this sensitive receptor location. However, any annoyance would be temporary and would not be evaluated against FTA standards that are generally applied to long-term operations.

The construction activities associated with the Proposed Project would be required to comply with Section 41.40 of the LAMC, which prohibits exterior demolition and construction activities between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. As such, demolition and construction would not occur during recognized sleep hours. Nevertheless, because sensitive noise receptors may be in close proximity to active construction during early evening hours, a potentially significant impact could occur. Implementation of Mitigation Measures H-11 and H-12 would serve to reduce the amount of vibration experienced at off-site noise-sensitive uses by requiring the location of construction staging and the operation of earthmoving equipment to be located as far away from vibration-sensitive receptors as possible, and for heavily loaded trucks to be routed away from the surrounding residential streets to the extent possible.

CUMULATIVE IMPACTS

This cumulative impact analysis considers development of the Project in combination with ambient growth and other development within the vicinity of the Project Site. As noise is a localized phenomenon, and drastically reduces in magnitude as distance from the source increases, only projects and growth in the nearby area could potentially combine with the Proposed Project to result in cumulative noise impacts.

Development of the Proposed Project in combination with other cumulative development projects in the surrounding area would result in an increase in construction-related and traffic-related noise in this area of the City. However, each potential cumulative development project would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. In addition, each project would also be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool within 500 feet from a residential zone from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible. With conformance with LAMC Sections 41.40 and 112.05, the cumulative construction noise impact would be less than significant.

Future construction associated with cumulative development in the area could result in a cumulatively significant impact with respect to temporary or periodic increases in ambient noise levels. Construction noise is localized in nature and decreases substantially with distance. Consequently, in order to achieve a substantial cumulative increase in construction noise levels, more than one source emitting high levels of construction noise would need to be in close proximity to the Proposed Project. However, the closest proposed development project to the Project Site is located 1.3 miles to the north, adjacent to the US 101 (Ventura) Freeway. At this distance, construction noise generated at each site would not be cumulatively considerable. As with the Proposed Project, this cumulative development project would be required to limit construction during the permitted hours designated in Section 41.40 of the LAMC and, thus, would not generate construction noise during recognized sleep hours for residences or on days that residents are most sensitive to exterior noise. Mitigation Measures H-4 through H-12 would serve to reduce the noise levels associated with construction at the Project Site to a less than significant level; as a result, construction noise levels would not exceed the thresholds in the *L.A. CEQA Threshold Guide*. Therefore, the cumulative impact of the Proposed Project associated with a temporary or periodic increase in ambient noise levels caused by the construction activities would be less than significant with mitigation.

Cumulative development in the City may result in the exposure of people to or the generation of excessive groundborne vibration. As mentioned above, the closest proposed project to the Project Site is located 1.3 miles to the north, and thus would not contribute to cumulative vibration impacts with the Proposed Project. Regardless, implementation of recommended Mitigation Measures H-11 and H-12 would serve to reduce the vibration levels associated with construction at the Project Site to the maximum extent feasible. Therefore, the cumulative impact contribution of the Proposed Project would be less than significant.

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the Proposed Project and other projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the Proposed Project to the future cumulative base traffic volumes in the Project vicinity. The cumulative noise levels at the surrounding sensitive noise receptors associated with traffic in the AM and PM peak hours are identified in Tables V.H-13 and V.H-14, respectively.

Table V.H-13
Cumulative Future Traffic Noise Impacts (AM Peak Hour)

Roadway Segment	Existing Sensitive Uses Located Along Roadway Segment	Noise Levels in dBA L_{eq} 1 Hour				
		Existing	Existing Plus Project	Increase	Significance Threshold	Significant?
SB San Feliciano Dr b/t Providencia and Dumetz	Residential	60.2	60.3	0.1	5.0	No
NE corner of Dumetz Rd and San Feliciano	Residential	62.0	62.0	0.0	5.0	No
SE corner of Dumetz Rd and San Feliciano	Residential	62.6	62.7	0.1	5.0	No
WB Dumetz Rd b/t San Feliciano and Topanga Cyn	Residential	61.3	61.5	0.2	5.0	No
EB Dumetz Rd b/t San Feliciano and Topanga Cyn	Residential	61.4	61.5	0.1	5.0	No
NB Topanga Cyn Rd b/t San Miguel and Providencia	Residential	69.4	69.4	0.0	5.0	No
SB Topanga Cyn Rd b/t San Miguel and Providencia	Residential	69.2	69.2	0.0	5.0	No
NB Topanga Cyn Rd b/t Dumetz and Mulholland	Residential	69.8	69.8	0.0	5.0	No
SB Topanga Cyn Rd b/t Dumetz and Mulholland	Residential	69.8	69.8	0.0	5.0	No
SB San Feliciano Dr b/t Mulholland and Dumetz	Residential	59.7	59.9	0.2	5.0	No
NB San Feliciano Dr b/t Mulholland and Dumetz	Residential	58.8	59.0	0.2	5.0	No
WB Mulholland Dr b/t San Feliciano and Topanga	Residential and School	64.4	64.4	0.0	5.0	No
NE corner of Mulholland Dr and San Feliciano	Residential and School	64.9	65.0	0.1	5.0	No

Table V.H-13
Cumulative Future Traffic Noise Impacts (AM Peak Hour)

Roadway Segment	Existing Sensitive Uses Located Along Roadway Segment	Noise Levels in dBA L _{eq} 1 Hour				
		Existing	Existing Plus Project	Increase	Significance Threshold	Significant?
NW corner of Mulholland Dr and San Feliciano	Residential	63.4	63.5	0.1	5.0	No
NB Mulholland Hwy b/t Mulholland Dr & Freedom	Residential and School	68.8	68.8	0.0	5.0	No
<i>Traffic Information Source: Crain & Associates, Traffic Impact Study for Proposed Residential Development at 22255 Mulholland Drive, Woodland Hills. April 2015.</i> <i>Table Source: DKA Planning 2015.</i>						

Table V.H-14
Cumulative Future Traffic Noise Impacts (PM Peak Hour)

Roadway Segment	Existing Sensitive Uses Located Along Roadway Segment	Noise Levels in dBA L _{eq} 1 Hour				
		Existing	Existing Plus Project	Increase	Significance Threshold	Significant?
SB San Feliciano Dr b/t Providencia and Dumetz	Residential	58.8	59.0	0.2	5.0	No
NE corner of Dumetz Rd and San Feliciano	Residential	61.4	61.5	0.1	5.0	No
SE corner of Dumetz Rd and San Feliciano	Residential	61.2	61.4	0.2	5.0	No
WB Dumetz Rd b/t San Feliciano and Topanga Cyn	Residential	60.4	60.6	0.2	5.0	No
EB Dumetz Rd b/t San Feliciano and Topanga Cyn	Residential	60.5	60.7	0.2	5.0	No
NB Topanga Cyn Rd b/t San Miguel and Providencia	Residential	69.4	69.4	0.0	5.0	No
SB Topanga Cyn Rd b/t San Miguel and Providencia	Residential	68.9	68.9	0.0	5.0	No
NB Topanga Cyn Rd b/t Dumetz and Mulholland	Residential	70.3	70.3	0.0	5.0	No

Table V.H-14
Cumulative Future Traffic Noise Impacts (PM Peak Hour)

Roadway Segment	Existing Sensitive Uses Located Along Roadway Segment	Noise Levels in dBA L_{eq} 1 Hour				
		Existing	Existing Plus Project	Increase	Significance Threshold	Significant?
SB Topanga Cyn Rd b/t Dumetz and Mulholland	Residential	69.9	69.9	0.0	5.0	No
SB San Feliciano Dr b/t Mulholland and Dumetz	Residential	58.9	58.9	0.0	5.0	No
NB San Feliciano Dr b/t Mulholland and Dumetz	Residential	57.6	57.6	0.0	5.0	No
WB Mulholland Dr b/t San Feliciano and Topanga	Residential and School	63.9	63.9	0.0	5.0	No
NE corner of Mulholland Dr and San Feliciano	Residential and School	63.9	63.9	0.0	5.0	No
NW corner of Mulholland Dr and San Feliciano	Residential	62.3	62.4	0.0	5.0	No
NB Mulholland Hwy b/t Mulholland Dr & Freedom	Residential and School	67.8	67.8	0.0	5.0	No
<i>Traffic Information Source: Crain & Associates, Traffic Impact Study for Proposed Residential Development at 22255 Mulholland Drive, Woodland Hills. April 2015.</i> <i>Table Source: DKA Planning 2015.</i>						

As shown in Tables V.H-12 and V.H-13, cumulative development would increase local noise levels by a maximum of 0.2 dBA CNEL along several road segments in the area, inaudible increases to the human ear. Because none of the roadway segments would experience an increase in local noise levels by more than 5.0 dBA CNEL, the resulting cumulative impact would be less than significant.

With respect to stationary sources, the major stationary source of noise that would be introduced by cumulative development in the area would likely be HVAC equipment associated with the new developments. As discussed previously, the HVAC systems that are installed for new residential buildings would typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment, while those for new commercial developments would generally produce noise levels of around 57 to 72 dBA CNEL at a distance of 50 feet. Depending on the distance these HVAC systems may be located from potential noise-sensitive uses at, or surrounding, these project sites, noise impacts at individual sites could be potentially significant. However, given that the only identified cumulative development site in the vicinity of the Proposed Project is located 1.3 miles away, and the fact that noise is a localized phenomenon, a significant increase in ambient noise from the operation of the HVAC

systems associated with cumulative development in the vicinity would not occur. Thus, the cumulative stationary noise impact would be less than significant.

MITIGATION MEASURES/REGULATORY COMPLIANCE MEASURES

Construction

The following Regulatory Compliance Measures must be adhered to during construction of the Proposed Project:

- H-1** The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.
- H-2** The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- H-3** Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.

Additionally, the following Project Mitigation Measures are required to address construction-related noise and vibration impacts:

- H-4** Construction and demolition activities shall be scheduled to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- H-5** The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills, jackhammers, and pile drivers.
- H-6** Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.
- H-7** Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 150 feet from the adjacent, off-site residential buildings.

- H-8** All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance.
- H-9** Temporary sound barriers, capable of achieving a sound attenuation of at least 12 dBA (e.g., construction sound wall with sound blankets) at 50 feet of distance, and capable of blocking the line-of-sight to the adjacent residences shall be installed as feasible.
- H-10** Two weeks prior to the commencement of construction at the Project Site, notification must be provided to the off-site residential uses located along Mulholland Drive and San Feliciano Drive, and to Louisville High School, disclosing the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.
- H-11** The Project Applicant shall locate construction staging areas and the operation of earthmoving equipment as far away from vibration-sensitive receptors as possible.
- H-12** The Project Applicant shall ensure that heavily loaded trucks used during construction shall be restricted to Mulholland Drive and Topanga Canyon Road, and shall be routed away from residential streets surrounding the Project Site.

Operational

The following Regulatory Compliance Measures must be adhered to during operation of the Proposed Project:

- H-13** The Project Applicant must comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which ensure an acceptable interior noise environment.
- H-14** The Project Applicant shall ensure that proper shielding will be provided for all new HVAC systems used by each proposed new home such that the interior noise levels at each new home and at existing nearby homes would be below 45 dBA CNEL.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With compliance with Section 41.40 of the LAMC and the implementation of Mitigation Measures and Regulatory Compliance Measures H-1 through H-14 listed above, which includes the implementation of noise reduction devices and techniques during construction at the Project Site, construction-related noise impacts associated with the Proposed Project would be reduced to the maximum extent feasible (see Table V.H-15). Because construction noise levels would not exceed existing ambient noise levels by more than 5 dBA for more than 10 days in a three-month period or by more than 10 dBA for more than

one day, short-term construction noise impacts would be considered less than significant following implementation of mitigation measures.

Table V.H-15
Construction Noise Levels - Mitigated

Sensitive Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Noise Increase (dBA L_{eq})
Residence, 4641 San Feliciano Drive	60.6	58.9	62.8	3.9
Residence, 4606 San Feliciano Drive	63.5	60.5	65.3	4.8
Residence, 22331 Mulholland Drive	62.7	67.4	68.7	1.3
Louisville High School	66.5	70.6	72.0	1.4
<i>Source: DKA Planning, 2015.</i>				

With implementation of Mitigation Measures H-11 and H-12, which serve to locate vibration-generating equipment and vehicles as far away from vibration-sensitive sites as possible, the on-site construction-related vibration impacts associated with the Proposed Project would be reduced. Regardless of whether these mitigation measures are implemented, the groundborne vibration levels experienced by these off-site sensitive receptors would not exceed the Federal Transit Administration's vibration impact threshold for building damage, and any short-term impacts would be considered less than significant.

With implementation of Regulatory Compliance Measures H-13 and H-14, the interior noise levels at each new home and neighboring sensitive receptors would be below 45 dBA CNEL. Thus, noise impacts associated with HVAC systems would be reduced to a less than significant level.

V.I TRANSPORTATION/TRAFFIC

INTRODUCTION

The information in this section is based primarily on the following document (refer to Appendix J):

- *Traffic Impact Analysis for Proposed Residential Development, Crain & Associates, April 16, 2015.*

ENVIRONMENTAL SETTING

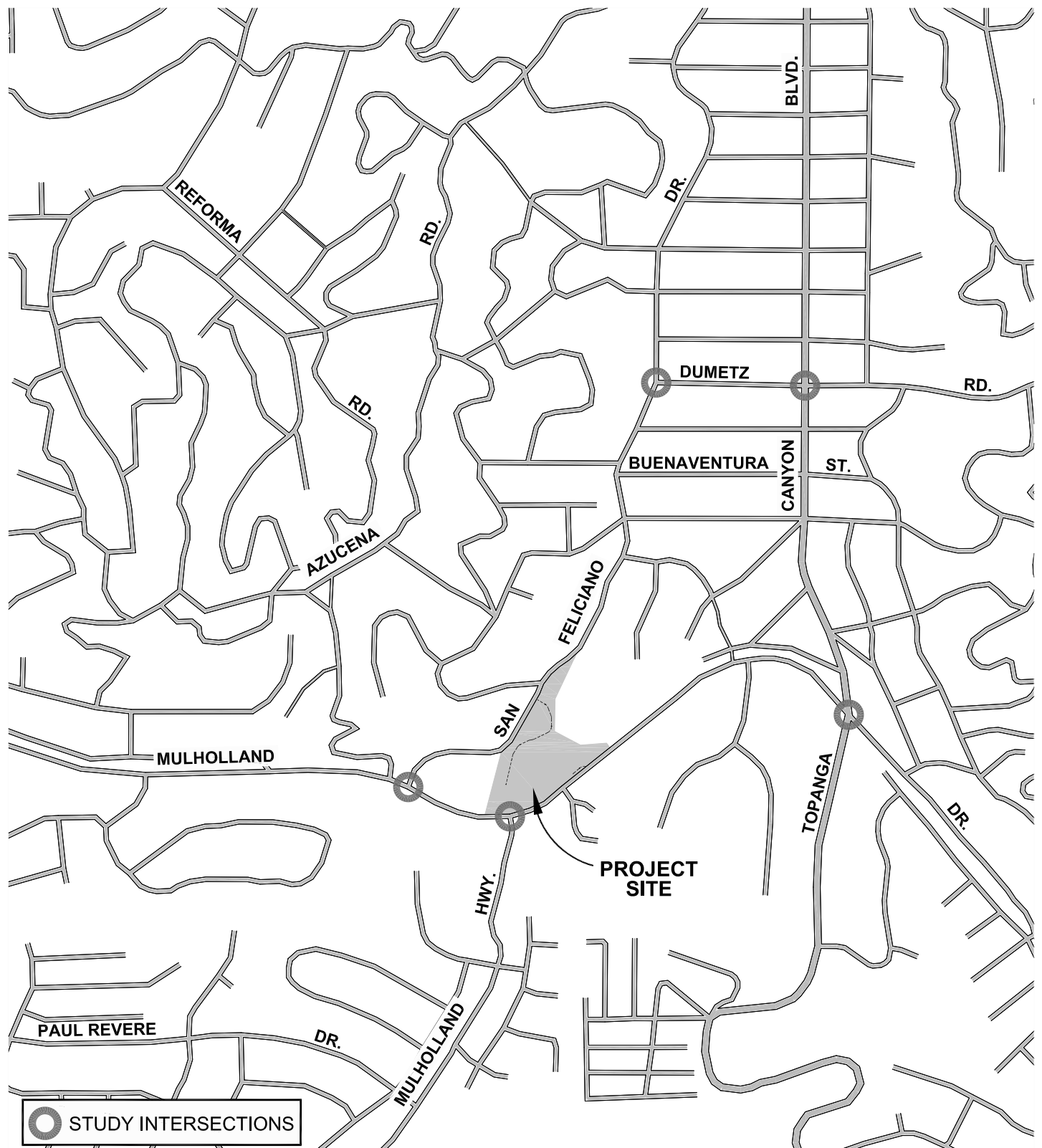
Study Area

Detailed traffic analyses of existing conditions were performed at the following five study intersections (refer to Figure V.I-1):

1. Dumetz Road and San Feliciano Drive (all-way stop-controlled [AWSC])
2. Dumetz Road and Topanga Canyon Boulevard (signalized)
3. Mulholland Drive and San Feliciano Drive (two-way stop-controlled [TWSC])
4. Mulholland Drive and Mulholland Highway (signalized)
5. Mulholland Drive and Topanga Canyon Boulevard (signalized)

These five study intersections represent the locations expected to experience the majority of Project trips, and therefore are where potential Project impacts of significance might occur. Although the Los Angeles Department of Transportation's (LADOT) current "*Traffic Study Policies & Procedures*" (August 2014) recommends that only signalized intersections be selected for analysis, it does include a policy for the evaluation of unsignalized intersections if they are adjacent to a project site and/or are expected to be integral to a project's access and circulation. In the event that the overall delay for an unsignalized intersection is determined to be Level of Service E or F for the Future with Project condition, then further evaluation involving traffic signal warrant analysis would be necessary to determine whether the installation of a traffic signal may be required at that location. Accordingly, the two unsignalized study intersections, Dumetz Road and San Feliciano Drive and Mulholland Drive and San Feliciano Drive, were analyzed under this policy, rather than for the purpose of an impact analysis.

The three signalized study intersections operate with LADOT's Adaptive Traffic Control System (ATCS), an upgrade of the Automated Traffic Surveillance and Control System (ATSAC). LADOT estimates that ATSAC/ATCS improves overall intersection capacity by an average of 10 percent.



Source: Crain and Associates, 2015.

Methodology

The methodology used in the traffic study for the analysis and evaluation of each study intersection is based on procedures outlined in Circular Number 212, published in 1980 by the Transportation Research Board. In the discussion of Critical Movement Analysis for signalized intersections, procedures have been developed for determining operating characteristics of an intersection in terms of the "Level of Service" (LOS) provided for different levels of traffic volume and other variables, such as the number of critical signal phases and traffic lanes.

The term "Level of Service" describes the quality of traffic flow, ranging from excellent conditions at LOS A to failure conditions at LOS F. LOS D is recognized by many cities as an acceptable service level in urban areas. LOS E is recognized by some cities as an acceptable standard in downtown areas, major commercial areas, and at freeway ramp intersections.

Determination of the LOS at an intersection, where traffic volumes are known or have been projected, can be obtained through a summation of the critical movement volumes at that intersection. Once the critical movement volumes have been summed, the values indicated on Table V.I-1 can be used to determine the applicable LOS.

Table V.I-1
CMA Volume Ranges per Level of Service*

LOS	Maximum Sum of Critical Volumes (VPH) vs. Number of Signal Phases		
	Two Phases	Three Phases	Four or More Phases
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	NA	NA	NA
* For planning applications only. Not appropriate for operations/design applications.			

"Capacity" represents the maximum total hourly volume of vehicles, i.e., vehicles per hour (VPH), in the critical lanes that is reasonably expected to proceed through an intersection under prevailing roadway and traffic conditions. For planning purposes, capacity equates to the maximum value of LOS E, as indicated on Table V.I-1. The volume-to-capacity (V/C) ratios used in the traffic study were calculated by dividing the sum of critical movement volumes by the appropriate capacity value for the type of signal control present or proposed at the three signalized study intersections. Table V.I-2 presents the LOS corresponding to a range of V/C ratios. The V/C ratios and the corresponding service levels for existing traffic conditions at the study intersections were thus determined. Per LADOT policy, the V/C ratios were reduced by 0.100 in order to approximate the 10 percent increase in intersection capacity attributable to ATSAC/ATCS.

Table V.I-2
LOS Definitions for Signalized Intersections (CMA Method)

LOS	Intersection Capacity Utilization	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several cycles.
F	> 1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.
<i>Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980.</i>		

Existing Street System

Freeways

The Ventura Freeway (US-101), located approximately one mile north of the Project Site, provides regional access to the study area. It is a continuous route westward and northward through the San Fernando Valley as US Highway 101, and eastward through the Cities of Burbank, Glendale and Pasadena as State Route 134 (SR-134). From its junction with SR-134, US-101 continues in a southeasterly alignment as the Hollywood Freeway, accessing Downtown Los Angeles and points beyond. The Ventura Freeway has five mainline travel lanes in each direction in the Project study area. A full interchange is provided at Topanga Canyon Boulevard (SR-27), and also at Valley Circle Boulevard/Mulholland Drive, northwest of the Project Site. In addition, there are a northbound off-ramp and southbound on- and off-ramps at Ventura Boulevard, east of Shoup Avenue.

Streets and Highways

North-South Streets

Topanga Canyon Boulevard (SR-27) is a north-south oriented roadway less than one-half mile east of the Project Site. It is State Route 27 (SR-27), extending from the Ronald Reagan Freeway (SR-118) on the

north to Pacific Coast Highway (SR-1) on the south. In the City of Los Angeles, Topanga Canyon Boulevard is designated a Boulevard II and an Avenue II north and south of Mulholland Drive, respectively. This highway generally provides two travel lanes in each direction. At Mulholland Drive, Topanga Canyon Boulevard has a northbound left-turn lane.

Mulholland Highway extends northeast-southwest and forms a “T” intersection with Mulholland Drive at the southern edge of the Project Site. It is designated a Local Street in the City of Los Angeles and an Arterial in the City of Calabasas. South of the City of Calabasas, Mulholland Highway provides east-west access through the Malibu Creek State Park. Near the Project Site, Mulholland Highway has two travel lanes in each direction and a northbound left-turn lane. It has a Class II bike lane on a short segment directly south of Mulholland Drive.

San Feliciano Drive, which forms the western boundary of the Project Site, is a designated Collector Street. It provides north-south access in the Project vicinity. San Feliciano Drive winds northerly from Mulholland Drive to Avenue San Luis, where it forms a jogged intersection, and continues to its northern terminus at Ventura Boulevard. North of the Project Site, between Ybarra Road and Dumetz Road, speed humps are installed as traffic calming devices. In the study area, San Feliciano Drive has one travel lane in each direction.

East-West Streets

Dumetz Road, a designated Collector Street, extends continuously from its eastern terminus at Serrania Avenue to San Feliciano Drive. The “T” intersection of Dumetz Road and San Feliciano Drive is controlled by a stop sign on each leg. At Topanga Canyon Boulevard, Dumetz Road has a westbound left-turn lane, along with a Class II bike lane on its east leg.

Mulholland Drive generally runs in an east-west direction. It forms the southern and southeasterly boundaries of the Project Site. Designated an Avenue I, as well as a Scenic Highway, Mulholland Drive generally provides one to two travel lanes in each direction, along with left-turn channelization. There is a sharrowed bike route on Mulholland Drive from Topanga Canyon Boulevard to west of San Feliciano Drive, where it transitions to a Class II bike lane.

Existing Transit System

The Project Site is directly served by one Metro local bus line, Line 169. Line 169 operates seven days a week with hourly service. Within the study area, it runs along Mulholland Drive and Topanga Canyon Boulevard (SR-27). A bus stop is provided on Mulholland Drive at its intersection with Mulholland Highway near the southern edge of the Project Site.

In the surrounding area, Metro Lines 161, 150/240, 244/255, and 750 provide service along Ventura Boulevard and Topanga Canyon Boulevard (SR-27), with connection to the Warner Center Transit Hub and the Metro Orange Line. Additional transit service includes the Commuter Express Lines 422 and

423, which have peak-period weekday service to Downtown Los Angeles, running along Venture Boulevard and US-101.

When transfer opportunities are considered, these lines provide adequate transit access to the Project Site, surrounding area and the greater Los Angeles region.

Existing Traffic Volumes and Levels of Service

Traffic volumes for existing weekday conditions at the five study intersections were obtained from manual traffic counts conducted on March 12, 2015 in accordance with LADOT requirements. The traffic counts covered the 7:00-10:00 AM and 3:00-6:00 PM peak-hour periods. The peak-hour volumes for each study intersection were determined on the basis of the combined four highest consecutive 15-minute traffic counts for all vehicular movements entering the intersection. The existing peak-hour volumes at the study intersections are depicted on Figures V.I-2 and V.I-3 and are shown in Table V.I-3.

ENVIRONMENTAL IMPACTS

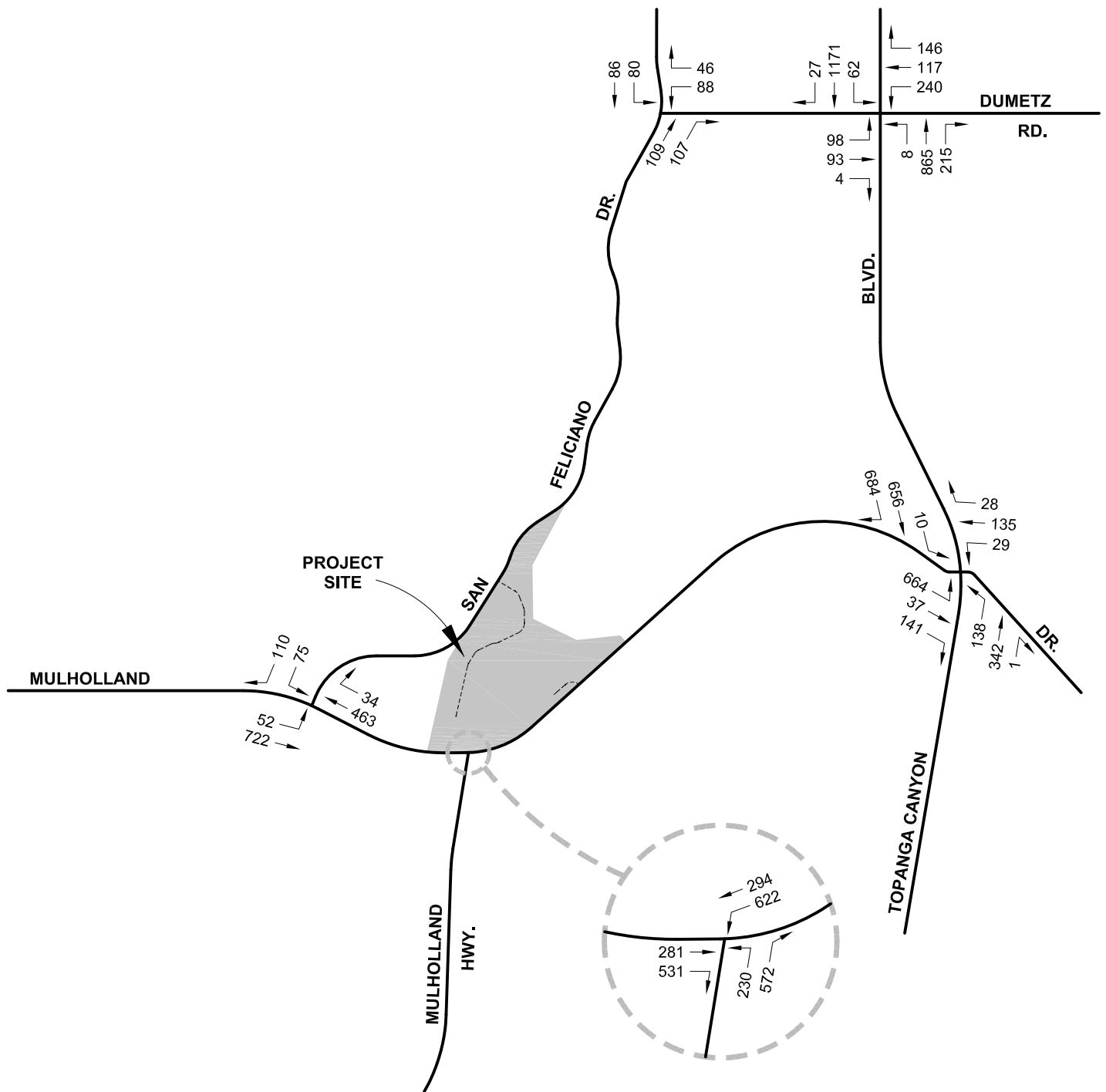
Thresholds of Significance

Appendix G of the CEQA Guidelines

In accordance with Appendix G to the *CEQA Guidelines*, a project would have a significant impact on traffic or transportation if it would cause any of the following conditions to occur:

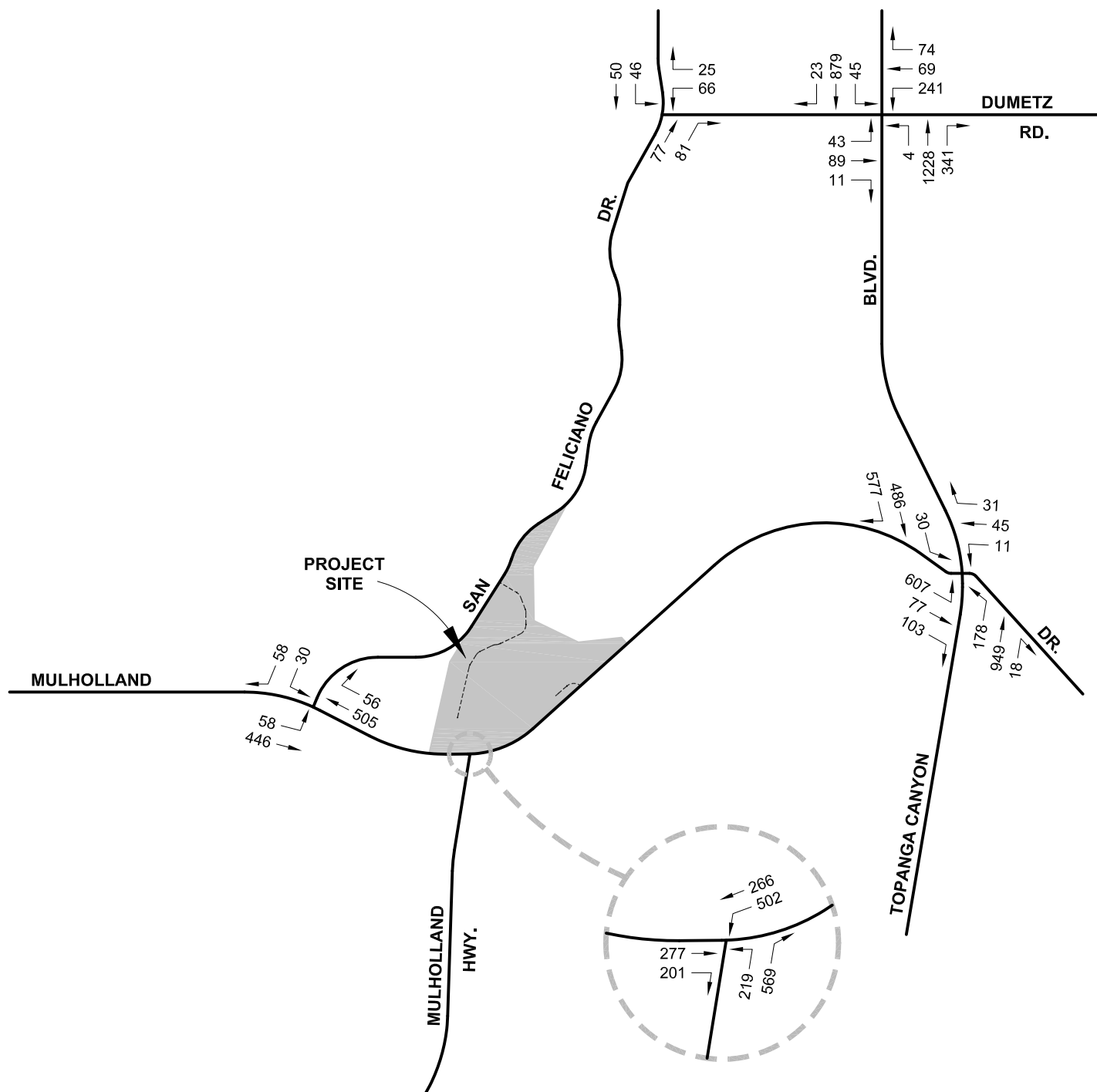
- (a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit;
- (b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- (c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- (d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- (e) Result in inadequate emergency access; or

- (f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.



Source: Crain and Associates, 2015.





Source: Crain and Associates, 2015.



**Table V.I-3
LOS Analysis Summary
Existing (2015) and Future (2018) Peak-Hour Conditions**

Int. No.	Intersection	Peak hour	Existing (2015)					Future (2018)				
			Without Project		With Project			Without Project		With Project		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	CMA	LOS	Impact
1	Dumetz Road & San Feliciano Drive ¹	AM	8.6	A	8.7	A	NA	8.8	A	8.8	A	NA
		PM	7.9	A	7.9	A	NA	7.9	A	8.0	A	NA
2	Dumetz Road & Topanga Canyon Boulevard	AM	0.719	C	0.724	C	0.005	0.769	C	0.775	C	0.006
		PM	0.715	C	0.717	C	0.002	0.765	C	0.767	C	0.002
3	Mulholland Drive & San Feliciano Drive ¹	AM	24.6	C	24.8	C	NA	29.0	D	29.2	D	NA
		PM	16.1	C	16.2	C	NA	17.2	C	17.3	C	NA
4	Mulholland Drive & Mulholland Highway	AM	0.790	C	0.791	C	0.001	0.845	D	0.845	D	0.000
		PM	0.600	B	0.601	B	0.001	0.643	B	0.644	B	0.001
5	Mulholland Drive & Topanga Canyon Boulevard	AM	0.641	B	0.642	B	0.001	0.686	B	0.687	B	0.001
		PM	0.586	A	0.587	A	0.001	0.628	B	0.629	B	0.001
¹ Unsignalized intersection; per LADOT criteria, were not analyzed for impacts but to determine if a traffic signal warrant analysis is necessary. Source: Crain & Associates, 2015.												

City of Los Angeles CEQA Thresholds Guide

In accordance with the *L.A. CEQA Thresholds Guide*, a proposed project would have a significant impact on traffic or transportation if it would cause any of the following conditions to occur:

- (a) Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?
- (b) Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

Intersection Capacity

A project would normally have a significant impact on intersection capacity if the traffic it generates would increase the V/C ratio describing intersection operating conditions by the specific amounts shown in Table V.I-4.

**Table V.I-4
LADOT Significance Thresholds**

Intersection Conditions with Project Traffic		Project-related Increase in V/C Ratio
LOS	V/C	
C	0.701 - 0.800	Equal to or greater than 0.04
D	0.801 - 0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01
<i>Source: LADOT</i>		

Project Impacts

Intersection Level of Service

Project Trip Generation

The number of trips to be generated by the Project was calculated using trip generation rates from the current Institute of Transportation Engineers (ITE) Trip Generation manual, 9th Edition. The applicable trip generation rates are shown below on Table V.I-5.

Table V.I-5
Project Trip Generation Rates

Single-Family Detached Housing – (ITE Land Use 210)	
Daily Trips:	T = 9.52 (U)
AM Peak Hour::	T = 0.75 (U); I/B = 25%, O/B = 75%
PM Peak Hour:	T = 1.00 (U); I/B = 63%, O/B = 37%
<i>T = Trip Ends, I/B = Inbound Trip Percentage</i> <i>U = Number of residential Units, O/B = Outbound Trip Percentage</i>	

Applying the above rates, the Project's trip generation for the weekday daily, AM peak-hour, and PM peak-hour periods were calculated. The trip generation calculations were reviewed and approved by LADOT. As shown on Table V.I-6, it is estimated that the Project would generate 181 daily trips, including 14 trips during the AM peak hour and 19 trips during the PM peak hour.

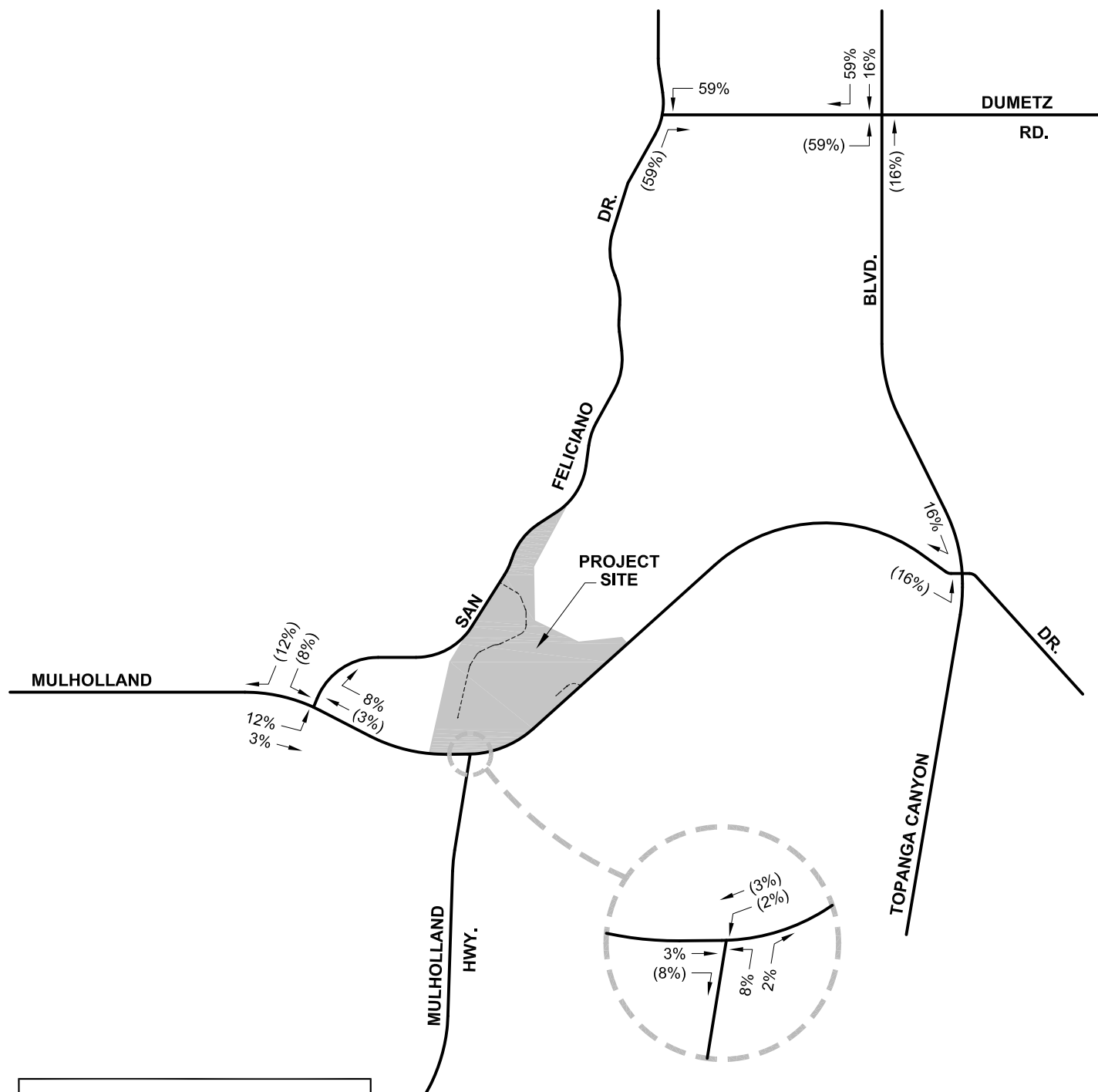
Table V.I-6
Project Trip Generation

Size/Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Single-Family Detached Housing – 19 houses	181	4	10	14	12	7	19
<i>Source: Crain & Associates, 2015.</i>							

Project Trip Distribution

The general trip distribution pattern for the Project was developed considering the nature of the proposed Project use, current traffic patterns, characteristics of the surrounding roadway system, location of the Project Site and its proximity to freeways and major travel routes, and geographic areas to which Project residents would likely be destined.

Based on these factors, estimates of the overall geographic trip distribution percentages are shown on Table V.I-7 and illustrated in Figure V.I-4. These distribution percentages were also reviewed and approved by LADOT.



Source: Crain and Associates, 2015.



Table V.I-7
Project Geographic Trip Distribution Percentages

Direction	Total
North	30%
South	15%
East	30%
West	25%
Totals	100%

Source: Crain & Associates, 2015.

Project Trip Assignment

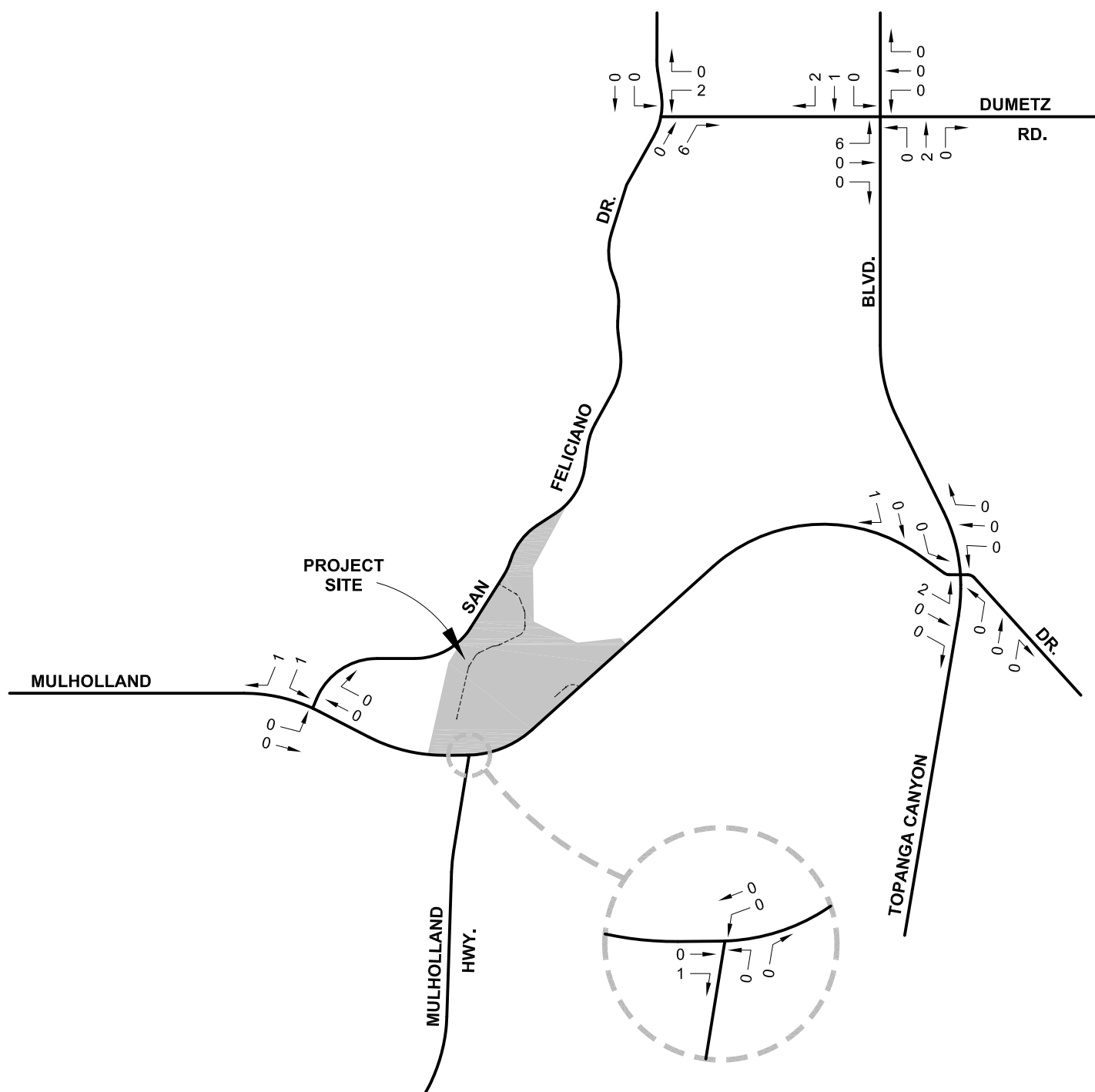
The Project trip assignment percentages for the streets and intersections expected to be used for site access were estimated on the basis of the trip distribution percentages on Table V.I-7 along with the location of Project Site access points and the distribution of dwelling units relative to the access points.

Existing With Project Conditions

The “Existing With Project Traffic” conditions are defined by the traffic volumes, roadways, and intersection configurations and controls that currently exist in the year 2015, and the addition of traffic that would be generated by the completed Project. The Project-only traffic volumes that were described in the previous section and shown on Figures V.I-5 and V.I-6 were added to the existing traffic volumes on Figures V.I-2 and V.I-3. This produced the Existing With Project peak-hour volumes shown on Figure V.I-7 and V.I-8.

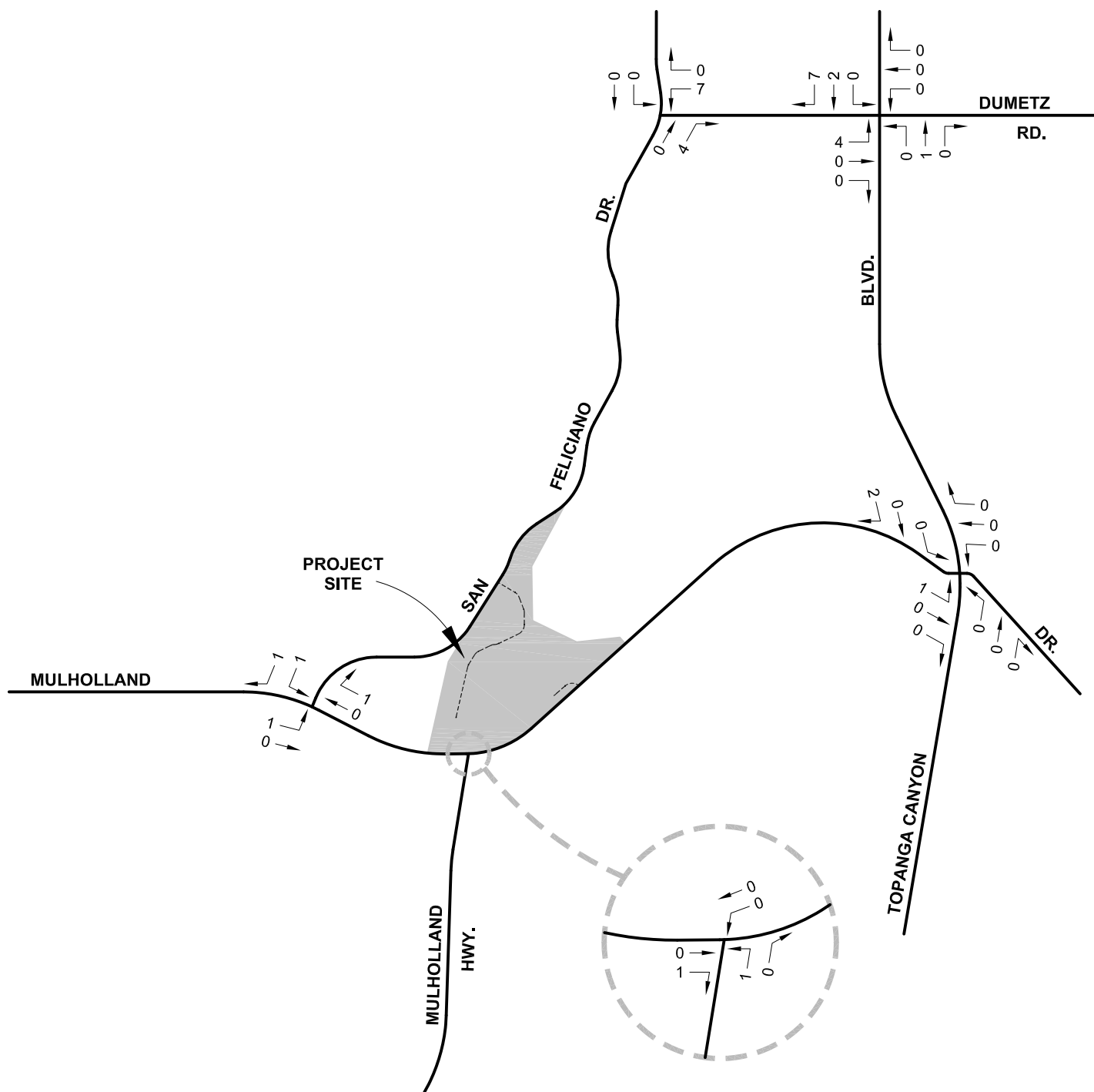
The Existing With Project volumes on Figures V.I-7 and V.I-8 were analyzed according to the CMA and HCM procedures previously discussed. These volumes were used to determine the impacts attributable to the Project relative to existing volumes.

As shown on Table V.I-3 the addition of Project volumes to existing volumes would slightly increase the study intersection V/C ratios and/or delay during one or both peak hours. However, utilizing LADOT’s significance thresholds shown on Table V.I-4, the Project would not result in any significant LOS impacts.



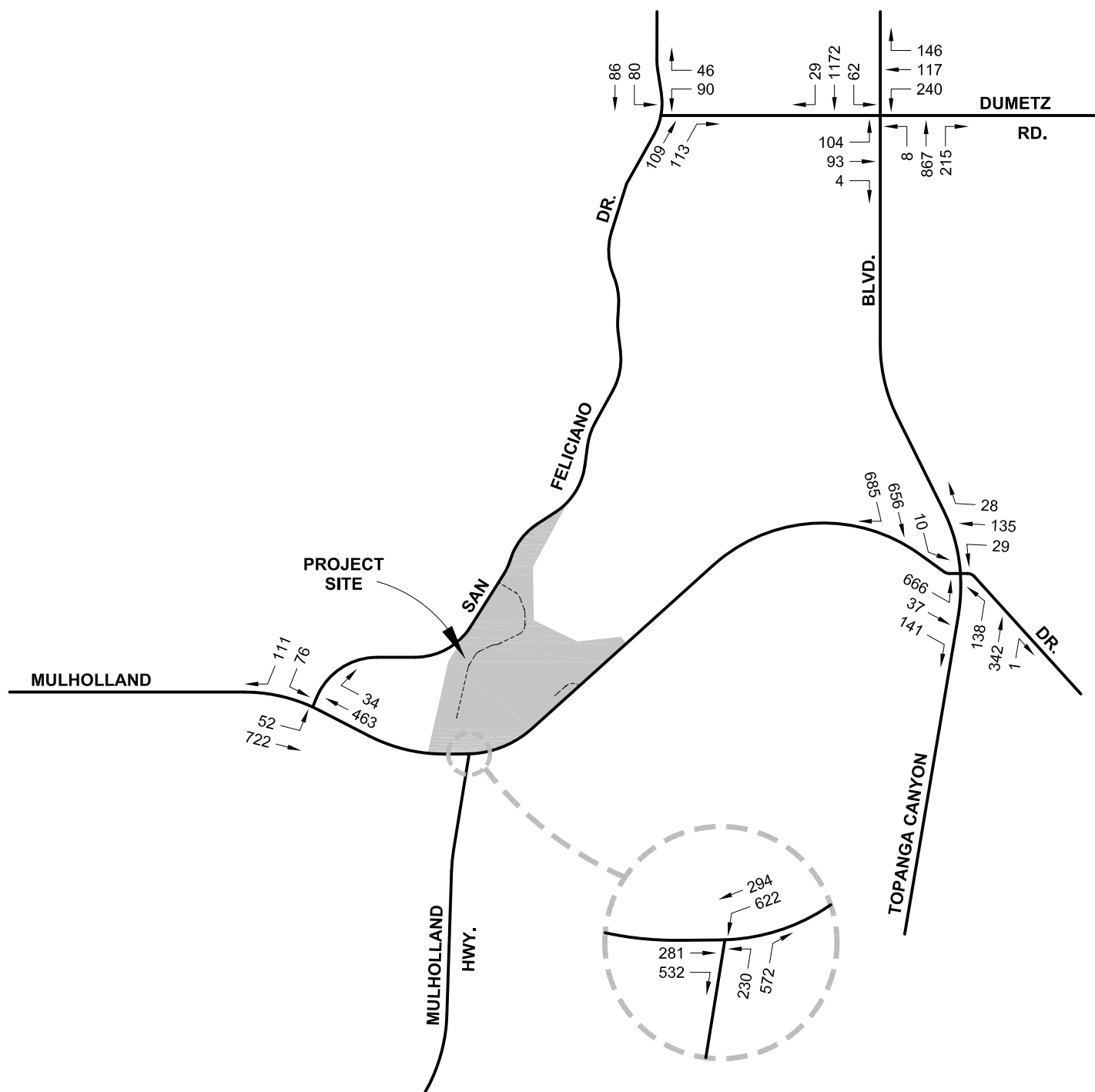
Source: Crain and Associates, 2015.





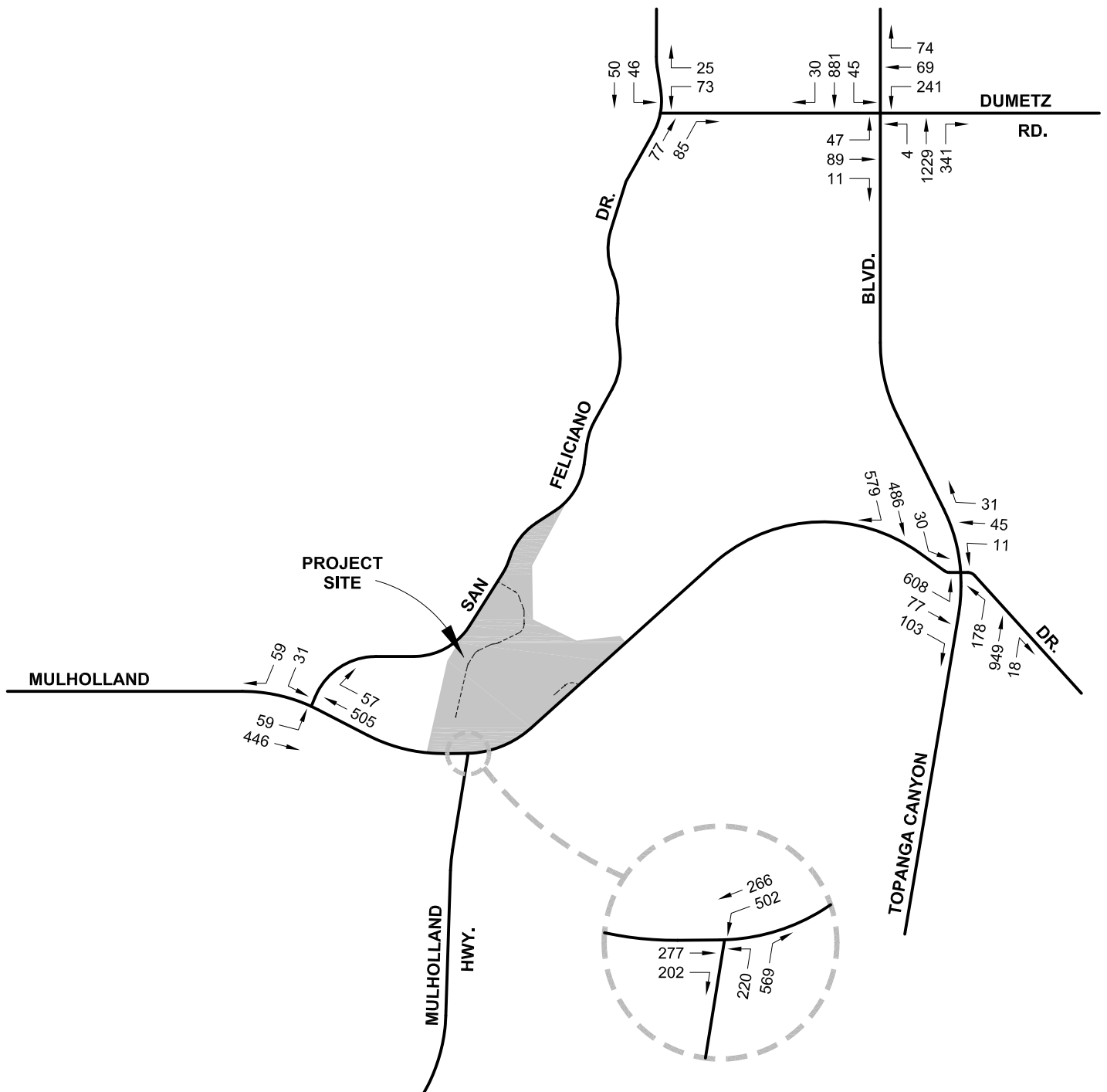
Source: Crain and Associates, 2015.





Source: Crain and Associates, 2015.





Source: Crain and Associates, 2015.



CMP Analysis

Arterial and Freeway Monitoring Locations Analyses

The traffic impact guidelines of the 2010 Congestion Management Program (CMP) for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed. Considering that the largest Project peak-hour trip generation, 19 trips during the PM peak hour, is well under these thresholds, no further CMP arterial or freeway analysis is warranted, and no significant impacts would occur.

Public Transit

Per the CMP guidelines and criteria, it is estimated that up to eight Project person-trips per day may use bus transit, including one person-trip during the AM and PM peak hours. It is expected that this minor addition of Project person-trips to bus transit would have negligible effect on transit capacity, and would not result in a significant impact.

Project Access

A cul-de-sac new public street, extending southerly into the Project Site from San Feliciano Drive, would provide vehicular access for 11 of the 19 homes. Four homes would have direct driveway access on San Feliciano Drive. A private driveway, extending northwesterly into the site from Mulholland Drive, would serve the four remaining homes. A deceleration lane and an acceleration lane on Mulholland Drive would also facilitate entry to and exit from this private driveway. There would be no internal vehicular connection between the new public street and Mulholland Drive.

The new public street would intersect a straight section of San Feliciano Drive. The speed limit on San Feliciano Drive is 25 miles per hour (MPH). Assuming a design speed of 35 MPH for San Feliciano Drive, i.e., 10 MPH higher than the 25 MPH speed limit, the current Caltrans Design Manual, 6th Edition indicates a stopping sight distance of 250 feet for a 35 MPH design speed. Stopping sight distance is the distance required by the driver of a vehicle, traveling at a given speed, to bring the vehicle to a stop after an object on the roadway becomes visible. In this case, the object would be either a vehicle on San Feliciano Drive proceeding toward the new public street intersection or a vehicle on the new public street waiting to turn onto San Feliciano Drive. Based on measurements on the Project tract map, it is estimated that a stopping sight distance of 250 feet would be provided for either vehicle at this new public street location.

The private driveway off of Mulholland Drive would also intersect a straight section of this street. Mulholland Drive has a posted speed limit of 35 MPH. Assuming a design speed of 45 MPH for Mulholland Drive, i.e., 10 MPH higher than the 35 MPH speed limit, the stopping sight distance is 360 feet according to the Caltrans Design Manual. Based on measurements on the Project tract map, it is

estimated that a 360-foot stopping sight distance would be provided at this private driveway location for both a vehicle on Mulholland Drive and a vehicle on the private driveway waiting to turn onto Mulholland Drive. The sight distance visibility would also be enhanced by the setbacks resulting from the proposed deceleration and acceleration lanes on Mulholland Drive. For these reasons, Project impacts related to access would be less than significant.

Parking

In compliance with the standard parking requirements of the Los Angeles Municipal Code (LAMC), the Project would be providing two covered parking spaces per dwelling unit, for a total of 38 covered parking spaces for the 19 single-family homes. Public parking on the proposed public street, plus spaces in private driveways would accommodate parking for guests and visitors. Therefore, no parking impacts would occur.

Construction Traffic

Project construction activities have the potential to cause (1) temporary traffic impacts on motorists; (2) temporary loss of access for visitors entering or leaving; (3) temporary loss of bus stops or rerouting of bus lines; and (4) temporary loss of on-street parking. Traffic impacts from construction would be expected to occur as a result of the following conditions:

- Increases in truck traffic associated with export or import of fill materials and delivery of construction materials;
- Decreased capacity of access streets and haul routes due to slower movements and larger turning radii of trucks;
- Increases in automobile traffic associated with construction workers traveling to and from the Project Site;
- Reductions in existing street capacity or on-street parking from temporary lane closures necessary for the construction of roadway improvements, utility relocation or extension, and drainage facilities;
- Blockage of existing vehicle or pedestrian access to other parcels fronting streets; and
- Loss of bus stops or rerouting of bus lines.

Project construction is expected to take approximately 14 months, from clearing and grading of the site to the end of building construction. Construction activity would occur on weekdays and occasionally on Saturdays.

No dirt or excavated materials would be exported from the Project Site. At the end of Project construction, approximately 4,200 cubic yards of dirt would be imported to the site to provide fill material. It is estimated that this activity would take approximately four days, with an average of approximately 75 inbound and 75 outbound haul truck trips per day. The haul route used would comply with the approved truck routes designated within the City. Project construction would also require delivery of construction materials. It is estimated that an average of six delivery truck trips per weekday would occur (three inbound, three outbound). No deliveries are planned on Saturday.

Construction worker traffic impacts would depend on the number of construction workers employed during various construction phases, as well as the travel mode and travel time of the workers. It is estimated that the maximum number of construction personnel per day during any phase of construction would be 37 people. Assuming some level of carpooling among these personnel, and assuming an average vehicle ridership of 1.135 persons per vehicle, there would be a maximum of 66 construction personnel trips per day (33 inbound, 33 outbound).

During the weekday, nearly all construction-related trips would occur outside of the peak hours. In general, the hours of construction typically require workers to be on-site before the weekday morning commuter peak period and allow them to leave before the afternoon commuter peak period. Saturday construction activity would occur outside of the typical weekend midday peak period. Therefore, the large majority of construction worker trips would occur outside of the typical weekday commuter periods and weekend midday peak period.

Prior to the commencement of all construction activities, the City requires project developers to prepare a Construction Traffic Management Plan (CTMP) that is required to be implemented during the construction phase, and which includes street closure information, detour plans, haul routes, and staging plans and formalizes how construction would be carried out and identifies specific actions that would be required to reduce effects on the surrounding community. The CTMP is required to be implemented during the construction phase. The CTMP is based on the nature and timing of the specific construction activities and other projects in the project vicinity and would include the following elements, as appropriate:

- Providing for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag men);
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Rerouting construction trucks to reduce travel on congested streets to the extent feasible;
- Prohibiting construction-related vehicles from parking on surrounding public streets;
- Providing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;

- Accommodating all equipment on-site;
- Scheduling of construction-related deliveries to reduce travel during commuter peak hours; and
- Obtaining the required permits for the truck haul routes from the City prior to issuance of any permit for the Project.

The CTMP for the Project would prohibit construction-related vehicles and construction workers from parking on surrounding public streets. Adequate parking for construction workers would be provided at a designated on-site or off-site location. Thus, construction workers and vehicles would not reduce the availability of spaces on streets surrounding the Project Site. Also, no bus stops would be relocated and no bus lines would be rerouted due to Project construction.

Construction of the Project would be largely contained within the Project Site and would not affect adjacent street access. In addition, any delays from additional construction traffic and/or construction activities at locations other than the streets adjacent to the Project Site would not be substantial. Certain construction activities such as roadway improvements, utility relocation or extension, and drainage facility reconstruction could require temporary lane closures, which would in turn temporarily reduce existing street capacity, but such impacts would be short-term in duration.

With the implementation of safety procedures and other controls set forth in the required CTMP, construction would not create hazards for roadway travelers or bus riders. The impacts of construction activity on the overall transportation system would be temporary in nature and would cause minimal interruption to the regular operation of the facilities surrounding the Project site. Impacts on traffic associated with construction (e.g., an intermittent reduction in street and intersection operating capacity) are typically considered short-term impacts, but not significant. Therefore, Project construction-traffic impacts would be less than significant.

CUMULATIVE IMPACTS

Existing traffic is forecast to increase due to traffic growth from two sources. One source is the ambient growth in traffic, which reflects increases in traffic due to regional growth and development outside the study area. The other source is traffic attributable to projects in the vicinity of the study area that are proposed, approved or under construction, commonly referred to as “cumulative projects.” However, as discussed below, no cumulative projects were identified at the time the Project Traffic Study was prepared and approved by LADOT. As such, the traffic volume increases from ambient traffic growth provided the basis for the analysis of the “Future Without Project” condition. Project traffic was then analyzed as an incremental addition to the Future Without Project traffic volumes, forming the traffic volumes for the “Future With Project” condition.

Ambient Traffic Growth

As determined in consultation with LADOT, an ambient growth factor of 2.0 percent per year was applied to the existing (2015) traffic volumes to reflect the effects of regional growth and development over a three-year period through the future study year 2018, the anticipated Project completion year. This growth factoring established the future baseline volumes for the analysis.

Cumulative Projects Traffic

The traffic study also considered the impacts of the Project relative to other cumulative development projects in the study area that might contribute significant traffic volumes to the study intersections through the year 2018. In consultation with LADOT, the City of Calabasas, and the County of Los Angeles, no such cumulative development projects in these jurisdictions were on file within a 1.5-mile radius of the Project Site at the time the Project Traffic Study was prepared and approved by LADOT in June 2015. Thus, no additional traffic growth from specific development projects in the study area was factored into the traffic study for the Proposed Project.

Subsequently, in July 2015, an application for a 330-unit residential development at 22055-22147 Clarendon Street in the City of Los Angeles was filed. This project would replace an existing post office and office building with a five-story apartment complex adjacent to the US 101 (Ventura) Freeway, just west of Topanga Canyon Boulevard (State Route 27). This site is located about 1.3 miles north of the Proposed Project location. After review of this cumulative project and the existing traffic generation by the uses at the site, it was concluded that the ambient traffic growth rate of 2.0 percent per year (or 8 percent, compounded over the buildout horizon for the Project) applied in the Project Traffic Study would be more than sufficient to account for the relatively small number of vehicle trips generated by this cumulative project that would likely be passing through the same intersections as Project traffic. Therefore, no adjustments to the Project Traffic Study were deemed necessary.

Highway System Improvements

As previously discussed, all of the signalized study intersections are operating under ATSAC/ATCS. The intersection capacity improvement attributable to ATSAC/ATCS has been incorporated into the analysis of existing and future conditions. The analysis of future conditions included a review of the City of Los Angeles Bureau of Engineering “Uniform Project Reporting System” website and the City of Calabasas Planning Division website for potential street improvements that could affect study intersection operations. Based on this review, the only highway improvements slated to occur in the study area would be under the Mulholland Highway Scenic Operations Improvement Project, Phase III. This project includes improvements to the intersection of Mulholland Drive and Mulholland Highway. However, these improvements would not change the lane configurations or signal phasing of the intersection. Thus, the future analysis of this intersection would not be affected.

Analysis of Future Traffic Conditions, Without and With Project

The analysis of traffic conditions at the study intersections for the future study year of 2018 was performed using the analysis procedures previously described. The current traffic lane configurations and signal operations at the study intersections were assumed to remain the same. Traffic volumes for the Future Without Project condition are shown on Figures V.I-9 and V.I-10. These volumes include only ambient traffic growth increases per the previous discussion.

Project traffic volumes, as described earlier, were added to the above Future Without Project volumes, producing the Future With Project volumes, which are provided on Figures V.I-11 and V.I-12. The Future With Project volumes were the basis for calculating the traffic impacts attributable to the Project, relative to the Future Without Project volumes.

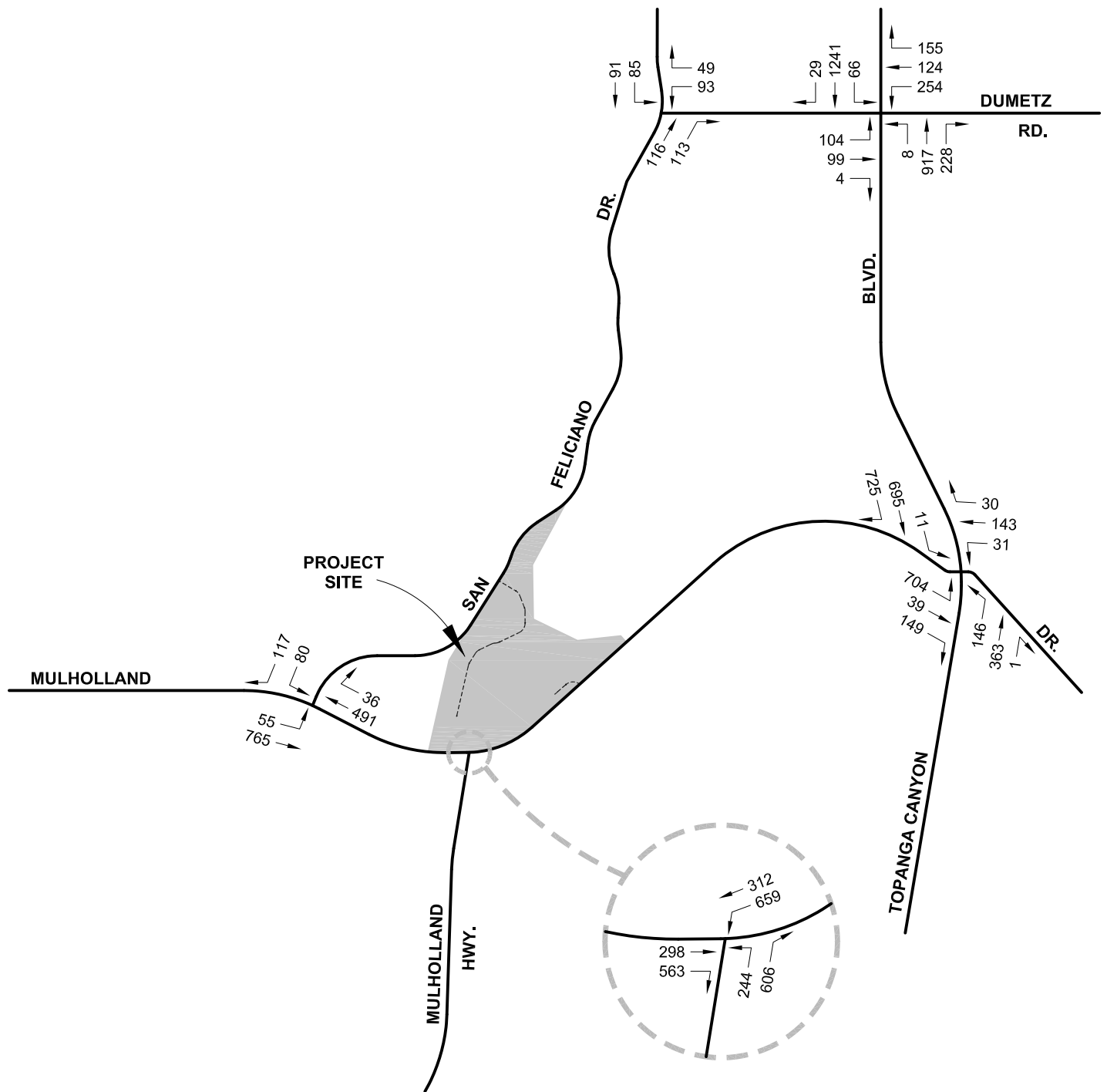
The results of the Future conditions analysis are presented in Table V.I-3. As shown, service levels are forecast to worsen at some intersections. Under Future Without Project conditions, the intersections of Mulholland Drive and San Feliciano Drive and Mulholland Drive and Mulholland Highway would be operating at LOS D during one or both peak hours. At the intersection of Mulholland Drive and Topanga Canyon Boulevard, the LOS would change from A to B during the AM peak hour. However, based on LADOT's significance criteria shown on Table V.I-4, no significant impacts attributable to Project generated traffic would occur under the Future With Project condition.

MITIGATION MEASURES

Because no significant traffic impacts have been identified, no mitigation measures are required.

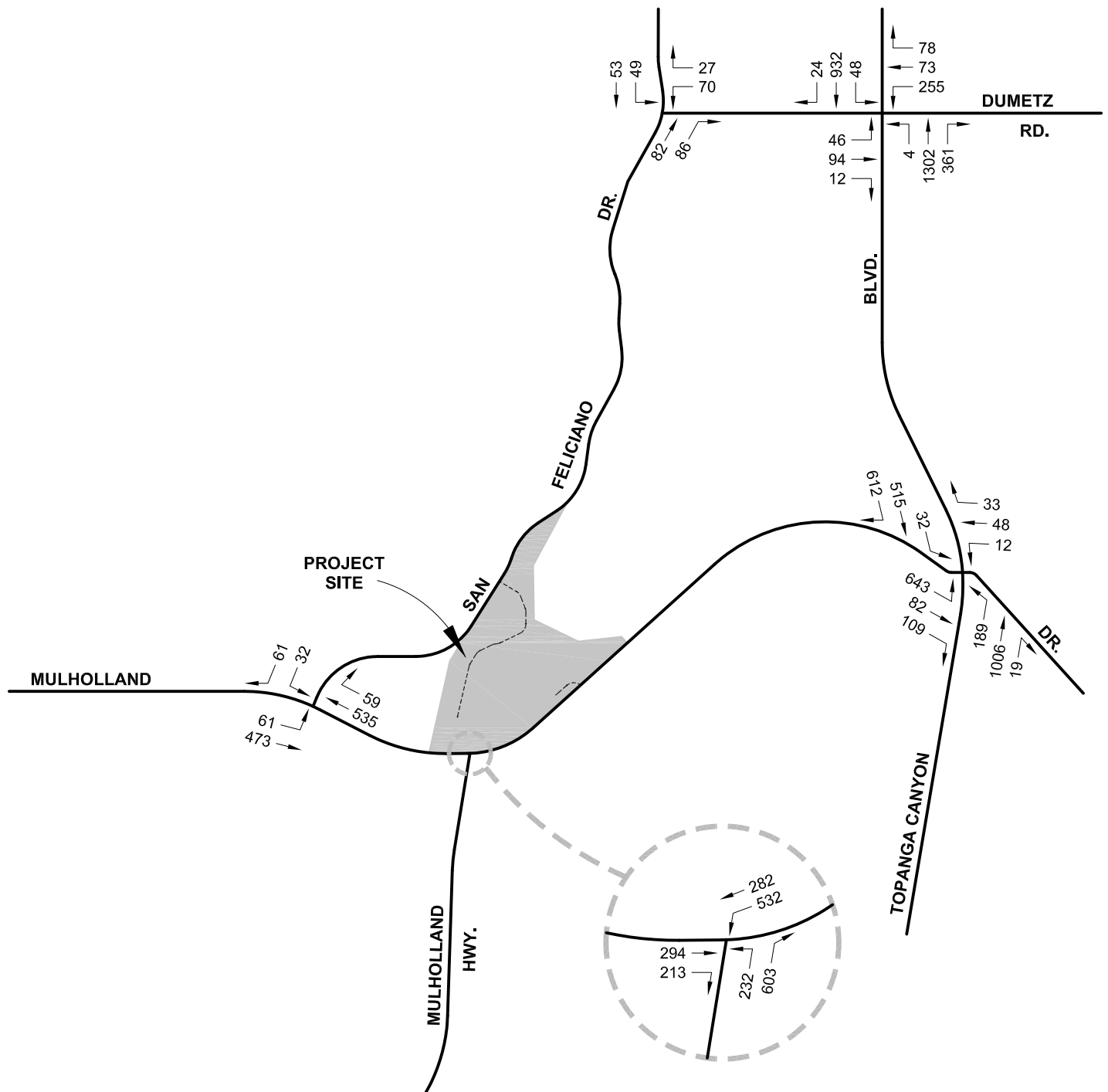
LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to traffic would be less than significant.



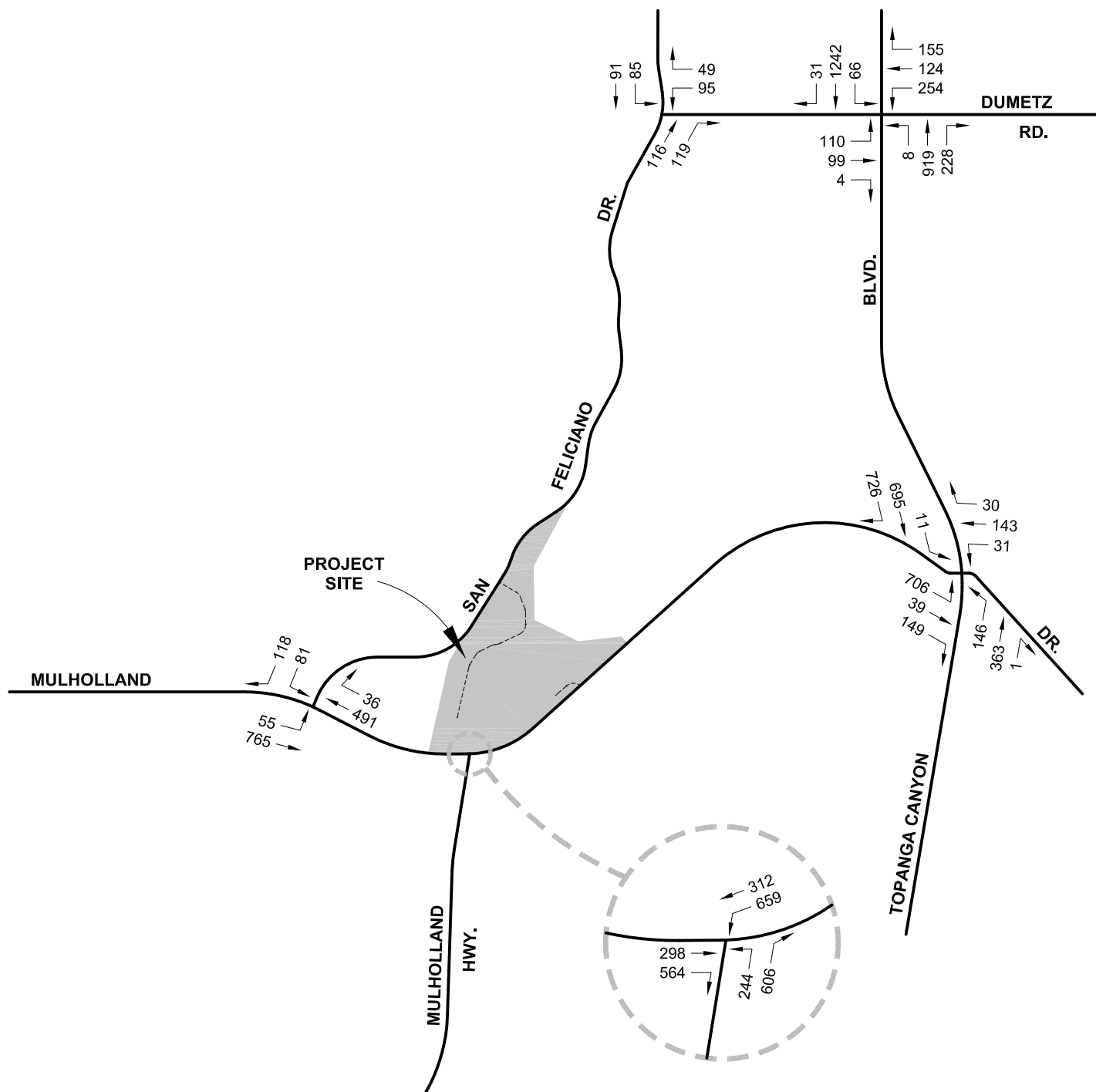
Source: Crain and Associates, 2015.





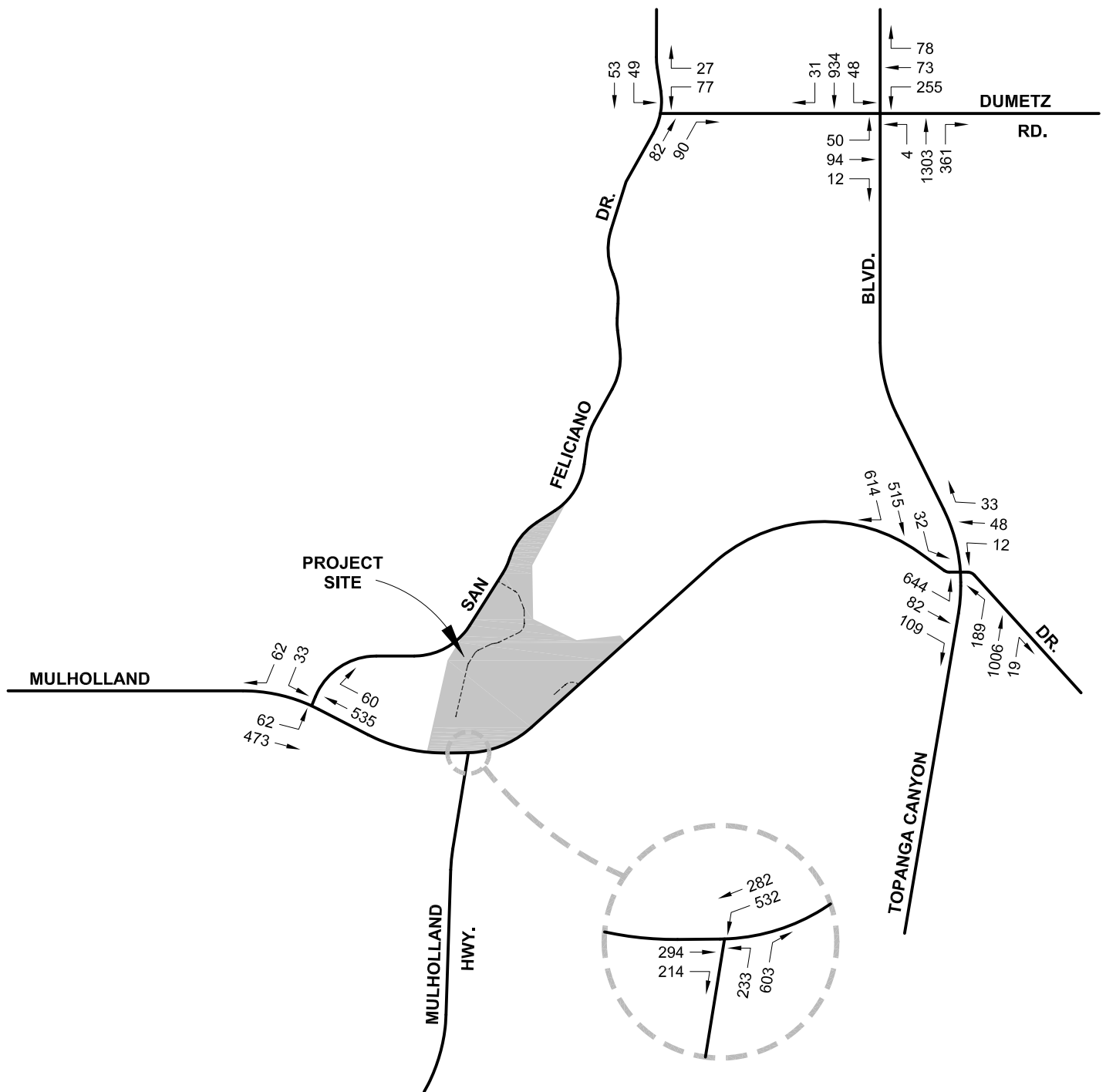
Source: Crain and Associates, 2015.





Source: Crain and Associates, 2015.





Source: Crain and Associates, 2015.



VI. GENERAL IMPACT CATEGORIES

A. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided. Specifically, Section 15126.2(b) states:

Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Based on the analysis contained in Section V (Environmental Impact Analysis) of this Draft EIR, the Proposed Project would not result in any significant unavoidable environmental impacts, nor would it combine with other development in the general vicinity to contribute to any significant unavoidable cumulative environmental impacts.

B. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the State CEQA Guidelines states that the “uses of nonrenewable resources during the initial and continued phases of the Project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.” Section 15126.2(c) further states that “irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The types and level of development associated with the Proposed Project would consume limited, slowly renewable and non-renewable resources. This consumption would occur during construction of the Proposed Project and would continue throughout its operational lifetime. The development of the Proposed Project would require a commitment of resources that would include (1) building materials, (2) fuel and operational materials/resources and (3) the transportation of goods and people to and from the Project Site.

Demolition of the structures on the site would result in production of waste material. However the Proposed Project would recycle and salvage construction soil export and debris including concrete, asphalt, wood, drywall, metals and other miscellaneous and composite materials. Proper separation of demolition debris would assist environmental clean up and allow for the proper disposal of hazardous materials that may be found within existing buildings. On March 5, 2010, the City Council approved Council File 09-3029 pertaining to a Citywide Construction and Demolition (C&D) Debris Recycling Ordinance that requires all mixed C&D waste generated within City limits be taken to City certified C&D waste processors. The Bureau of Sanitation (BOS) is responsible for this C&D waste recycling policy. The ordinance requires that all haulers and contractors responsible for handling C&D waste must obtain a

Private Solid Waste Hauler Permit from BOS prior to collecting, hauling and transporting C&D waste and C&D waste can only be taken to City Certified C&D Processing Facilities.¹ While no specific goals or targets are outlined, some of the facilities that reuse or recycle C&D waste reach 100 percent.²

Construction of the Proposed Project would require consumption of resources that are not replenishable or which may renew slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics) and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the Proposed Project. However, this resource consumption would be consistent with growth and anticipated change in the Los Angeles region.

C. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

Section 15126.2(d) of the State CEQA Guidelines requires a discussion of the ways in which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 12126.2(d) of the State CEQA Guidelines states:

Discuss the ways in which the Proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Growth-Inducing Potential

¹ City of Los Angeles Department of Sanitation website: http://lacitysan.org/solid_resources/recycling/c&d.htm, accessed June 13, 2015.

² City of Los Angeles, Construction and Demolition Recycling Guide website: http://lacitysan.org/solid_resources/pdfs/C&D_guide.pdf, accessed June 13, 2015.

In general terms, a project may foster or encourage population growth in a geographic area if it meets any of the criteria identified below:

- Economic expansion or growth (e.g., changes in revenue base, employment expansion, etc.);
- Removal of an impediment to growth (e.g., establishment of an essential public service or the provision of new access to an area);
- Establishment of a precedent-setting action (e.g., an innovation, a change in zoning, or general plan amendment approval); or
- Development of or encroachment on an isolated or adjacent area of open space (being distinct from an “infill” type of project).

The Proposed Project could foster economic growth by increasing the number of residents at the Project Site who could patronize local businesses and services in the area. In addition, employment opportunities would be provided during the construction and operation of the Proposed Project. However, as the Proposed Project involves the construction of only 19 detached, single-family homes, this growth would be consistent with area-wide population and housing forecasts.

The roadways and other infrastructure (e.g., water facilities, electricity transmission lines, natural gas lines, etc.) associated with the Proposed Project would not induce growth because they are existing and they would only serve Proposed Project residents. Also, as the Proposed Project is surrounded by existing development, it would not stimulate further growth by extending roads into previously inaccessible and undeveloped areas.

VII. ALTERNATIVES

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

ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6(a) of the *CEQA Guidelines* states:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Purpose

Section 15126.6(b) of the *CEQA Guidelines* states:

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

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the *CEQA Guidelines* states:

The range of potential alternatives to the Proposed Project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also

identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

Level of Detail

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

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

PROJECT OBJECTIVES

The Project Applicant's objectives for the Proposed Project are as follows:

- To create a new residential community of 19 single-family homes without displacing existing housing.
- To help alleviate the current housing shortage by providing infill residential development on underutilized land.
- To provide housing in close proximity to commercial areas and recreational areas.
- To design the on-site circulation system to help ensure safe ingress and egress to and from the Project Site for existing and future area residents, and other motorists.
- To design a project that is consistent with the predominant character of the style of the neighborhood and that connects with the surrounding suburban environment and reflects neighborhood and market needs.
- To design landscape features that provide natural character and texture within the neighborhood suburban environment; that enhance the visual character of the development.
- To allow development of the site while minimizing tree removal and landform alteration.

OVERVIEW OF SELECTED ALTERNATIVES

- Alternative 1 - No Project (No Construction)
- Alternative 2 – Park Alternative

Alternatives Eliminated from Detailed Consideration

In addition to specifying that the EIR evaluate “a range of reasonable alternatives” to the Proposed Project, Section 15126.6(c) of the *CEQA Guidelines* requires that an EIR identify any alternatives that were considered but were rejected and the rationale for their rejection.

In the Draft EIR for the Original Project, a 37-unit single-family condominium development, three alternatives were evaluated: (1) no project, (2) a reduced density 29-unit detached single-family home development, and (3) a park alternative. The current Proposed Project consists of a 19-unit detached single-family home development, which is substantially reduced from the reduced density alternative that was evaluated in the 2007 Draft EIR. For this reason, as well as concerns regarding the potential economic viability of a smaller development and the lack of significant and unavoidable environmental impacts resulting from the Proposed Project, a further reduced density alternative is not included in this Draft EIR.

Given that the Project Site is surrounded primarily by single-family residential uses and is currently zoned and designated for such uses in the General Plan, no alternative development including commercial, retail, or other non-residential uses is included in this Draft EIR. As is noted in Section VI (General Impact Categories) of this Draft EIR, the Proposed Project would not result in any unavoidable significant impacts. The significant impacts of the Project in the areas of aesthetics, air quality, biological resources, and noise would be reduced to less than significant levels via the implementation of the mitigation measures identified in this Draft EIR. Because any economically feasible development of the Project Site would likely also result in adverse impacts associated with these same environmental issue areas, the only alternative that would be certain to reduce such impacts is one that does not include development of the site.

No alternative location for the Proposed Project was evaluated as no such sites are currently owned by the Project Applicant.

EVALUATION OF ALTERNATIVES

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

Alternative 1: No Project

As required by CEQA, a No Project Alternative was analyzed. Under the No Project Alternative, the Proposed Project would not be constructed and the Project Site would remain undeveloped. The analysis of the No Project Alternative assumes the continuation of existing conditions. The potential environmental impacts associated with the No Project Alternative are described below and are compared to the potential environmental impacts associated with the Proposed Project.

Section 15126.6(e)(2) of the *CEQA Guidelines* states that the No Project Alternative “...analysis shall discuss the existing conditions at the time the notice of preparation is published . . . as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” Furthermore, Section 15126.6(e)(3)(B) of the *CEQA Guidelines* states: “If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed. In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.”

Under Alternative 1: No Project (No Construction), it is assumed that no development within the subject property would occur.

Relationship to Project Objectives

As proposed, Alternative 1 would not satisfy any of the Project objectives listed above.

Environmental Impacts***Aesthetics***

Under this alternative, no new construction or physical modifications would occur on the Project Site, and the existing vacant two-story single-family residence, sheds and aged kennel occupying the Project Site would remain. No oak, black walnut or non-native landscape trees would be removed from the Project Site. No homes would be built that might encroach into the viewshed of the Mulholland Scenic Parkway. No views of the on-site oak woodland would be obstructed. No retaining walls would be constructed. No new sources of night lighting would be added.

The existing low retaining wall on San Feliciano Drive would remain as an unattractive feature of the Project Site, as would the aging and unsightly chain link fencing that surrounds the property. The weedy growth along San Feliciano Drive would also remain. Furthermore, the unsightly overhead utility lines

would remain in their current location and would not be placed underground. The existing home, sheds and kennel would continue to deteriorate and the property would remain open for trespassers. Lastly, the Project Site would remain a haven for nuisance wildlife species such as rats and possums.

In balance, under the No Project Alternative, aesthetic impacts would be less than significant compared to the Proposed Project's potentially significant impacts.

Air Quality

As the site would remain unoccupied, no new air quality emissions associated with demolition, grading or construction would occur. The existing buildings on-site are abandoned and unlikely to be re-occupied, therefore no vehicle trips would be generated under this Alternative and operational air quality impacts would also be less than significant. Consequently, air quality impacts would be less than significant and less than the Proposed Project's potentially significant impacts.

Biological Resources

Under this alternative, no new construction or physical modifications would occur on the Project Site, including tree and vegetation removal and grading. Therefore, no impacts would occur to special status species that occur, or have the potential to occur, on-site. Although some special status species may be currently affected by human uses adjacent to the site (i.e., noise disturbance from traffic or residential activities, domestic pet predation), these impacts are considerably less under this alternative than under the Proposed Project. Also, under this alternative, no protected trees or sensitive plant communities would be removed or adversely impacted.

Greenhouse Gas Emissions

Because no development of the Project Site would occur under this alternative, no new greenhouse gas emissions would be generated at the site. The existing buildings on-site are abandoned and unlikely to be re-occupied, therefore no vehicle trips would be generated under this alternative. Consequently, greenhouse gas emission impacts would be less than significant and less than the Proposed Project's less than significant impacts.

Hazards

Although the potential exists for the existing single-family home on-site to contain asbestos containing materials (ACMs) or lead-based paint, this building would not be demolished under this alternative. If for any reason in the future it were demolished, it would be subject to the same EPA and SCAQMD regulations which specify that ACMs and lead-based paint must be removed by a trained and licensed asbestos abatement and/or lead-based paint abatement contractor and disposed of as hazardous waste in accordance with all applicable rules and regulations.

As no development would occur on-site, there would be no potential for the accidental rupture or damage to the crude oil pipelines in the shoulder of Mulholland Drive. Therefore, hazardous materials impacts would be less than significant and less than the Proposed Project's potentially significant impacts.

Land Use

Under the No Project Alternative, there would be no request for any of the following: Vesting Tentative Tract Map approval; Zoning Administrator Determinations (ZAD) to allow the proposed number and height of retaining walls; a Protected Tree Removal/Relocation Permit to authorize the removal of 15 oak trees; Advisory Agency approval; approval under the Mulholland Scenic Parkway Specific Plan; or any other necessary permits or approvals as may be necessary to construct the Proposed Project (including haul route approval).

Neither the Proposed Project nor the No Project Alternative would physically divide an established community. As there would be no construction, the No Project Alternative would not be determined to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. In comparison, while the analyses indicate that the Proposed Project could be found to be consistent with the provisions of the Mulholland Scenic Parkway Specific Plan, such a determination must be made by the decision-making bodies. Lastly, as there are no habitat conservation plans or community conservation plans that are applicable to the Project Site, neither the No Project Alternative nor the Proposed Project would conflict with such plans.

While the Proposed Project would have less than significant land use impacts, the No Project Alternative would have no land use impacts.

Noise

Under this alternative, no demolition, grading or construction would occur on-site, therefore no short-term construction noise or vibration impacts would occur. In comparison, the Proposed Project would create significant construction-related noise impacts prior to the application of required mitigation. With respect to operational noise, under this alternative, the site would remain undeveloped and vacant. It is unlikely that the existing single-family residence on-site would be re-occupied and therefore no operational noise impacts would occur. While the operational noise impacts under the Proposed Project would be less than significant, there would be no noise impact from the No Project Alternative.

Traffic

As the site would remain undeveloped and the existing buildings on-site are unlikely to be re-occupied, no vehicle trips would be generated under this alternative. While the traffic impacts associated with the Proposed Project would be less than significant, there would be no traffic impact under the No Project

Alternative.

Alternative 2: Park Alternative

Under this alternative, the 6.2-acre Project Site would be acquired by a public agency and developed as a public park. According to the Santa Monica Mountains Conservancy, there is some possibility that the Conservancy, the Department of Recreation and Parks, or the Mountains Recreation and Conservation Authority (MRCA) could take over ownership and/or management of all but the northeastern one acre of the adjacent DWP's 5.91-acre Girard reservoir property.¹ If one of these agencies were also to acquire the Project Site, which abuts almost 50 percent of the Girard Reservoir perimeter, a public park of approximately 11 acres could be created by combining the two properties. It is noted that the Park Alternative does not meet the Project Applicant's objectives. However, it is included in this discussion in responses to requests from the community for its assessment.

Because of the scenic value of the oak woodland adjacent to the Mulholland Drive Scenic Parkway, such a park would most likely not be developed for active recreation, but rather would be utilized as a wildlife refuge and for such passive recreational activities as hiking and bird watching. This alternative assumes that the extent of improvements on the Project Site's portion of the park would be limited to the demolition of the existing house, sheds, kennels and hardscape features, the removal of the surrounding chain-link fencing, the removal of non-native landscaping, and the subsequent restoration of the native habitat. While no new structures would be built on the park property, it is reasonable to assume that some landform alteration would occur on-site to provide access and parking. This alternative assumes that a graded and paved parking area would be located in the southwestern corner of the Project Site where the terrain is most level. Access would then be provided by a driveway on San Feliciano Drive. Like other small parks in the general vicinity, it is assumed that this park would be unstaffed, unlocked, and open from dawn to dusk.

Relationship to Project Objectives

As proposed, Alternative 2 would not fully satisfy any of the Project objectives listed above, although it would preserve the site's natural character and texture within the neighborhood suburban environment.

¹ Correspondence from Elizabeth A. Cheadle, Chairperson, Santa Monica Mountains Conservancy to Jonathon Riker, Environmental Review Section, Los Angeles City Planning Department, December 5, 2005.

Environmental Impacts

Aesthetics

Under the Park alternative, no new construction of structures visible within the protected viewshed of the Mulholland Drive Scenic Parkway would occur on the Project Site, although the existing single-family residence and associated sheds and aged kennel would be demolished. Also, the non-native trees and shrubs would also be removed and the native habitat would be restored. No oak, black walnut or other native trees or shrubs would be removed from the Project Site. No views of the on-site oak woodland would be obstructed. No retaining walls would be constructed and no new sources of night lighting would be added. Consequently, the most prominent features that currently detract from the aesthetic qualities of the Project Site would be removed, while no new features would be constructed.

It is likely that under the Park Alternative, the existing low retaining wall on San Feliciano Drive would remain as an unattractive feature of the Project Site although the unsightly chain link fencing that surrounds the property would be dismantled to improve access and to remove barriers to wildlife movement. It is expected that, as part of the habitat restoration efforts, the weedy growth along San Feliciano Drive would also be removed. However, the unsightly overhead utility lines would likely remain in their current location and would not be placed underground.

On balance, the Park Alternative would eliminate the significant aesthetic impact associated with the Proposed Project and would enhance the aesthetic values of the Project Site. Impacts would be less than significant.

Air Quality

Under this alternative, demolition of the on-site structures and some small amount of grading and landscaping may occur. While the demolition activities and the resultant emissions would be the same under the Proposed Project and the Park Alternative, there would be substantially less grading and practically no construction-related emissions under the Park Alternative. While the Proposed Project's construction-related air quality impacts would be less than significant with mitigation, the construction-related impacts under the Park Alternative would be less than significant and substantially less than that associated with the Proposed Project.

The Park Alternative would generate fewer daily vehicle trips than the Proposed Project (34 trips versus 181 trips), and would thus result in substantially lower vehicle emissions. While the Proposed Project's operational air quality impacts would be less than significant, the operational air quality impacts under the Park Alternative would be less than that associated with the Proposed Project.

Biological Resources

Under this alternative, no new construction of large structures or paved roadways would occur on the Project Site, including tree and vegetation removal and grading. Limited construction of auxiliary park features (i.e., restrooms, trails, fences) and removal of non-native vegetation may occur as part of park development and maintenance, which may result in temporary impacts to special status species; however, these impacts would be very limited and of a lower magnitude than the impacts associated with the Proposed Project. In addition, the long-term benefits of the habitat protection and enhancement would result in overall beneficial impacts to special status species and common plant and animal species. Also, under this alternative, it is likely that no protected trees or sensitive plant communities would be removed or adversely impacted.

Greenhouse Gas Emissions

Under this alternative, demolition of the on-site structures and some small amount of grading and landscaping may occur. While the demolition activities and the resultant emissions would be the same under the Proposed Project and the Park Alternative, there would be substantially less grading and practically no construction-related greenhouse gas emissions under the Park Alternative. The Park Alternative would generate fewer daily vehicle trips than the Proposed Project (34 trips versus 181 trips), and would thus result in substantially lower vehicle emissions, which contribute to greenhouse gases. While the Proposed Project's greenhouse gas emissions would be less than significant, the greenhouse gas emission impacts under the Park Alternative would be less than that associated with the Proposed Project.

Hazards

As for the Proposed Project, under this alternative, demolition of the existing on-site structures would occur. There is the potential that these structures contain ACMs and/or lead-based paint, the release of which into the environment could result in significant adverse health affects. However, demolition activities under either the Proposed Project or the Park Alternative would be subject to applicable laws and regulations to ensure safe and proper removal and disposal of these materials. With adherence to these regulations, no significant impacts would result from ACM or lead-based paint removal and impacts would be the same as with the Proposed Project.

Because vehicular access to the Park's parking area would be from San Feliciano Drive and not from Mulholland Drive, the Park alternative would have less potential for the accidental rupture of the oil pipelines located in the Mulholland Drive right-of-way. Furthermore, standard operating procedures for construction in the vicinity of known pipelines, generally consisting of notification and marking requirements, including but not limited to contacting of Underground Service Alert of Southern California (Dig Alert) a minimum of two full working days (48 hours) prior to the commencement of earthmoving activities would still be followed, ensuring impacts are kept to less than significant levels. Therefore, hazardous materials impacts would be slightly less than the Proposed Project's impacts, but would remain

potentially significant.

Land Use

Neither the Proposed Project nor the Park Alternative would place a barrier between existing land uses or prevent free movement along existing north-south or east-west corridors. Therefore, neither the Proposed Project nor the Park Alternative would physically divide any established communities, and there would be no impact under either. The development of a park on the Project Site would be compatible with the existing R1 zoning and the Low Residential land use designation. Also, a park on the Project Site would be more compatible than a residential development with the Mulholland Drive Scenic Parkway Specific Plan's intended purpose of preserving the aesthetic qualities of the scenic parkway. Therefore, under the Park Alternative there would be less potential conflict with the Specific Plan. As there are no habitat conservation plans or community conservation plans that are applicable to the Project Site, neither the Proposed Project nor the Park Alternative would conflict with any habitat conservation plan or community conservation plan and there would be no impact.

Noise

Under this alternative, demolition of the on-site structures and some small amount of grading and landscaping may occur. However, the grading associated with the Park Alternative would be substantially less than that needed for the Proposed Project and, therefore, noise impacts would be less than with the Proposed Project. For operational noise impacts, no residences would be located on-site, therefore, no impacts related to rooftop heating, ventilation and air conditioning (HVAC) systems would occur. A small park would generate fewer operational vehicle trips than the Proposed Project and, therefore, noise impacts associated with vehicle trips would be less than significant under this alternative and less than the Proposed Project's less than significant operational vehicle noise impacts. The Proposed Project's noise impacts would be less than significant with mitigation for the construction period and less than significant for the operation period. The Park Alternative's noise impacts would be less than significant and less than those of the Proposed Project for both periods.

Traffic

Under the Park Alternative, approximately 34 daily vehicle trips would be generated by visitors (approximately 0 AM peak hour trips and 1 PM peak hour trip; see Table VII-1). In comparison, the Proposed Project would generate approximately 181 total daily vehicle trips, including 14 trips during the AM peak hour and 19 trips during the PM peak hour. Traffic impacts under the Proposed Project would be less than significant. The Park Alternative would generate less traffic and therefore would further reduce the traffic impact.

Table VII-1
Traffic Generation Comparison: Park Alternative

Project	Daily Trips	AM Peak-Hour Trips		PM Peak-Hour Trips	
		In	Out	In	Out
Park Alternative	34	0	0	0	1
Proposed Project	181	4	10	12	7
<i>Source: Crain & Associates, February 2006 and April 2015.</i>					

Environmentally Superior Alternative

In general, the environmentally superior alternative, as defined by CEQA, should minimize adverse impacts to the Project Site and its surrounding environment. Of the alternatives considered, the "No Project Alternative" does not create any new impacts; therefore, it is environmentally superior to a project which proposes to change existing conditions. However, CEQA requires the identification of another "environmentally superior" alternative when the No Project Alternative is chosen. Alternative 2 – Park Alternative, involves less environmental disruption (less grading, less construction-related air quality and noise impacts, less intrusive visual quality impacts, fewer impacts to biological resources, fewer land use impacts and less potential for pipeline-related hazards). Consequently, as shown in Table VII-2, of the alternatives discussed in this EIR, the Park Alternative is the environmentally superior alternative. The Park Alternative, however, has been rejected by the Project Applicant because it fails to fully meet the Project objectives, there has been no commitment from the Department of Water and Power to release the 5.91-acre Girard Reservoir property for park purposes, and there has been no offer from any public agency or private organization to purchase the Project Site for park purposes.

Therefore, the Proposed Project can be considered the environmentally superior alternative because: (1) it allows for the logical development of the Project Site, utilizing the same property rights as other sites with the same zoning and in the same vicinity; (2) it minimizes grading and impacts to biological resources, including protected trees; (3) it preserves nearly one-half of the Project Site as natural open space; and (4) it would not create any significant and unavoidable environmental impacts.

**Table VII-2
Comparison of Proposed Project and Alternative Impacts**

Issue Area	Proposed Project	Alternative 1 No Project (No Construction)	Alternative 2 Park Alternative
Aesthetics	S	NS(-)	NS(-)
Air Quality			
Construction	S	NS(-)	NS(-)
Operations	NS	NS(-)	NS(-)
Biological Resources	S	NS(-)	NS(-)
Greenhouse Gas Emissions			
Construction	NS	NS(-)	NS(-)
Operations	NS	NS(-)	NS(-)
Hazards	S	NS(-)	NS(-)
Land Use	NS	NS(-)	NS(-)
Noise			
Construction	S	NS(-)	NS(-)
Operations	NS	NS(-)	NS(-)
Traffic	NS	NS(-)	NS(-)
Notes: <i>NS = Impacts would not be significant.</i> <i>S = Significant impacts prior to mitigation (all Proposed Project significant impacts can be mitigated to a less than significant level).</i> <i>(-) = Impacts would be less than the Proposed Project.</i> <i>(+) = Impacts would be greater than the Proposed Project.</i>			

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