IV. ENVIRONMENTAL IMPACT ANALYSIS

1. EIR IMPACT METHODOLOGY

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

2. ANALYSIS SECTION FORMAT

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

<u>Introduction</u> - provides a brief explanation of the "scope" of the analysis section and identifies key references used for the section analysis.

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

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

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

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

 $\underline{\text{Methodology}}$ – summarizes the methods, procedures and techniques used to estimate Project impacts.

<u>Thresholds of Significance</u> – identifies and explains the thresholds of significance and any additional criteria used to determine the significance of the Project's impacts.

Project Impacts – discusses the potential impacts of the Project.

<u>Cumulative Impacts</u> – discusses the extent to which the Project may create cumulative impacts.

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

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

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

Project Design Features

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

Compliance Measures

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

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

<u>Level of Significance After Mitigation</u> – provides a summary of the significance conclusions regarding the Project's impacts after implementation of all Mitigation Measures.

3. REFERENCES AND RESOURCES

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