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CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY	**COUNCIL DISTRICT**
City of Los Angeles	CD 12 - MITCHELL ENGLANDER
PROJECT TITLE	**CASE NO.**
ENV-2016-3175-MND	CPC-2016-3174-ZC, VTT-74478

PROJECT LOCATION
11000 N OLD SANTA SUSANA PASS ROAD

PROJECT DESCRIPTION
The Project Site is a generally level, irregularly-shaped parcel. The Site is primarily bounded by Calle Milagros to the south; Old Santa Susana Pass Road to the east; Farralone Avenue to the west; and the United Cerebral Palsy Center to the north. Bee Canyon Road bisects the Site and is used for local access by a few properties. The Project Site contains three occupied single-family homes, and several old, dilapidated accessory buildings, and vacant land. The Santa Susana Flood Channel (LA County Flood Control) cuts across the Site and there is a concrete reinforced bridge connecting the two sides. There is an existing easement and existing concrete bridge over the channel right-of-way and will continue to be utilized as part of the Project to provide access to Lot 19. The Wilson House at 10921 Old Santa Susana Pass Road situated on Parcel 1 (APN 2723-005-002) has been determined a historic resource per the SurveyLA project completed for the Porter Ranch-Chatsworth Community Plan Area in 2015, and as a result of the current intensive-level survey and evaluation. The Project will involve demolition of existing structures (other than the Wilson House), grading, tree removal, new construction (90,000 square feet), and paving of new roadway access. The Project would subdivide the Site into 19 parcels for the development of 18 single-family homes (there will be a total of 19 homes including the rehabilitated Wilson House). Each home would be 1 to 2 stories (with a maximum height of 29 feet), on a minimum of 20,000 square foot lots. All lots will have designated 2,200 square foot horse-keeping areas. Horse trails will be provided within the Site.

The Project will require approval of the following discretionary actions:
1) Pursuant to LAMC Section 12.32 F, a Zone Change from A2-1 to RA-1-K, in order to permit the development of 19 single-family residential horse-keeping lots. The City Council has initiated a Zone Change request to include the –K designation.
2) Vesting Tentative Tract for 19 single family lots of 20,000 square feet each (VTTM 074478).
3) Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, haul route, and building permits.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

Eric Borstein
Santa Susana Estates LLC
11766 Wilshire Boulevard
Los Angeles, CA 90025

FINDING:

The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance

(CONTINUED ON PAGE 2)

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-make may adopt the mitigated negative declariation, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM	**TITLE**	**TELEPHONE NUMBER**
Valentina Knox Jones	City Planner	(818) 374-5038

ADDRESS	SIGNATURE (Official)	DATE
200 N. SPRING STREET, 7th FLOOR LOS ANGELES, CA. 90012	Blake Lamb	2/6/19

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

Mitigated Negative Declaration

Santa Susana Estates Project

Case Number: ENV-2016-3175-MND
CPC-2016-3174-ZC
VTT-74478

Project Location: Commonly known as: 10811, 10821, 10877, and 10921 Old Santa Susana Pass Road, Los Angeles, California 91311

Community Plan Area: Chatsworth-Porter Ranch

Council District: 12 – Englander

Project Description: The Project Site is a generally level, irregularly-shaped parcel. The Site is primarily bounded by Calle Milagros to the south; Old Santa Susana Pass Road to the east; Farralone Avenue to the west; and the United Cerebral Palsy Center to the north. Bee Canyon Road bisects the Site and is used for local access by a few properties. The Project Site contains three occupied single-family homes, and several old, dilapidated accessory buildings, and vacant land. The Santa Susana Flood Channel (LA County Flood Control) cuts across the Site and there is a concrete reinforced bridge connecting the two sides. There is an existing easement and existing concrete bridge over the channel right-of-way and will continue to be utilized as part of the Project to provide access to Lot 19. The Wilson House at 10921 Old Santa Susana Pass Road situated on Parcel 1 (APN 2723-005-002) has been determined a historic resource per the SurveyLA project completed for the Porter Ranch-Chatsworth Community Plan Area in 2015, and as a result of the current intensive-level survey and evaluation. The Project will involve demolition of existing structures (other than the Wilson House), grading, tree removal, new construction (90,000 square feet), and paving of new roadway access. The Project would subdivide the Site into 19 parcels for the development of 18 single-family homes (there will be a total of 19 homes including the rehabilitated Wilson House). Each home would be 1 to 2 stories (with a maximum height of 29 feet), on a minimum of 20,000 square foot lots. All lots will have designated 2,200 square foot horse-keeping areas. Horse trails will be provided within the Site.

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3) Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, haul route, and building permits.

PREPARED FOR:	**PREPARED BY:**	**APPLICANT:**
The City of Los Angeles, Department of City Planning	CAJA Environmental Services, LLC, 15350 Sherman Way, Suite 315, Van Nuys, CA 91406	Santa Susana Estates, LLC 1766 Wilshire Boulevard, Suite 820, Los Angeles, CA 90025

January 2019

CITY OF LOS ANGELES

CALIFORNINA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☒ Aesthetics	☐ Greenhouse Gases	☐ Population and Housing
☐ Agriculture and Forestry Resources	☐ Hazards and Hazardous Materials	☐ Public Services
☐ Air Quality	☐ Hydrology and Water Quality	☐Recreation
☒ Biological Resources	☐ Land Use and Planning	☐Transportation and Traffic
☒ Cultural Resources	☐ Mineral Resources	☒ Tribal Cultural Resources
☐ Geology and Soils	☒ Noise	☐ Utilities and Service Systems
		☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

☐☐I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	**Date**

Printed Name

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

BACKGROUND

PROPONENT NAME	**PHONE NUMBER**
Santa Susana Estates, LLC	(310) 582-1991
PROPONENT ADDRESS	
11766 Wilshire Boulevard, Suite 820, Los Angeles, CA 90025	
AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
City of Los Angeles Department of City Planning	January 2019
PROPOSAL NAME (If Applicable)	
Santa Susana Estates	

ENVIRONMENTAL IMPACTS (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	**AESTHETICS.** Would the project:				
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a scenic highway?	☐	☐	☒	☐
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐
2.	**AGRICULTURE AND FORESTRY RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project, and the Forest Legacy Assessment project, and forest carbon measurement mythology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b.	Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☒	☐
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
3.	**AIR QUALITY.** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project result in:				
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 air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e.	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
4.	**BIOLOGICAL RESOURCES.** Would the project:				
a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local or regional plans, policies, regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☒	☐	☐
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
5.	**CULTURAL RESOURCES:** Would the project:				
a.	Cause a substantial adverse change in significance of a historical resource as defined in *State CEQA Guidelines* §15064.5?	☐	☒	☐	☐
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to *State CEQA Guidelines* §15064.5?	☐	☒	☐	☐
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d.	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐
6.	**GEOLOGY AND SOILS.** Would the project:				
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii.	Strong seismic ground shaking?	☐	☐	☒	☐
iii.	Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv.	Landslides?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e.	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?	☐	☐	☒	☐
7.	**GREENHOUSE GAS EMISSIONS.** Would the project:				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b.	Conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
8.	**HAZARDS AND HAZARDOUS MATERIALS.** Would the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it 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	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	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 the people residing or working in the area?	☐	☐	☐	☒
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
9.	**HYDROLOGY AND WATER QUALITY.** Would the proposal result in:				
a.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☒	☐
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☒	☐
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f.	Otherwise substantially degrade water quality?	☐	☐	☒	☐
g.	Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☒	☐
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j.	Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
10.	**LAND USE AND PLANNING**. Would the project:				
a.	Physically divide an established community?	☐	☐	☒	☐
b.	Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a 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?	☐	☐	☐	☒
11.	**MINERAL RESOURCES**. Would the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
12.	**NOISE.** Would the project:				
a.	Result in 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.	Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c.	Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d.	Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above	☐	☒	☐	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	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 airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
13.	**POPULATION AND HOUSING**. Would the project:				
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐
14.	**PUBLIC SERVICES.**				
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i.	Fire protection?	☐	☐	☒	☐
ii.	Police protection?	☐	☐	☒	☐
iii.	Schools?	☐	☐	☒	☐
iv.	Parks?	☐	☐	☒	☐
v.	Other public facilities?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
15.	**RECREATION.**				
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
16.	**TRANSPORTATION AND TRAFFIC**. Would the project:				
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 standard 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 to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e.	Result in inadequate emergency access?	☐	☐	☒	☐
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐
18. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e. 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?	☐	☐	☒	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
19.	**MANDATORY FINDINGS OF SIGNIFICANCE.**				
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☐	☒	☐
c.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Mitigation Measures (MM) and Project Design Features (PDF)

1. AESTHETICS

Mitigation Measure

MM-AES-1 Lighting

Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

2. AGRICULTURE AND FORESTRY RESOURCES

None required.

3. AIR QUALITY

None required.

4. BIOLOGICAL RESOURCES

Project Design Features

PDF-Bio-1 Invasive, exotic plant species shall be prohibited as part of the landscape plan for the Project. The invasive plants to be prohibited from use in landscaping shall include any of the plant species rated as “High” or “Moderate” in the California Invasive Plant Inventory Database, which is maintained by the California Invasive Plant Council (Cal-IPC).

This prohibition will be included in the CC&Rs for future residents.

PDF-Bio-2 To avoid any incidental construction-related impacts to the potential jurisdictional channel, a solid, temporary barrier (e.g., a silt fence or equivalent) shall be installed and maintained just outside the top of the channel bank prior to the start of construction activities.

Mitigation Measures

MM-Bio-1 Nesting Birds

When feasible, any proposed clearing and grubbing of vegetation within the project limits and the generation of nuisance noise during construction activities should occur after September 15 and prior to March 15, which would be outside the typical breeding season (i.e., March 15–September 15) for most birds.

If avoidance of this breeding season is not feasible, a nesting bird survey should be conducted by a qualified biologist within 2 to 3 days prior to any vegetation-clearing activities to ensure that birds are not engaged in active nesting within 100 ft of the work area.

If nesting birds are discovered during this survey, the biologist will identify an appropriate setback, or buffer (i.e., up to 500 ft depending on the circumstances and specific bird species) where no construction activities or other disturbances are allowed to occur until after the birds have fledged or otherwise abandoned the nest.

The adverse effects of lighting on wildlife can be avoided provided the construction activities associated with the project occur during daylight hours. However, if construction must occur during nighttime hours, the amount of lighting used should be minimized and localized as much as is feasible. This temporary impact is unlikely to result in a significant impact to nocturnal wildlife in the area. If additional lighting is to be installed in the work area, this lighting should be directed downward and should not be directed outward toward any adjacent open space areas.

MM-Bio-2 **Flightless Bats**

To avoid potential direct mortality to flightless young bats, tree trimming/removal activities associated with the Project shall be conducted outside the recognized bat maternity season, which occurs from April 1 through August 31 in southern California. This period also coincides with the bird nesting season of February 15 through September 1.

If trees must be trimmed or removed during the bat maternity season referred to above, a preconstruction bat survey of those trees shall be conducted within 2 to 3 days prior to the trimming or removal.

If any bat roosting is detected, no tree removal or trimming activities shall occur within 100 feet of the roosting location until the bats have completed their roosting activities.

MM-Bio-3 **Roosting Bats**

To avoid potential direct mortality to roosting bats, the attic spaces of the various houses shall be examined for the presence of bats within 2 to 3 days prior to demolition of those structures. These attic spaces are the only sites identified within structures throughout the study area that could potentially support maternity roosting by large numbers of bats.

If maternity-roosting bats are found, a humane eviction and exclusion shall be performed outside of the recognized bat maternity season (April 1–August 31 in southern California) to prevent potential direct impacts to roosting bats, including flightless young, and that alternate roosting structures (e.g., "bat houses") be installed to mitigate for the loss of habitat.

However, unless bats are found roosting within the attic spaces of the various residences, no extensive loss of bat day-roosting habitat is anticipated from the removal of structures within the study area.

MM-Bio-4 **Burrowing Owls**

To avoid any potential adverse impacts to burrowing owls that may unexpectedly show up on site, a focused survey of the study area is recommended within 3 days of the start of construction activities. If no burrowing owls are found, construction can proceed immediately. If this species is present, a qualified biologist shall be present during construction activities to monitor the work and flush any birds out of the project area to ensure they are adequately protected.

MM-Bio-5 Non-Protected Significant Trees shall be replaced on a one-to-one (1:1) ratio to the satisfaction of the City of Los Angeles.

Protected Significant Trees shall be replaced on a four-to-one 4:1 ratio to the satisfaction of the Urban Forestry Division.

5. CULTURAL RESOURCES

MM-Cultural-1 The Wilson House shall be protected by cyclone-fencing, K-rails, plywood window coverings, or other means, to create a buffer from the accidental intrusion of construction equipment onto, or near, the Wilson House property. The exterior character-defining features of the Wilson House shall also be protected during tree trimming and removal activities, and future construction activities on the lot. Any damage that may occur to the Wilson House from construction or maintenance activities, shall be repaired in accordance with The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, & Reconstructing Historic Buildings (Kay D. Weeks and Anne E. Grimmer, revised 2017) under the supervision of a qualified Historic Architect or Architectural Historian (with experience in preparing repair and rehabilitation plans.)

MM-Cultural-2 The Wilson House shall not be substantially altered or demolished, and that the resource shall retain its eligibility for listing in the in the National Register, California Register, and as a Monument. The recommended mitigation measures may avoid adverse impacts by not materially altering those physical characteristics and aspects of integrity that convey the buildings historic

significance and architecture. If the recommended mitigation measure is adopted, the Project shall not have a significant effect on the historical property. The Wilson House shall be rehabilitated to serve its original use as a single family residence.

Project proponents intend to use the Wilson House as a single-family residence and under CEQA they are required to follow The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, & Reconstructing Historic Buildings (Kay D. Weeks and Anne E. Grimmer, revised 2017.) Project proponents shall retain the services of a qualified Historic Architect or Architectural Historian (with experience in preparing rehabilitation plans) to assist in the future use and function of the building.

MM-Cultural-3 Prior to grading, a professional Archaeologist shall be retained to observe excavations on the property for the presence of archaeological materials. Prior to grading, the areas to be monitored will be determined from consultation with the grading contractor during the pre-grade meeting.

All artifacts discovered at the development site shall be inventoried and analyzed by the Project Archaeologist. If any artifacts of Native American origin are discovered, the Property Owner/Developer and Project Archaeologist shall notify the City of Los Angeles Planning Department and the appropriate local Native American tribe identified by the Native American Heritage Commission. The significance of Native American resources shall be evaluated in accordance with the provisions of the California Environmental Quality Act (CEQA) and shall consider the religious beliefs, customs, and practices of the tribe. All items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling. Native American artifacts that cannot be avoided or relocated at the Project site shall be prepared in a manner for curation, and the Project Archaeologist shall deliver the materials to an accredited curation facility approved by the City of Los Angeles within a reasonable amount of time.

Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. Subsequent to analysis and reporting, these artifacts shall be subjected to curation or returned to the Property Owner/Developer, as deemed appropriate.

Once ground-altering activities have ceased or the Project Archaeologist determines that monitoring activities are no longer necessary, monitoring activities may be discontinued following notification to the City of Los Angeles Planning Department.

A report of findings, including an itemized inventory of recovered artifacts, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered artifacts. The report and inventory, when submitted to the City of Los Angeles Planning Department, shall signify completion of the program to mitigate impacts to archaeological and/or cultural resources. A copy of the report shall also be filed with the South Central Coastal Information Center (SCCIC).

MM-Cultural-4 If any paleontological resources (e.g., plant or animal fossils) are encountered before or during grading, the Property Owner/Developer shall retain a qualified Paleontologist to evaluate unanticipated discoveries and to take appropriate measures to protect or preserve them for study. The Paleontologist shall submit a report of findings that will also provide specific recommendations regarding further measures (i.e., paleontological monitoring) that may be appropriate. Where monitoring is appropriate, the program must include, but not be limited to, the following measures:

Assign a Paleontological Monitor, trained and equipped to allow the rapid removal of fossils with minimal construction delay, to the site full time during earth-disturbing activities.

Divert earth-disturbing activities away from the immediate area of the discovery until the Paleontological Monitor has completed salvage. If construction personnel make the discovery, the grading contractor shall immediately divert construction and notify the Paleontological Monitor of the find.

Prepare, identify, and curate all recovered fossils for documentation in the summary report and transfer to an appropriate repository.

Prepare and submit a technical report describing the identification, salvage, evaluation, and treatment of all fossils discovered during grading to the City of Los Angeles. Transfer collected specimens with a copy of the report to the depository.

6. GEOLOGY AND SOILS

None required.

7. GREENHOUSE GAS EMISSIONS

None required.

8. HAZARDS AND HAZARDOUS MATERIALS

None required.

9. HYDROLOGY AND WATER QUALITY

None required.

10. LAND USE AND PLANNING

None required.

11. MINERAL RESOURCES

None required.

12. NOISE

Project Design Features

PDF-Noise-1 A noise barrier with a minimum height of 6 ft above ground will be implemented along the perimeter of the outdoor active use areas, such as backyards, associated with the three front-row dwelling units along Topanga Canyon Boulevard/Santa Susana Avenue.

PDF-Noise-2 Mechanical ventilation systems such as air conditioning are required for all proposed residential dwelling units.

PDF-Noise-3 Building façade upgrades such as double-paned windows with a minimum STC rating of 30 are required for the three front-row dwelling units along Topanga Canyon Boulevard/Santa Susana Avenue.

Mitigation Measures

MM-Noise-1 The construction contractor shall conduct construction activities outside of the prohibited hours of construction specified in Section 41.40 of the Los Angeles Municipal Code, which prohibits construction activity (including demolition) and repair work where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling, hotel, apartment, or other place of residence 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, unless the Board of Police Commissioners has authorized such use. All such activities are also prohibited on Sundays and all federal holidays.

MM-Noise-2 A minimum temporary construction barrier height of 14-foot (ft) high perimeter wall shall be placed along the northern, southern, and western construction boundary such that the line-of-sight from ground-level construction equipment and sensitive receptors would be blocked and to achieve a sound level reduction of at least 13 dBA. The construction barrier may be any material that has a minimum Sound Transmission Class (STC) rating of 28. All noise barrier material

types are acoustically effective if they meet this minimum STC rating. This barrier could include heavy-duty materials such as vinyl-coated polyester (VCP).

MM-Noise-3 During all project site excavation and grading, the project contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.

MM-Noise-4 The project contractor shall place all stationary construction equipment so that emitted noise is directed away from the most sensitive receptors nearest the project site whenever feasible.

MM-Noise-5 The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and most noise-sensitive receptors nearest the project site during all project construction whenever feasible.

13. POPULATION AND HOUSING

None required.

14. PUBLIC SERVICES

Project Design Features

PDF-Police-1 **Public Services (Police – Demolition/Construction Sites)**

Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

PDF-Police-2 Upon completion of the Project, the Devonshire Area commanding officer shall be provided with a diagram of each portion of the property. The diagram shall include access routes and any additional information that might facilitate police response.

15. RECREATION

None required.

16. TRANSPORTATION/TRAFFIC

Project Design Feature

PDF-Traffic-1 A Construction Traffic/Management Plan will be submitted to LADOT for review and approval.

The bulk of the work will be conducted on site. However, if temporary lane closures were needed it would require Street Services approval.

Existing access for the site would be maintained for construction access.

Deliveries of construction material will be coordinated to non-peak travel periods, to the extent possible.

17. TRIBAL CULTURAL RESOURCES

Mitigation Measure

MM-Tribal-1 Prior to commencing any ground disturbance activities including excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site, the Applicant, or its successor, shall retain and pay for archeological monitors, determined by the City's Office of Historic Resources to be qualified to identify subsurface tribal cultural resources. The archeological monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological monitor shall be assigned to each location where the ground disturbance activities are occurring.

Prior to the commencement of any ground disturbance activities at the project site, the Applicant, or its successor, shall notify any California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project that ground disturbance activities are about to commence and invite the tribes to observe the ground disturbance activities, if the tribes wish to monitor.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by the qualified archeologist, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning, Office of Historic Resources.

2. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the Applicant, or its successor, reasonably concludes that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by a qualified archaeologist and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has

complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File. 9. Notwithstanding paragraph 8 above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and shall comply with the City's AB 52 Confidentiality Protocols.

18. UTILITIES AND SERVICE SYSTEMS

Project Design Features

PDF-Utilties-1 Wastewater Service

Prior to the development of a new building, the capacity of the on-site sanitary sewers that would serve the building shall be evaluated based on applicable Bureau of Sanitation and California Plumbing Code standards and replacement or new sanitary sewers shall be installed on-site as necessary to accommodate proposed flows.

As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project's wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. If street closures for construction are required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety.

PDF-Utilities-2 Water Service

New on-site water mains and laterals would be installed in accordance with City Plumbing Code requirements, where necessary, to distribute water within the Project Site.

As part of the building permit process, the Project Applicant shall confirm with the LADWP Water Service Organization (WSO) that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the

construction and operation phases. If the water infrastructure has insufficient capacity, then the Project Applicant shall be required to build water lines to a point in the system with sufficient capacity. If street closures for construction are required, the Project applicant shall coordinate with LADOT on a traffic control plan.

19. MANDATORY FINDINGS OF SIGNIFICANCE

See above mitigation measures.

2. PROJECT DESCRIPTION

The section is based in part on the following items, included as Appendix A of this IS/MND:

A-1 Design Set, Dahlin, October 2018.

A-2 Vesting Tentative Tract Map, Stantec, August 21, 2018.

A-3 Landscape Plan, Studio Pad, January 2019.

A-4 Zone Change Map, Leon Mapping and GIS Services, October 2017.

Introduction

Project Title:	Santa Susana Estates
Case Numbers:	ENV-2016-3175-MND CPC-2016-3174-ZC VTT-74478
Project Location:	Commonly known as: 10811, 10821, 10877, and 10921 Old Santa Susana Pass Road, Los Angeles, California 91311
Lead Agency:	City of Los Angeles, Department of City Planning 6262 Van Nuys Boulevard, Suite 430, Van Nuys, CA 91401
Applicant:	Santa Susana Estates, LLC 11766 Wilshire Boulevard, Suite 820, Los Angeles, California 90025
Prepared By:	CAJA Environmental Services, LLC 15350 Sherman Way, Suite 315, Van Nuys, CA 91406

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) under the California Environmental Quality Act (CEQA) consists of a new, single-family residential development.

CEQA Statutes and Guidelines

According to CEQA Statute § 21064.5:

MITIGATED NEGATIVE DECLARATION

"Mitigated negative declaration" means a negative declaration prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur,

and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

According to CEQA Guidelines Article 6, Negative Declaration Process:

15070. DECISION TO PREPARE A NEGATIVE OR MITIGATED NEGATIVE DECLARATION

A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

15071. CONTENTS

A Negative Declaration circulated for public review shall include:

(a) A brief description of the project, including a commonly used name for the project, if any;

(b) The location of the project, preferably shown on a map, and the name of the project proponent;

(c) A proposed finding that the project will not have a significant effect on the environment;

(d) An attached copy of the Initial Study documenting reasons to support the finding; and

(e) Mitigation measures, if any, included in the project to avoid potentially significant effects.

Project Location

The Project Site is located at 10811 to 10921 N. Old Santa Susana Pass Road, in the Chatsworth-Porter Ranch Community Plan Area of Los Angeles, CA 91311. See **Appendix A-2** for the Site layout and boundaries.

Regional Setting

The Site is approximately 25 miles northwest of Downtown Los Angeles and approximately 16 miles north of the Pacific Ocean. The City of Simi Valley boundary is approximately 1.5 miles to the west.

The Site is located within the Chatsworth-Porter Ranch Community Plan. The Chatsworth-Porter Ranch plan area is located along the north-west edge of the City of Los Angeles boundary. The land use in this plan area is diverse and includes a broad mix of land uses. The furthest north-western portion of the plan area consists of mountainous hillside areas, mostly set aside for open space and recreational uses. Mixed in along the edges of the hillside areas are equestrian properties and horse keeping areas. Equestrian trails and uses are included along the northwestern portion of the project areas to embrace the equine lifestyle. The northern portion of the planning area is dominated by the Porter Ranch Specific Plan, and the further southeast you go within the planning area, the more it transitions to suburban residential, commercial and industrial. The area around Topanga Boulevard and Chatsworth Street consists of single-family homes and suburban patterns of development. The Project Site is in an area that serves as a transition from the rural, sparsely developed land near the base of the hills and the more suburban, developed land along Topanga. The Site is completely surrounded by additional developments and is not on the direct edge of suburban sprawl.

Regional and Local Access

Regional access is provided by the Ronald Reagan Freeway (SR-118) located approximately 3,000 feet north of the Site with on- and off-rams at Topanga Canyon Boulevard (SR-27). Local access is provided from Old Santa Susana Pass Road, via Topanga Canyon and Calle Milagros (private street and fire lane).

Public Transit

Metro bus lines 166/364 and 244/245 have a stop at Devonshire and Topanga Canyon, approximately 0.75 miles south of the Site. Metro Orange Line Bus Rapid Transit has a Chatsworth Station near Lassen and Canoga, approximately 1.3 miles southeast of the Site. The Orange Line station connects to the Chatsworth Transit Center, which provides service to both Metrolink and Amtrak trains lines.

Site Characteristics

The Project Site is a generally level, irregularly-shaped parcel. The Site is primarily bounded by Calle Milagros to the south; Old Santa Susana Pass Road to the east; Farralone Avenue to the west; and the United Cerebral Palsy Center to the north. Bee Canyon Road bisects the Site and is used for local access by a few properties. The Site has an approximate 584-foot frontage along Old Santa Susana Pass Road with a depth of approximately 1,175 feet. A portion of the most westerly portion of the Site is located westerly of an improved Los Angeles County Flood Control Channel easement. There is an existing easement and existing concrete bridge over the

channel right-of-way and will continue to be utilized as part of the Project to provide access to Lot 19.

The Site's assessor parcel number (APN), zoning, land use designation, and lot size is listed on **Table 2-1, Project Site**. The Site is approximately 501,714 square feet (net) (11.52 net acres or 11.92 gross acres). The Site is zoned A2-1 (Agriculture, Height District 1)[1]. The Site has the following Zoning Information (ZI):

ZI-1732 Council Office Notification (Rock-Out-Croppings);

ZI-2438 Equine Keeping in the City of Los Angeles; and

ZI-2462 Modifications to SF Zones and SF Zones Hillside Area Regulations (on APN 2723-005-030)

ZI-01650-12 (on APN 2723005003)

Table 2-1
Project Site

Address	Size (sf)	APN	Zone	General Plan Land Use
10821 N. Old Santa Susana Pass Road	35,547.9	2723-005-017	A2-1	Very Low I Residential
None	64,301.1	2723-005-017	A2-1	Very Low I Residential
10811 N. Old Santa Susana Pass Road	90,092.8	2723-005-030	A2-1	Very Low I Residential
None	231,733.7	2723-005-002	A2-1	Very Low I Residential
None	70,435.7	2723-005-003	A2-1	Very Low I Residential
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org, August 2017.				

Other Considerations

The western portion is in a Hillside Area. The Site is in a liquefaction area, Very High Fire Hazard Severity Zone, and Urban Agriculture Incentive Area.[2]

Existing Uses

The Project Site contains three occupied single-family homes, and several old, dilapidated accessory buildings, and vacant land. The Santa Susana Flood Channel (LA County Flood Control) cuts across the Site and there is a concrete reinforced bridge connecting the two sides. 13 percent of the Site is located west of the channel. This area is proposed for only one new home lot and portions of two lots containing only two horse paddocks. Bee Canyon divided the Site into a west portion and east portion.

[1] https://planning.lacity.org/zone_code/Appendices/sum_of_zone.pdf
[2] http://zimas.lacity.org/

The Site is composed primarily of disturbed, ruderal vegetation with some native trees.[3] There are 19 coast live oak (Quercus agrifolia) trees on the Site:

15 of these trees will be protected throughout construction and will be retained.

4 of these trees are recommended for removal due to grading constraints, drainage and other required utility services, as well as potential constraints due to the proposed equestrian requirements.

There are also 129 Non-Protected Significant Trees on the Site: 46 California pepper trees (Schinus molle), 27 olive trees (Olea europa), 10 Mexican elderberry (Sambucus mexicana), 6 blue gum eucalyptus (Eucalyptus globulus), 5 citrus, 4 Canary Island palms (Phoenix canariensis), 3 she oaks (Casuarina sp.), 3 Evergreen Ash (Fraxinus uhdei) among 25 other species. 109 of the Non-Protected Significant Trees are recommended for removal to the satisfaction of the City of Los Angeles. The other 20 Non-Protected Significant Trees will remain protected in place.[4]

Any tree removal will comply with the City's Tree Replacement Program (Urban Forestry Division).

The Wilson House at 10921 Old Santa Susana Pass Road situated on Parcel 1 (APN 2723-005-002) has been determined a historic resource per the SurveyLA project completed for the Porter Ranch-Chatsworth Community Plan Area in 2015, and as a result of the current intensive-level survey and evaluation. The historic report has confirmed the SurveyLA findings that the property is a significant historic resource eligible for listing in the California Register as well as the National Register, and as a Monument. [5].

Surrounding Uses

North of the east portion is the United Cerebral Palsy complex with multiple buildings, roads, and open space (zoned A2-1). There is also undeveloped land and several single-family homes north of the west portion.

South of the Site are single-family homes.

East of the Site is Old Santa Susana Pass Road and Topanga Canyon Boulevard. Beyond these roads is open space rock outcropping (Stony Point Park zoned OS-1XL) and a horse ranch (zoned A2-1).

West of the Site is Farralone Avenue and undeveloped land and a horse stable.

Proposed Project

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3 Evaluation of Biological Resources, LSA, July 28, 2016. Included as an appendix to this MND.

4 Protected Tree Report, The Tree Resource, November 6, 2018. Included as an appendix to this MND.

5 Historic Resource Assessment, Daly & Associates, December 2018.

The Project will involve demolition of existing structures (other than the Wilson House), grading, tree removal, new construction (90,000 square feet), and paving of new roadway access.

The Project would subdivide the Site into 19 parcels for the development of 18 single-family homes (there will be a total of 19 homes including the rehabilitated Wilson House). Each home would be 1 to 2 stories (with a maximum height of 29 feet), on a minimum of 20,000 square foot lots. All lots will have designated 2,200 square foot horse-keeping areas. Horse trails will be provided within the Site.

See **Table 2-2** for each lot area and floor area.

Table 2-2
Lot and Floor Area

Lot No.	Net Lot (sf)[e]	Max Allowable Floor Area (sf)[a]	Building Area (sf)[d]	Actual FAR
1	20,782	5,000	4,983	0.24
2	20,130	5,000	4,750	0.24
3	20,065	5,000	4,983	0.25
4	20,052	5,000	4,750	0.25
5[b]	20,055	5,000	4,000	0.20
6	20,024	5,000	4,983	0.25
7	20,035	5,000	4,983	0.25
8	20,024	5,000	4,983	0.25
9	20,042	5,000	4,983	0.25
10	20,034	5,000	4,983	0.25
11	20,027	5,000	4,983	0.25
12	20,004	5,000	4,983	0.25
13	20,009	5,000	4,983	0.25
14[c]	23,844	5,000	5,960	0.25
15[c]	20,249	5,000	5,950	0.29
16[c]	22,074	5,000	5,950	0.27
17[c]	24,014	5,000	5,950	0.25
18	21,953	5,000	4,983	0.23
19[c]	66,443	10,000	6,005	0.09

sf = square feet; FAR = floor-area-ratio
(a) The Maximum allowable FAR without applying any FAR Bonus
(b) Existing 1,900 sf building footprint, plus allowance for 2,100 sf future addition (under separate future permit)
(c) Plan 2 meets the FAR Bonus criteria and the maximum allowable FAR per LAMC 12.07 including the FAR Bonus is 6,000 sf
(d) Actual Building Square Footage includes 1,200 sf accessory dwelling units (ADU) are optional improvement for lots 5, 14, 15, 16, 17, and 19.
(e) Maximum Building Envelop (MBE) for lots 2 through 18 is 5,000 sf. MBE for lot 1 is 4,894 sf and MBE for lot 19 is 10,000 sf
Table: CAJA Environmental Services, October 2018.

A 12-foot wide equestrian trail will be included in the project area. The unencumbered equestrian trail will run north-south along the east side of Bee Canyon, extending the existing trail within Tract 62958 further to the north.

The Wilson House (on Lot 5) will be preserved and retained to ensure its continued status as a historic resource. It will be rehabilitated with current plumbing, electrical, and HVAC standards while rehabilitating the building using the Secretary of the Interior Standards (SOIC).

All of the proposed lots will conform with the lot area, width, height, setback and frontage requirements of the proposed RA-1-K overlay zone and will allow equestrian uses in conformance with the equestrian standards regarding minimum pad area for homes, horse-keeping areas, access to equestrian trails, vehicular access for maintenance of the equestrian pad area and the delivery of feed and removal of waste.

Utilities

Sanitary sewer service will be provided by the City of Los Angeles for lots 1 through 18. A sewer line serving lots 1 through 9 will be constructed in proposed A Street and connect to an existing sewer line in Bee Canyon Road. Lots 10 through 13 are anticipated to have lateral connections constructed to the existing sewer line located in Calle Milagros. Lots 14 through 18 will either have lateral connections to the existing sewer line located in Bee Canyon Road, or alternatively, a new parallel sewer line will be constructed in Bee Canyon Road to serve lots 14 through 18. Lot 19 will not connect to a sewer line and will utilize a private septic system.

Water service for the project will be provided by City of Los Angeles Department of Water and Power (LADWP). It is anticipated that private water lines will be constructed to serve all lots with points of connection to existing water lines located in Old Santa Susana Road and Farralone Avenue. Electricity will be provided by LADWP. Gas will be provided by Southern California Gas.

Access and Circulation[6]

A new private street (A Street) will extend from Old Santa Susana Road to Bee Canyon Road and provide access to Lots 1 through 9.

The existing private street, Calle Milagros will be widened and provide access to Lots 10-13.

Bee Canyon Road will be improved and provide access to Lots 14-19. Between Lot 17 and Lot 18 there would be a driveway leading to a bridge over the Santa Susana Wash flood channel to Lot 19.

The Applicant has received input from area residents that vehicular and pedestrian gates on Old Santa Susana Pass Road at A Street (full ingress and egress) and at Calle Milagros (egress only) may be desirable. Although gates are not currently proposed by the Project, this IS/MND includes analysis of the Project both with and without vehicular and pedestrian gates at these locations so that the impacts of such gates can be studied. If as a result of this study, gates continue to be desired, the Applicant may consider including gates as part of the Project.

[6] VTTM, August 21, 2018. Included as an appendix to this MND.

Lots 1 through 11 of Tract 62958, and 3 other homes located north west along Bee Canyon use Calle Milagros as primary access, and would also become part of the gated community.

Landscape

See **Appendix A-3** for details of the landscape plan. The Plan shows the existing coast live oak trees to be protected and existing non-protected trees that will remain and a natural swale for bio-filtration.

Green/Conservation Features

The Project will comply with the 2017 Los Angeles Green Building Code (LAGBC),[7] which is based on the 2016 California Green Building Standards Code (CalGreen, effective January 1, 2017).[8]

The Project replaces several outdated buildings with significantly more environmentally friendly homes. Each new home will meet State and local green building standards, be landscaped with drought tolerant plants utilizing a high-efficiency irrigation system, and will minimize the need for additional energy and water demand.

Storm Drainage and LID

The Project Site is bisected by an existing, rectangular, concrete-lined channel referred to as Santa Susana Creek. The proposed improvements will convey storm water into private streets and a storm drain line that will discharge into the Santa Susana Creek channel. Existing drainage patterns will be maintained with this system. Approximately 4% of the site is impervious in its existing condition and the proposed development will be approximately 25% impervious. While proposed site improvements will result in an increase in impervious areas, the post-development peak flow rates will not increase from pre-development peak flow rates. This is a result of the project improvements removing the debris factor which will in turn reduce the burned and bulked flow rate, as well as the implementation of Low Impact Development (LID) Best Management Practices (BMPs). A Low Impact Development (LID)/Standard Urban Storm Water Mitigation Plan (SUSMP) will be prepared to demonstrate compliance with the Los Angeles City LID Requirements. Infiltration of storm water has been determined to be infeasible due to the risk of liquefaction hazards. Therefore, anticipated Best Management Practices (BMP's) include stormwater capture and use and high efficiency biofiltration/biotreatment. The high efficiency biofiltration/biotreatment BMPs will be sized to adequately capture 1.5 times the volume not managed through capture and use BMPs.[9]

[7] Los Angeles Department of Building and Safety: http://ladbs.org/forms-publications/forms/green-building

[8] California Building Codes: http://www.bsc.ca.gov/Codes.aspx

[9] Stantec, August 2018.

Construction Information

The estimated construction schedule is shown in **Table 2-3, Construction Schedule**. The Project will require approximately 5,200 net cubic yards (cy) of import[10] for grading/leveling.[11] The truck route will use Topanga Canyon Boulevard to access the Site from the I-118 freeway.

Table 2-3
Construction Schedule

Phase	Duration
Demolition	22 days
Grading	31 days
Trenching	54 days
Building Construction	257 days
Architectural Coatings	116 days (overlap with last 5 months of construction)
Paving	20 days (overlaps with last month of construction)
Duration is based on working days. Construction schedule, including start, end, and duration dates are estimates only. Estimates provided in the Air Quality analysis, August 2017. Table: CAJA Environmental Services, August 2017.	

Discretionary Actions

See **Appendix A-4** for a map of the zone change. The Project will require approval of the following discretionary actions: [12]

1) Pursuant to LAMC Section 12.32 F, a Zone Change from A2-1 to RA-1-K, in order to permit the development of 19 single-family residential horse-keeping lots. The City Council has initiated a Zone Change request to include the –K designation.

2) Vesting Tentative Tract for 19 single family lots of 20,000 square feet each (VTTM 074478).

3) Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, haul route, and building permits.

[10] 12,800 cy fill - 7,600 cy cut = 5,200 cy import.

[11] VTTM, August 21, 2018. Included as an appendix to this MND.

[12] Project Applicant, July 2017.

3. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS

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

Less Than Significant Impact. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Based on the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of whether a project would result in a significant impact on a scenic vista is made considering the following factors:

- 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 ocean);
- Whether a project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which a project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

The Project Site is in a relatively flat area in a largely suburban area in the northwest portion of the San Fernando Valley. The existing visual character of the surrounding locale is suburban and the Project Site is not located within or along a designated scenic highway[1], corridor, or parkway. Topanga Canyon is only a scenic highway from Pacific Coast Highway to Mulholland Drive segment, which is 8 miles from the Project Site. Views in the vicinity of the Project Site are largely constrained by the existing vegetation on the Project Site and structures on adjacent parcels.

CEQA requires analysis of public views with broad access by persons in general, not private views that will affect a limited number of people.[2] Features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual

[1] Los Angeles Mobility Plan 2035, Inventory of Designated Scenic Highways: http://planning.lacity.org/documents/policy/mobilityplnmemo.PDF

[2] Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].

prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc.[3] the Project Site has one historic structure, the Wilson House, that will be retained. There are no tall features such as hills or overlooks on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community.

At the ground level, views to the north, northeast, and northwest including rock outcroppings in Stoney Point Park (275 feet east of the Site) and Santa Susana Pass State Historic Park (900 feet west of the Site). These views would not be substantially affected by the Project because views are primarily from public streets, which would remain, and the homes would be a maximum of 2 stories in height, the same as the existing homes south of Calle Milagros (50 feet south of the Site). From the public area (public right-of-way (ROW) on Santa Susana Pass and ROW on Topanga Canyon), the rock outcroppings and hills in the distance are visible between the structures and vegetation and will remain so with the Project. In addition, Topanga Canyon Boulevard is higher elevation than the Site, so the potential to block views from this street would be further diminished.

No designated scenic vistas in the local area would be impeded, and the Project would not substantially block any scenic vistas. Therefore, Project impacts to scenic vista would be less than significant.

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

Less Than Significant Impact.

A significant impact would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway.

The Project Site is not located within or along a designated scenic highway, corridor, or parkway. [4]

The zoning for the Project Site includes the notation ZI-1732 which refers to a City ordinance that requires the Council Office (currently Council District 12, Mitch Englander) to be notified of any applications filed for grading or soils reports on vacant lots, or plans for new buildings in the area.[5] The Site is near, but not within any rock outcroppings. The nearest rock outcropping is across Topanga Canyon Boulevard, approximately 275 feet east of the Site. There are also some rock outcroppings north and northwest of the Project Site, but also off-site. Views of the rock outcroppings would not be impeded by the Project.

[3] L.A. CEQA Thresholds Guide, 2006, section A.1 Aesthetics.

[4] California Scenic Highway Mapping Systems: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm

[5] http://zimas.lacity.org/documents/zoneinfo/ZI1732.pdf

The Wilson House at 10921 Old Santa Susana Pass Road (APN 2723-005-002) has been determined to be an historic resource per the SurveyLA project completed for the Porter Ranch-Chatsworth Community Plan Area in 2015, and as a result of the current intensive-level survey and evaluation. The current report has confirmed the SurveyLA findings that the property is a significant historic resource eligible for listing in the California Register as well as the National Register, and as a Monument. The Project will implement **Mitigation Measures MM-Cultural-1 and MM-Cultural-2,** which would avoid adverse impacts by not materially altering those physical characteristics and aspects of integrity that convey the buildings historic significance and architecture. With the implementation of the recommended mitigation measures, the Project will not result in a significant adverse impact on the historical property. Therefore, impacts would be reduced to a less-than-significant level.[6]

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact.

A significant impact may occur if a project was to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site.

Compatibility with Character of Surrounding Community

The Project would create a residential development in an area, which has multiple residential developments in the area. The Project would have uses that would be similar in scale and density to those that already exist in the area (especially to the south along Calle Milagros). The residential use will respond directly to the market demand for large, horse-accommodated estates.

The area is within the “K’ Equine keeping District and includes trails.[7] The Community Plan supports the establishment of "K" Horse keeping Supplemental Use Districts in appropriate areas in order to ensure the preservation of this equestrian lifestyle. The Project would be compatible with the equestrian and other uses found in the existing rural and suburban - residential landscape area. The homes would be similar in height (1 to 2 stories) to the existing homes on Calle Milagros. The architectural design would also reflect the area, with ranch and Spanish Hacienda estate styles. As a whole, the Project’s housing scale (density per acre) and horse-keeping facilities (paddocks and access to trails) would be compatible with the existing character. Therefore, the Project’s impacts with respect to the character of the community would be less than significant.

Other visual and aesthetic considerations

[6] Historic Resource Assessment, Daly & Associates, December 2018.

[7] http://planning.lacity.org/complan/pdf/cht_horse_2.pdf

The Project would be landscaped according to LAMC Section 12.40 and 12.41. The landscape design has been developed to connect the Project to the surrounding development.

While the Project Site is under construction, construction walls and barriers would be erected to protect the Site from vandalism and trespassing. The Project shall comply with LAMC Section 91.6205, which regulates signage on construction barriers.

During operation, the Project would be maintained in a safe and sanitary condition and in good repair, free from debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.

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

Less Than Significant Impact with Mitigation.

A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site, which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The Project Site and surrounding area are residential developments that contribute sources of nighttime lighting, including indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights.

The Site receives some spillover light from nearby off-site lighting sources such as from the homes on Calle Milagros, the United Cerebral Palsy Center, and vehicles on Topanga Canyon Boulevard, which is at a higher elevation than the Site

The Project would convert the mostly dark Site to an illuminated residential setting, albeit one with limited lighting. 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. Given the size of the Site, spacing between each lot, and the expected vegetation and trees to be planted, light would be attenuated to off-site locations. Lighting would not be expected to cause disability, discomfort or nuisance glare.[8] Consequently, the lighting from the Project is expected to be comparable to the existing lighting in the surrounding residential neighborhood. 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

[8] 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).

glare which would affect nighttime views in the area. Lighting impacts to adjacent residential properties can be minimized by implementing **Mitigation Measure MM-AES-1**. Therefore, the aesthetic impact of the Project's night lighting would be less than significant.

The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. However, the Project will limit reflective surface areas and the reflectivity of architectural materials used. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating as required by the Los Angeles Building Code. The Project will not result in a new source of substantial glare. Accordingly, impacts as a result of glare generated by the Project will be less than significant.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed "shadow-sensitive." Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

Winter and Summer Solstice

"Solstice" is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun's apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 1/2° of the arc. At winter solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. At the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year.

Screening Criteria[9]

Would the project include light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest or northeast?

[9] L.A. CEQA Thresholds Guide, 2006, section A.3 Shading.

- A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Shading, and review the associated Methodology to Determine Significance, as appropriate.

- A "no" response to the preceding question indicates that there would normally be no significant impact on Shading from the proposed project.

Thresholds of Significance

A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

Sensitive Uses

Sensitive uses include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce.

Shadow Analysis

Building height is proposed to be 1 to 2 stories and a maximum of 29 feet. Therefore, the screening criteria indicates that there would normally be no significant impact on shading from the Project. There are no off-site sensitive uses within the expected shadow projections (the maximum shadow projections are typically 3 times the height of a structure in an arc from the northeast to northwest of the structure). Therefore, no impacts would occur.

Mitigation Measure

MM-AES-1 Lighting

Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

2. AGRICULTURE AND FORESTRY RESOURCES

a) Would the project convert prime farmland, unique farmland, or farmland of statewide importance (farmland), as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California resources agency, to non-agricultural use?

No Impact.

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. 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 designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance categories.[10] Therefore, the Project would have no impact on the conversion of farmland to non-agricultural uses.

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

Less Than Significant Impact.

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.[11]

The Site is zoned A2-1 (Agriculture, Height District 1). This designation allows farming, nurseries, aviaries, and apiaries. It also allows the "keeping of equines, bovines, goats or other domestic livestock (other than swine), poultry, fowl, rabbits, fish or frogs, chinchillas and other small animals…" However, as noted above, the Project Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category and the Site does not currently function as agricultural use.[12] According to historic photographs in the Phase 1 Environmental Site Assessment, by 1967, the former agricultural areas on the southwest side of the Site appear vacant.[13] The Project is proposing equine-keeping residential uses and is surrounded by suburban residential uses. The Project would not result in the conversion of land for agricultural use to non-agricultural use. Further, the

[10] California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, August 22, 2017.

[11] California Department of Conservation, Williamson Act Program, website: http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, accessed August 22, 2017.

[12] California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, August 22, 2017.

[13] Phase I Environmental Site Assessment Report, 10877-10921 Old Santa Susana Pass Road, Partner, March 4, 2016.

Project would not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use because the Project Site is not subject to a Williamson Act contract.[14] Therefore, a less than significant impact with respect to land zoned for agricultural use or under a Williamson Act Contract would occur.

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

No Impact. Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. No impacts related to forest land or timberland would occur.

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

No Impact. The Project Site is completely surrounded by urban uses and infrastructure, and is not forest land. No impact related to the loss of forest land or conversion of forest land would occur.

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

No Impact. A significant impact may occur if a project involves changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the City that is highly urbanized. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land, and such uses are not in proximity to the Project Site. No impacts related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use would occur.

[14] ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2014%20Statewide%20Map/WA_2014_36x42.pdf

3. AIR QUALITY

The section is based, in part, on the following item, included as Appendix B of this MND:

B Air Quality and Greenhouse Gases Analysis, LSA, August 2017.

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

Less Than Significant Impact.

In the case of projects proposed within the City or elsewhere in the South Coast Air Basin (the Basin), the applicable plan is the 2016 Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Management District (SCAQMD). SCAQMD adopted the final 2016 AQMP on March 3, 2017.[15] The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces measures though educational programs or fines, when necessary.

Consistency with Air Quality Plans

SCAQMD Air Quality Management Plan. The proposed residential land uses will neither conflict with the SCAQMD 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 the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The 2016 RTP/SCS accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project would retain the existing, historic Wilson House, subdivide the land into 19 lots and build a new subdivision of nineteen (19) single-family residences (consisting of 18 new residences and 1 retained existing, historic residence). The Project could add 76 residents to the area.[16] This would marginally increase population in the South Coast Air Basin. The Project Site is classified as "Very Low I Residential" in the Community Plan, a classification that allows residential uses. The RTP/SCS' assumptions about growth in the City would accommodate housing, population, and job 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.

[15] http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp

[16] The 2017 Department of Finance data shows that the average household size in Los Angeles is 2.75 persons/household. For a conservative analysis, this assumes 4 persons/household.

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 3.3-1**, the Project is consistent with the applicable policies in the General Plan. As such, the Project's impact on the City's General Plan would be less than significant.

The air quality impacts of residential development on the Project Site are accommodated in the region's emissions inventory for the 2016 RTP/SCS and 2016 AQMP. The Project is therefore not expected to conflict with or obstruct implementation of the AQMP, and any impact on the Plan would be considered less than significant. Similarly, the Project is consistent with the City's General Plan Air Quality Element's policies and would not conflict with its six goals and 15 objectives.

Table 3.3-1
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 Project would minimize particulate emissions during construction through best practices required by SCAQMD Rule 403 (Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent.** The Project would minimize particulate emissions from unpaved facilities through best practices required by SCAQMD Rule 403 (Fugitive Dust).
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Not Applicable.** The Project is a residential development.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Not Applicable.** The Project is a residential development.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Not Applicable.** The Project is a residential development.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Not Applicable.** The Project is a residential development.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The Project does not include special events that would require traffic management.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** The Project would not have 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 Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, 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 Project would be entitled and environmentally cleared at the local level.

Strategy	Project Consistency
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The Project would be infill development that would provide local residents with proximate access to more jobs.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project is a residential development and would allow residents to walk, bike, and use transit along Topanga Canyon and at the Metro Orange Line station on Lassen and Canoga.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The 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 Project is a residential development and would allow residents to walk, bike, and use transit along Topanga Canyon.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Not Applicable.** This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Not Applicable.** This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric of low-emitting fuels.	**Consistent.** The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs.
Source: CAJA Environmental Services, August 2017.	

A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. It fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review due to the air quality plan strategy being based on projections from local General Plans.

The AQMP is based on regional growth projections developed by the SCAG. The Project is a residential development and is not defined as a regionally significant project under CEQA; therefore, it does not meet the SCAG's Intergovernmental Review (IGR) criteria. The proposed uses are consistent with the zoning designation for the Project Site and its surrounding area, which is consistent with the Specific Plan and General Plan of the City. The City's General Plan is consistent with the SCAG Regional Comprehensive Plan (RCP) Guidelines and the SCAQMD AQMP. Pursuant to the methodology provided in Chapter 12 of the 1993 SCAQMD CEQA Air Quality Handbook, consistency with the Basin 2016 AQMP is affirmed when a project (1) does not increase the frequency or severity of an air quality standards violation or cause a new violation; and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented below:

1. The Project would result in short-term construction and long-term pollutant emissions that are less than the CEQA significance emissions thresholds established by the SCAQMD with mitigation incorporated, as demonstrated above; therefore, the Project could not result in an increase in the frequency or severity of any air quality standards violation and will not cause a new air quality standard violation.

2. The CEQA Air Quality Handbook indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities; therefore, the Project is not defined as significant.

Based on the consistency analysis presented above, the Project is consistent with the City's General Plan and the regional AQMP. Impacts would be less than significant.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact.

Both the State of California (State) and the federal government have established health-based ambient air quality standards (AAQS) for seven air pollutants. As detailed in **Table 3.3-2**, these pollutants include ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO2), sulfur dioxide (SO2), particulate matter less than 10 microns in size (PM10), particulate matter less than 2.5 microns in size (PM2.5), and lead. In addition, the State has set standards for sulfates,

hydrogen sulfide (H2S), vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

The California Clean Air Act (CCAA) provides SCAQMD and other air districts with the authority to manage transportation activities at indirect sources. Indirect sources of pollution include any facility, building, structure, or installation, or combination thereof, that attracts or generates mobile source activity that results in emissions of any pollutant. In addition, the local air districts also manage area source emissions that are generated when minor sources collectively emit a substantial amount of pollution (e.g., motor vehicles at an intersection, a mall, and on highways). SCAQMD also regulates stationary sources of pollution throughout its jurisdictional area. Direct emissions from motor vehicles are regulated by the California Air Resources Board (ARB).

Table 3.3-2
Ambient Air Quality Standards

Pollutant	Averaging Period	California [1]		National [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	--	Same as Primary Standard	Ultraviolet Photometry
	8-hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		--		
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry	35 ppm (40 mg/m^3)	--	Non-Dispersive Infrared Photometry
	8-hour	9 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	--	
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Gas Phase Chemiluminescence	53 ppb (100 µg/m^3)	Same as Primary Standard	Gas Phase Chemiluminescence
	1-hour	0.18 ppm (338 µg/m^3)		100 ppb (188 µg/m^3)	--	
Sulfur Dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	Ultraviolet Absorption	--	--	Ultraviolet Pluorescence; Spectrophotometry
	1-hour	0.25 ppm (655 µg/m^3)		75 ppb (196 µg/m^3)	--	
Lead (Pb)	30-day average	1.5 µg/m^3	Atomic Absorption	--	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Calendar Quarter	--		0.15 µg/m^3		

Source: Ambient Air Quality Standards (ARB 2016).
1 California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2 National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once per year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 tg/m3 is equal to or less than 1. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact the EPA for further clarification and current national policies.
3 Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4 Any equivalent measurement method which can be shown to the satisfaction of ARB to give equivalent results at or near the level of the air quality standard may be used.
5 National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6 National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7 Reference method as described by the EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the EPA.

Air Pollution Constituents and Attainment Status

The ARB coordinates and oversees both State and federal air pollution control programs in the State. The ARB oversees activities of local air quality management agencies and maintains air quality monitoring stations throughout the State in conjunction with the EPA and local air districts. The ARB has divided the State into 15 air basins based on meteorological and topographical factors of air pollution. Data collected at these stations are used by the ARB and EPA to classify air basins as attainment, nonattainment, nonattainment-transitional, or unclassified, based on air quality data for the most recent 3 calendar years compared with the AAQS. Attainment areas may be:

Attainment/unclassified (“unclassifiable” in some lists), which have never violated the air quality standard of interest or do not have enough monitoring data to establish attainment or nonattainment status;

Attainment-maintenance (national ambient air quality standards [NAAQS] only), which violated a NAAQS that is currently in use (was nonattainment) in or after 1990, but now attains the standard and is officially redesignated as attainment by the EPA with a maintenance State Implementation Plan (SIP); or

Attainment (usually only for California ambient air quality standards [CAAQS], but sometimes for NAAQS), which have adequate monitoring data to show attainment, have never been nonattainment, or, for NAAQS, have completed the official maintenance period.

Nonattainment areas are imposed with additional restrictions as required by the EPA. The air quality data are also used to monitor progress in attaining air quality standards.

Table 3.3-3 lists the attainment status for the criteria pollutants in the Basin.

Table 3.3-3
Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
O_3 1-hour	Nonattainment	N/A
O_3 8-hour	Nonattainment	Extreme Nonattainment
PM_{10}	Nonattainment	Attainment/Maintenance
$PM_{2.5}$	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Unclassified/Attainment (1-hour) / Attainment/Maintenance (Annual)
SO_2	Attainment	Unclassified/Attainment
Lead	Nonattainment[1]	Nonattainment[1]
All others	Attainment/Unclassified	Attainment/Unclassified

Source: California Air Resources Board. Air Quality Standards and Area Designations. http://www.arb.ca.gov/desig/desig.htm, accessed August 2017.
[1] Except in Los Angeles County.
CO = carbon monoxide; N/A = not applicable; NO2 = nitrogen dioxide; O3 = ozone; PM10 = particulate matter less than 10 microns in size; PM2.5 = particulate matter less than 2.5 microns in size; SO2 = sulfur dioxide

Ozone. O_3 (smog) is formed by photochemical reactions between NOX and reactive organic gases (ROGs) rather than being directly emitted. O_3 is a pungent, colorless gas typical of Southern California smog. Elevated O_3 concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, the elderly, and young children. O_3 levels peak during summer and early fall. The entire Basin is designated as a nonattainment area for the State 1-hour and 8-hour O_3 standards. The EPA has officially designated the status for most of the Basin regarding the 8-hour O_3 standard as “extreme nonattainment,” which means the Basin has until 2024 to attain the federal 8-hour O_3 standard.

Carbon Monoxide. CO is formed by the incomplete combustion of fossil fuels, almost entirely from automobiles. It is a colorless, odorless gas that can cause dizziness, fatigue, and impairments to central nervous system functions. The entire Basin is in attainment for the State standards for CO. The Basin is designated as an “attainment/maintenance” area under the federal CO standards.

Nitrogen Oxides. NO_2, a reddish brown gas, and nitric oxide (NO), a colorless, odorless gas, are formed from fuel combustion under high temperature or pressure. These compounds are referred to as nitrogen oxides, or NO_X. NO_X is a primary component of the photochemical smog reaction. It also contributes to other pollution problems, including a high concentration of fine particulate matter ($PM_{2.5}$), poor visibility, and acid deposition (i.e., acid rain). NO_2 decreases lung function and may reduce resistance to infection. The entire Basin is designated as

nonattainment for the State NO_2 standard and as an "attainment/maintenance" area under the federal NO_2 standard.

Sulfur Dioxide. SO_2 is a colorless, irritating gas formed primarily from incomplete combustion of fuels containing sulfur. Industrial facilities also contribute to gaseous SO_2 levels. SO_2 irritates the respiratory tract, can injure lung tissue when combined with fine particulate matter, and reduces visibility and the level of sunlight. The entire Basin is in attainment with both federal and State SO_2 standards.

Lead. Lead is found in old paints and coatings, plumbing, and a variety of other materials. Once in the bloodstream, lead can cause damage to the brain, nervous system, and other body systems. Children are highly susceptible to the effects of lead. The Los Angeles County portion of the Basin was redesignated as nonattainment for the State and federal standards for lead in 2010.

Particulate Matter. Particulate matter is the term used for a mixture of solid particles and liquid droplets found in the air. Coarse particles (PM_{10}) derive from a variety of sources, including windblown dust and grinding operations. Fuel combustion and resultant exhaust from power plants and diesel buses and trucks are primarily responsible for $PM_{2.5}$ levels. Fine particles can also be formed in the atmosphere through chemical reactions. PM_{10} can accumulate in the respiratory system and aggravate health problems such as asthma. The EPA's scientific review concluded that $PM_{2.5}$, which penetrates deeply into the lungs, is more likely than PM_{10} to contribute to the health effects listed in a number of recently published community epidemiological studies at concentrations that extend well below those allowed by the current PM_{10} standards. These health effects include premature death and increased hospital admissions and emergency room visits (primarily among the elderly and individuals with cardiopulmonary disease); increased respiratory symptoms and disease (in children and individuals with cardiopulmonary disease such as asthma); decreased lung function (particularly in children and individuals with asthma); and alterations in lung tissue and structure and in respiratory tract defense mechanisms. The Basin is designated nonattainment for the federal and State $PM_{2.5}$ standards and State PM_{10} standard, and attainment/maintenance for the federal PM_{10} standard.

Volatile Organic Compounds. Volatile organic compounds (VOCs; also known as ROGs, and reactive organic compounds [ROCs]) are formed from the combustion of fuels and the evaporation of organic solvents. VOCs are not defined as criteria pollutants; however, because VOCs accumulate in the atmosphere more quickly during the winter, when sunlight is limited and photochemical reactions are slower, they are a prime component of the photochemical smog reaction. There are no attainment designations for VOCs.

Sulfates. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized to SO2 during the combustion process and subsequently is converted to sulfate compounds in the atmosphere. The conversion of SO2 to sulfates takes place comparatively rapidly and completely in urban

areas of the State due to regional meteorological features. The entire Basin is in attainment for the State standard for sulfates.

Hydrogen Sulfide. H_2S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. In addition, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. In 1984, an ARB committee concluded that the ambient standard for H2S is adequate to protect public health and to significantly reduce odor annoyance. The entire Basin is unclassified for the State standard for H2S.

Visibility-Reducing Particles. Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size, and chemical composition, and can be made up of many different materials, such as metals, soot, soil, dust, and salt. The statewide standard is intended to limit the frequency and severity of visibility impairment due to regional haze. The entire Basin is unclassified for the State standard for visibility-reducing particles.

Hazardous Air Pollutants

The public's exposure to toxic air contaminants (TACs) is a significant environmental health issue in the State. In 1983, the State Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health. The Health and Safety Code defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the Federal Act (United States Code [USC] Title 42, Section 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency (CalEPA), acting through the ARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

The State regulates TACs primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act sets forth a formal procedure for the ARB to designate substances as TACs. Once a TAC is identified, the ARB adopts an "airborne toxics control measure" for sources that emit designated TACs. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate toxics best available control technology (T-BACT) to minimize emissions.

Air toxics from stationary sources are also regulated in the State under the Air Toxics "Hot Spot" Information and Assessment Act of 1987. Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities are required to perform a health risk assessment and, if specific thresholds are exceeded, to communicate the results to the public in the form of notices

and public meetings. To date, the ARB has designated nearly 200 compounds as TACs. Additionally, the ARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (DPM).

Local Air Quality

The SCAQMD, together with the ARB, maintains ambient air quality monitoring stations in the Basin. The air quality monitoring station closest to the site is the Reseda station, which monitors air pollutant data for CO, hourly and 8-hour ozone, $PM_{2.5,}$ and NO_2. The rest of the criteria pollutants were obtained from the Los Angeles-Westchester station. The air quality trends from these two stations are used to represent the ambient air quality in the project area. The ambient air quality data in **Table 3.3-4** show that CO, NO_2, SO_2, 24-hour PM_{10}, 24-hour $PM_{2.5}$, annual average $PM_{2.5,}$ and CO levels are below the applicable State and federal standards, and 24-hour $PM_{2.5}$ is below the federal standard. The State 1-hour O_3 standard was exceeded zero times per year in the past 3 years. The federal 8-hour O_3 standard was exceeded 23 to 32 days per year in the past 3 years. The annual average PM_{10} state standard was exceeded in the past 3 years.

Table 3.3-4
Ambient Air Quality Data In Project Vicinity

Pollutant	Pollutant Concentration & Standards	2014	2015	2016
Carbon Monoxide – Reseda Station	Maximum 1-hour Concentration (ppm)	3.7	3	2.4
	Days > 20 ppm (State 1-hour standard)	0	0	0
	Maximum 8-hour Concentration (ppm)	3	2.5	1.9
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Ozone – Reseda Station	Maximum 1-hour Concentration (ppm)	0.116	0.119	0.122
	Days > 0.12 ppm (State 1-hour standard)	0	0	0
	Maximum 8-hour Concentration (ppm)	0.092	0.094	0.098
	Days > 0.07 ppm (Federal 8-hour standard)	ND	ND	ND
PM_{10} – Los Angeles Westchester Station	Maximum 24-hour Concentration (µg/m^3)	46	42	43
	Days > 50 µg/m^3 (State 24-hour standard)	0	0	0
	Days > 150 µg/m^3 (Federal 24-hour standard)	0	0	0
	Annual Arithmetic average concentration	22.1	21.2	21.6
$PM_{2.5}$ – Reseda Station	Maximum 24-hour Concentration (µg/m^3)	27.2	36.8	30.0
	Days > 35 µg/m^3 (Federal 24-hour standard)	0	ND	0
	Annual Arithmetic average concentration	10.5	8.8	9.2
Nitrogen Dioxide – Reseda Station	Maximum 1-hour Concentration (ppm)	0.059	0.073	0.056
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
	Annual arithmetic average concentration	0.012	0.013	0.013
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
Sulfur Dioxide - Reseda Station	Maximum 24-hour Concentration (ppm)	0.015	0.015	0.010
	Days > 0.04 ppm (State 24-hour standard)	0	0	0
	Days > 0.14 ppm (Federal 24-hour standard)	0	0	0
	Annual arithmetic average concentration	0.00025	0.00045	0.00055

Source: United States Environmental Protection Agency. AirData: 2013–2015 Air Quality Data. Website: http://www.epa.gov/airquality/airdata, accessed August 2017.
Source: California Air Resources Board. iADAM: Air Quality Data Statistics: http://www.arb.ca.gov/adam, accessed August 2017.
hr = hour; g/m3 = micrograms per cubic meter; PM2.5 = particulate matter less than 2.5 microns in size PM10 = particulate matter less than 10 microns in size; ppm = parts per million

Regulatory Settings

Federal Regulations/Standards

Pursuant to the federal Clean Air Act (CAA) of 1970, the EPA established the NAAQS. The NAAQS were established for six major pollutants, termed “criteria” pollutants. Criteria pollutants are defined as those pollutants for which the federal and State governments have established AAQS, or criteria, for outdoor concentrations in order to protect public health. Data collected at permanent monitoring stations are used by the EPA to classify regions as “attainment” or “nonattainment,” depending on whether the regions met the requirements stated in the primary NAAQS. Nonattainment areas are imposed with additional restrictions as required by the EPA. The EPA has designated the Southern California Association of Governments (SCAG) as the Metropolitan Planning Organization (MPO) responsible for ensuring compliance with the requirements of the CAA for the Basin.

In an effort to help federal agencies ensure the integrity of their environmental reviews and promote sound governmental decision making, the Council on Environmental Quality (CEQ) issued on January 14, 2011, final guidance on the “Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact.” This guidance was developed as part of CEQ’s effort to modernize and reinvigorate federal agency implementation of the National Environmental Policy Act (NEPA). The EPA established new national air quality standards for ground-level O3 and PM2.5 in 1997. On May 14, 1999, the Court of Appeals for the District of Columbia Circuit issued a decision ruling that the CAA, as applied in setting the new public health standards for O3 and PM2.5, was unconstitutional as an improper delegation of legislative authority to the EPA. On February 27, 2001, the United States Supreme Court upheld the way the government sets air quality standards under the CAA. The court unanimously rejected industry arguments that the EPA must consider financial cost, as well as health benefits, in writing standards. The justices also rejected arguments that the EPA took too much lawmaking power from Congress when it set tougher standards for O3 and soot in 1997. Nevertheless, the court threw out the EPA’s policy for implementing new O3rules, saying that the agency ignored a section of the law that restricts its authority to enforce such rules.

In April 2003, the EPA was cleared by the White House Office of Management and Budget (OMB) to implement the 8-hour ground-level O3 standard. The EPA issued the proposed rule implementing the 8-hour O3 standard in April 2003. The EPA completed final 8-hour nonattainment status on April 15, 2004. The EPA revoked the 1-hour O3 standard on June 15, 2005, and lowered the 8-hour O3 standard from 0.08 ppm to 0.075 ppm on April 1, 2008. The EPA issued the final PM2.5 implementation rule in fall 2004. The EPA lowered the 24-hour PM2.5 standard from 65 to 35 µg/m3 and revoked the annual PM10 standard on December 17, 2006. The EPA issued final designations for the 2006 24-hour PM2.5 standard on December 12, 2008. With respect to global climate change, the United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States

Supreme Court ruled that the EPA has the authority to regulate CO2 emissions under the CAA. While there currently are no adopted federal regulations for the control or reduction of GHG emissions, the EPA commenced several actions in 2009 that are required to implement a regulatory approach to GCC.

On September 30, 2009, the EPA announced a proposal that focuses on large facilities emitting over 25,000 tons of GHG emissions per year. These facilities would be required to obtain permits that would demonstrate they are using the best practices and technologies to minimize GHG emissions. On December 7, 2009, the EPA Administrator signed a final action under the CAA, finding that six GHGs (CO2, CH4, N2O, HFCs, PFCs, and SF6) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to GCC. This EPA action does not impose any requirements on industry or other entities. However, the findings are a prerequisite to finalizing the GHG emission standards for light-duty vehicles mentioned below. On April 1, 2010, the EPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a final joint rule to establish a national program consisting of new standards for model year 2012 through 2016 light-duty vehicles that will reduce GHG emissions and improve fuel economy. The EPA is finalizing the first-ever national GHG emissions standards under the CAA, and NHTSA is finalizing Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. The EPA GHG standards require these vehicles to meet an estimated combined average emissions level of 250 grams of CO2 per mile in model year 2016, equivalent to 35.5 miles per gallon (mpg).

The Current Administration

President Trump and USEPA Secretary Scott Pruitt have stated their intent to halt various federal regulatory activities to reduce GHG emission. California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives. The timing and consequences of these types of federal decisions and potential responses from California and other states are speculative at this time.

State Regulations/Standards

In 1967, the State Legislature passed the Mulford-Carrell Act, which combined two Department of Health bureaus, the Bureau of Air Sanitation and the Motor Vehicle Pollution Control Board, to establish the ARB. Since its formation, the ARB has worked with the public, the business sector, and local governments to find solutions to the State's air pollution problems. California adopted the CCAA in 1988. The ARB administers CAAQS for the 10 air pollutants designated in the CCAA. These 10 State air pollutants are the six criteria pollutants designated by the federal CAA as well as visibility-reducing particulates, H2S, sulfates, and vinyl chloride. The ARB identified DPM emissions as TACs in August 1998. Following the identification process, the ARB was required by law to determine whether there is a need for further control. In September 2000, the ARB adopted the Diesel Risk Reduction Plan (Diesel RRP), which recommends many

control measures to reduce the risks associated with DPM and to achieve goals of 75 percent DPM reduction by 2010 and 85 percent by 2020.

Regional Thresholds for Construction Emissions

Projects in the Basin with construction-related emissions that exceed any of these emission thresholds are considered significant under the SCAQMD guidelines. The following CEQA significance thresholds for construction emissions have been established for the Basin:

75 pounds per day (lbs/day) of VOC

100 lbs/day of NO_X

550 lbs/day of CO

150 lbs/day of PM_{10}

55 lbs/day of $PM_{2.5}$

150 lbs/day of sulfur oxides (SO_X)

Regional Thresholds for Operational Emissions

Projects in the Basin with operational emissions that exceed any of these emission thresholds are considered significant under the SCAQMD guidelines. The following CEQA significance thresholds for operational emissions have been established for the Basin:

55 lbs/day of VOC

55 lbs/day of NO_X

550 lbs/day of CO

150 lbs/day of PM_{10}

55 lbs/day of $PM_{2.5}$

150 lbs/day of SO_X

Local Microscale Concentration Standards. The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. If ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or federal standard, project emissions are considered significant if they increase 1-hour CO concentrations by 1.0 ppm or more or 8-hour CO concentrations by 0.45 ppm or more. The following are applicable local emission concentration standards for CO:

California State 1-hour CO standard of 20.0 ppm

California State 8-hour CO standard of 9.0 ppm

Localized Impacts Analysis

SCAQMD published its Final Localized Significance Threshold Methodology in June 2003 and updated it in July 2008 (SCAQMD 2003), recommending that all air quality analyses include an assessment of both construction and operational impacts on the air quality of nearby sensitive receptors. Localized significance thresholds (LSTs) represent the maximum emissions from a project site of up to 5 acres that are not expected to result in an exceedance of the NAAQS or CAAQS. LSTs are based on the ambient concentrations of that pollutant within the project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. For this project, the appropriate SRA for the LST analysis is the West San Fernando Valley area (SRA 6).

If the total acreage disturbed is less than or equal to 5 acres per day, then the SCAQMD's screening look-up tables can be used to determine if a project has the potential to result in a significant impact. In the case of CO and NO2, because ambient levels are below the NAAQS and CAAQS, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM10 and PM2.5, both of which are nonattainment pollutants (SCAQMD 2006). For these two, the significance criteria are the pollutant concentration thresholds presented in SCAQMD Rules 403 and 1301. The Rule 403 threshold of 10.4 µg/m3 applies to construction emissions. The Rule 1301 threshold of 2.5 µg/m3 applies to operational activities. Based on the SCAQMD recommended methodology and the construction equipment planned, no more than 4 acres would be disturbed on any one day; thus, the 4-acre LSTs have been used for construction emissions. On-site operational emissions would occur from stationary and mobile sources. However, on-site vehicle emissions are the largest source of emissions, and the on-site travel routes in the parking lot for the Project would occupy up to 5 acres of the surface area. Therefore, the 5-acre thresholds would apply during project operations:

Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality. Existing residences are located immediately to the south of the project boundary. SCAQMD LST Methodology (SCAQMD 2003) specifies, "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." Therefore, the following emissions thresholds apply during project construction and operation:

Construction LSTs, 4-acre, 82-foot (ft) (25 m) distance

196 lbs/day of NOX
987 lbs/day of CO
9.3 lbs/day of PM10
5.3 lbs/day of PM2.5

Operation LSTs, 5-acre, 82 ft (25 m) distance

221 lbs/day of NOX
1,158 lbs/day of CO
3 lbs/day of PM10
2 lbs/day of PM2.5

Construction Impacts

Equipment Exhausts and Related Construction Activities

Construction activities produce combustion emissions from various sources such as grading, site preparation, utility engines, tenant improvements, and motor vehicles transporting the construction crew. Exhaust emissions from construction activities envisioned on site would vary daily as construction activity levels change. The use of construction equipment on site would result in localized exhaust emissions. **Table 3.3-5** lists the tentative project construction schedule for the Project based on a probable start date, a planned completion in 2019, and the assumption that the architectural coatings would be applied during the latter portion of the building construction phase. **Table 3.3-6** lists the estimated construction equipment that would be used during project construction as estimated by CalEEMod default values.

Table 3.3-5
Proposed Construction Schedule

Phase	Duration	Notes
1. Demolition	22 days	
2. Grading	31 days	
3. Trenching	54 days	
4. Building Construction	257 days	
5. Architectural Coating	116 days	Overlap with final 5 months of construction
6 Paving	20 days	Overlap with final 1 month of construction
Source: Estimated from site plan and CalEEMod defaults (2017).		

The most recent version of the CalEEMod model (Version 2016.3.1) was used to calculate the construction emissions. The construction emissions are shown **Table 3.3-7**. The emissions rates shown in the table are from the CalEEMod output tables listed as “Mitigated Construction,” even though the only measures that have been applied to the analysis are the required construction emissions control measures, or standard conditions. They are also the combination of the on- and off-site emissions. Since no exceedances of any criteria pollutants are expected, no significant impacts would occur for project construction.

Fugitive Dust

Fugitive dust emissions are generally associated with land clearing and exposure of soils to the air and wind, as well as cut-and-fill grading operations. Dust generated during construction varies substantially on a project-by-project basis, depending on the level of activity, the specific operations, and weather conditions at the time of construction. The Project will be required to comply with SCAQMD Rules 402 and 403 to control fugitive dust.

Table 3.3-6
Diesel Construction Equipment Utilized by Construction Phase

Construction Phase	Off-Road Equipment Type	Unit Amount	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	1	8	81	0.73
	Excavators	3	8	162	0.38
	Rubber-tired Dozers	2	8	255	0.4
Site Preparation	Rubber-tired dozers	3	8	255	0.4
	Tractors/Loaders/Backhoes	4	8	97	0.37
Grading	Excavators	2	8	162	0.38
	Graders	1	8	174	0.41
	Rubber-tired dozers	1	8	255	0.4
	Scrapers	2	8	361	0.48
	Tractors/Loaders/Backhoes	2	8	361	0.37
Building Construction	Cranes	1	7	226	0.29
	Forklifts	3	8	89	0.2
	Generator Sets	1	8	84	0.74
	Tractors/Loaders/Backhoes	3	7	97	0.37
	Welders	1	8	46	0.45
Architectural Coating	Air Compressors	1	6	78	0.48
Paving	Pavers	2	8	125	0.42
	Paving Equipment	2	8	130	0.36
	Rollers	2	8	80	0.38

Compiled by LSA Associates, Inc. (August 2017).

Architectural Coatings

Architectural coatings contain VOCs that are similar to ROCs and are part of the O_3 precursors. Based on the proposed construction schedule, building construction, application of architectural coatings and paving on a peak construction day is estimated to result in 9.4 lbs/day of VOC. Therefore, this VOC emission will not exceed the SCAQMD VOC threshold of 75 lbs/day.

Table 3.3-7 lists total construction emissions (i.e., fugitive dust emissions and construction equipment exhausts). The Project would incorporate a number of feasible control measures that can be reasonably implemented to significantly reduce PM_{10} emissions from construction.

Table 3.3-7
Short-Term Regional Construction Emissions

	Total Regional Pollutant Emissions (lbs/day)							
Construction Phase	**ROG**	**NOx**	**CO**	**SOx**	**Fugitive PM10**	**Exhaust PM10**	**Fugitive PM2.5**	**Exhaust PM2.5**
Demolition	3.8	38.9	23.2	0	0.3	1.9	0.1	1.8
Site Preparation	5.4	65.0	37.3	0.1	4.4	2.7	1.8	2.4
Grading	1.8	16.6	14.0	0	0.2	1.1	0	1.1
Building Construction	2.7	23.7	18.0	0	0.1	1.5	0	1.4
Architectural Coating	5.2	2.0	1.9	0	0.0	0.2	0	0.2
Paving	9.4	15.3	15.4	0	0.2	0.8	0	0.8
Peak Daily	**75**	**65.0**	**37.2**	**0.1**	**7.1**		**4.2**	
SCAQMD Thresholds?	**75**	**100**	**550**	**150**	**150**		**55**	
Significant Emissions?	**No**	**No**	**No**	**No**	**No**		**No**	

Peak daily ROG emissions occur during overlap of building construction, architectural coatings and paving.
Source: Compiled by LSA Associates, Inc. (August 2017).

Localized Impacts Analysis

SCAQMD has issued guidance on applying CalEEMod modeling results to localized impacts analyses.[17] Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality. **Table 3.3-8** shows that the construction emission rates would not exceed the LSTs for the adjacent multifamily residences less than 82 ft (25 m) from the Project Site.

Table 3.3-8
Construction Localized Impacts Analysis

Emissions Source	Pollutant Emissions (lbs/day)			
	NOx	**CO**	**PM10**	**PM2.5**
On-Site Emissions	65	37.2	6.5	4.0
LST Thresholds	**196**	**987**	**9.3**	**5.3**
Significant Emissions?	**No**	**No**	**No**	**No**
Source: Compiled by LSA Associates, Inc. (August 2017).				

Standard Conditions

Construction

SCAQMD Rule 403 addresses fugitive dust emissions of PM_{10} and $PM_{2.5}$, 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.

Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.

In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

The applicable CalRecycle Sustainable (Green) Building Program Measures are:

> Recycle/reuse at least 50 percent of construction materials (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard).

[17] South Coast Air Quality Management District. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significancethresholds/caleemod-guidance.pdf?sfvrsn=2 (accessed August 2017).

Use “green building materials,” such as those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way, for at least 10 percent of the project.

Operations

The Project is required to comply with Title 24 of the California Code of Regulations (CCR) established by the CEC regarding energy conservation and green building standards. The project applicant shall incorporate the following in building plans:

Low-emission water heaters shall be used. Solar water heaters are encouraged.

Exterior windows shall utilize window treatments for efficient energy conservation.

These measures will result in reduced emissions during the construction and operation phases of the Project.

Construction of the Project is not expected to produce any local violation of air quality standards or contribute substantially to an existing or projected air quality violation.

Construction Health Risk Impacts

Construction of the Project would include the use of diesel-powered equipment that releases DPM, a toxic air contaminant with known carcinogenic and chronic health effects (Office of Environmental Health Hazard Assessment and American Lung Association of California 2002). For construction analyses, the emissions of DPM will be included in the exhaust PM10 emissions. **Table 3.3-7** shows that the exhaust PM10 emissions from construction would vary from 3.3 lbs/day to 0.17 lb/day during the different phases. This DPM emissions rate is very low while it is occurring, and to determine the carcinogenic and chronic health risk levels, this emissions rate would be spread over a 30-year exposure period. This low average DPM emissions rate, combined with the fact that the nearest sensitive receptors are 25 m from the Project Site, means that the construction health risk levels are very low and well below thresholds of significance.

Construction Emissions Conclusions

Table 3.3-7 and **Table 3.3-8** show that daily regional construction emissions would not exceed the daily thresholds of any criteria pollutant emission thresholds established by the SCAQMD and that, during construction, there will be no locally significant impacts.

Long-Term Project Operational Emissions

Long-term air pollutant emission impacts are those associated with stationary sources and mobile sources involving any project-related changes. The Project would result in net increases in both stationary- and mobile-source emissions. The stationary-source emissions would come from many sources, including the use of consumer products, landscape equipment, general energy, and solid waste. Based on trip generation factors included in the Institute of

Transportation Engineers (ITE) Trip Generation Manual, Ninth Edition, which are also provided in the trip generation analysis prepared for the Project (Hirsh/Green Transportation Consulting, Inc. 2017), the project's daily trips are entered in the CalEEMod model. Long-term operational emissions associated with the existing site and the Project are shown in **Table 3.3-9**

Area sources include architectural coatings, consumer products, hearths, and landscaping. Energy sources include natural gas consumption for heating and cooking. **Table 3.3-9** shows that the increase of all criteria pollutants as a result of the Project would not exceed the corresponding SCAQMD daily emission thresholds for any criteria pollutants. None of the SCAQMD emission thresholds for criteria pollutants would be exceeded by the project-related increases. Therefore, project-related long-term air quality impacts would be less than significant.

Table 3.3-9
Opening Year Regional Operations Emissions

	Pollutant Emissions (lbs/day)					
Source	**ROG**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Existing						
Area Sources	0. 2	0	0.2	0	0	0
Energy Sources	0	0	0	0	0	0
Mobile Sources	0.1	0.2	0.6	0	0.2	0
Total Project Emissions	0.2	0.3	0.8	0	0.2	0
Proposed						
Area Sources	2	0.3	1.7	0	0	0
Energy Sources	0	0.1	0.1	0	0	0
Mobile Sources	0.4	2.1	6.0	0	1.4	0.4
Total Project Emissions	2.4	2.5	7.7	0	1.4	0.4
Net New Emissions	2.2	2.2	6.9	0	1.2	0.4
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Significant?	No	No	No	No	No	No
Source: Compiled by LSA Associates, Inc. (August 2017).						

Localized Impacts Analysis

Table 3.3-10 shows the calculated emissions for the proposed operational activities compared with the appropriate LSTs. By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod model outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in **Table 3.3-10** include all on-site project-related stationary sources and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related new vehicle traffic that will occur on site. A total of 5 percent is considered conservative as the average trip lengths assumed are 14.7 miles (mi) for home to work, 5.9 miles for home to shopping, and 8.7 miles for other types of trips. It is unlikely that the average on-site distance driven will be even 1,000 ft, which is approximately 2.2 percent of the total miles traveled. Considering the total trip length included in the CalEEMod model, the 5 percent assumption is conservative.

Table 3.3-10 shows that the operational emission rates would not exceed the PM10 and PM2.5 LSTs for the existing sensitive receptors located within the 25 meters distance for LST analyses.

Therefore, the proposed operational activity would not result in a locally significant air quality impact.

Table 3.3-10
Long-term Operational LST

Emissions Source	Pollutant Emissions (lbs/day)			
	NOx	**CO**	**PM_{10}**	**$PM_{2.5}$**
On-Site Emissions	0.4	2.	0.1	0.1
LST Thresholds	**221**	**1,158**	**31**	**2**
Significant Emissions?	**No**	**No**	**No**	**No**
Source: Compiled by LSA Associates, Inc. (August 2017). Source Receptor Area – West San Fernando Valley Area, 5 acres, receptors at 25 meters, on-site traffic 5 percent of total.				

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 releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. A project's construction impacts could be considered cumulatively considerable if it substantially contributes to cumulative air quality violations when considering other projects that may undertake concurrent construction activities. Construction of the Project would not contribute significantly to cumulative emissions of any non-attainment regional pollutants. For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. Similarly, regional emissions of PM_{10} and $PM_{2.5}$ would not exceed mass thresholds established by the SCAQMD. Therefore, construction emissions impacts on regional criteria pollutant emissions would be considered less than significant.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. Construction of the Project itself would not produce cumulatively considerable emissions of localized nonattainment pollutants PM_{10} and $PM_{2.5}$, as the anticipated emissions would not exceed LST thresholds set by the SCAQMD. This is considered a less than significant impact.

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The Project is a residential development that would not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM_{10} and $PM_{2.5}$ would be minimal. Likewise, existing land uses in the area include land uses that do not produce substantial emissions of localized nonattainment pollutants. Long-term operation of the

Project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant.

d) Expose sensitive receptors to substantial pollutant concentrations?

No Impact.

Long-Term Microscale (CO Hot Spot) Analysis

Vehicular trips associated with the Project would contribute to congestion at intersections and along roadway segments in the project vicinity. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the Project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (residents, schoolchildren, the elderly, hospital patients, etc.). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Reseda Monitoring Station, the closest station with complete monitored CO data, showed a highest recorded 1-hour concentration of 3.7 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 3.0 ppm (the State standard is 9 ppm) during the past 3 years (Table E). The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

Reduced speeds and vehicular congestion at intersections results in increased CO emissions. As described in the Trip Generation Assessment Letter prepared for the Project (Hirsch/Green 2017), all study area intersections currently operate at satisfactory level of service (LOS). With the addition of the project in the existing setting, all study area intersections would continue to operate at satisfactory LOS. Therefore, the project can be implemented in an existing setting with no significant peak-hour intersection impacts. Given the extremely low level of CO concentrations in the project area and the lack of traffic impacts at any intersections, project-related vehicles are not expected to contribute significantly to CO concentrations exceeding the State or federal CO standards. Because no CO hot spot would occur, there would be no project-related impacts on CO concentrations.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact.

Heavy-duty equipment in the project area during construction would emit odors, primarily from equipment exhaust. However, the construction activity would cease to occur after individual construction is completed. The Project would introduce residential land uses to the area but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners).

The area allows for an overlay for horse-keeping. This overlay is regulated by ZI-2438, which requires building permit applicants to submit an Equine Keeping Checklist Form to LADBS prior to issuance of a Building Permit. This checklist process is intended to define requirements for horse-keeping in the "K" District and other zones that accommodate horse keeping, including RA. This Checklist process provides equine keeping structure and enclosure design requirements and establishes minimum distances between horse keeping areas and residential living space.[18] In addition, the development includes a large amount of open space to facilitate horse-keeping with sufficient distance between homes and horse paddocks to allow odors to dissipate into the air. Since the existing environmental setting allows horses and there are active horse trails in the area, and assuming compliance with the required LADBS requirements,[19] horse odor would be less than significant.

In addition, SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses. As a result, any odor impacts from the Project would be considered less than significant.

[18] http://zimas.lacity.org/documents/zoneinfo/ZI2438.pdf

[19] http://www.ladbs.org/docs/default-source/publications/information-bulletins/zoning-code/equinekeeping-ib-p-zc2014-018.pdf

4. BIOLOGICAL RESOURCES

The section is based on the following items, included as Appendix C of this MND:

C-1 Evaluation of Biological Resources, LSA, August 23, 2016.

C-2 Results of Daytime Bat Habitat Assessment and Nighttime Bat Emergency Survey, LSA, August 30, 2016.

C-3 Protected Tree Report, The Tree Resource, November 6, 2018.

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

Less Than Significant Impact with Mitigation.

A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife[20] (CDFW) or the U.S. Fish and Wildlife Service (USFWS).

Methodology

LSA examined multiple database sources, including the California Natural Diversity Data Base RareFind and the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants, to assist in determining the existence or potential occurrence of any special-status plant and/or animal species[21] or sensitive natural communities in or immediately adjacent to the study area. On July 20, 2016, LSA conducted a reconnaissance-level survey of the study area to identify and document the occurrence or likely occurrence of any biological resources (i.e., species and/or habitats) of particular interest or concern.

Vegetation

Much of the project area consists of ruderal nonnative grassland and ornamental landscape vegetation. The ruderal grassland is heavily disturbed and frequently littered with scattered trash or debris and consists primarily of nonnative grasses, such as oats (Avena spp.), bromes (Bromus spp.) hare barley (Hordeum murinum ssp. leporinum), and Bermuda grass (Cynodon dactylon), and herbaceous weeds, including black mustard (Brassica nigra), London rocket (Sisymbrium irio), telegraph weed (Heterotheca grandiflora), and Russian thistle (Salsola tragus). The trees occurring in the study area consist of an assortment of native and nonnative

[20] Effective January 1, 2013, the California Department of Fish and Game changed its name to the California Department of Fish and Wildlife: http://www.dfg.ca.gov/about/namechange.html.

[21] Any plant or animal species listed or proposed for listing by federal and/or State resource agencies, as well as plant or animal species not listed or proposed for listing by any resource agency but having some other special designation from a resource agency or a recognized conservation organization (e.g., CNPS), are considered “special-status species” for the purposes of this evaluation.

species. The predominant native trees include coast live oak (Quercus agrifolia var. agrifolia) and blue elderberry (Sambucus nigra ssp. caerulea), and the predominant nonnative trees include Peruvian pepper (Schinus molle), common olive (Olea europaea), and various ornamental palms. Ornamental landscape is common throughout the study area and is dominated by exotic plants, primarily trees and shrubs, which have been artificially planted along the property boundaries and adjacent to structures for aesthetic purposes. Although some native plants (e.g., coast live oak, blue elderberry, telegraph weed, jimsonweed [Datura wrightii]) are scattered about, there are no native-dominated plant communities within the study area. Furthermore, there are no sensitive natural communities, as designated by the CDFW, within the study area. In addition, the Project would not result in the fragmentation or isolation of any native habitat. Therefore, the Project impacts to existing vegetation in the study area during proposed construction would not be considered significant.

The intrusion of invasive exotic plant species from suburban landscaping can adversely affect adjacent open space areas, especially those comprising native habitat. Therefore, LSA recommends strictly prohibiting the use of invasive exotic plant species as part of the landscape plan for the Project. The invasive plants to be prohibited from use in landscaping should include any of the plant species rated as “High” or “Moderate” in the California Invasive Plant Inventory Database, which is maintained by the California Invasive Plant Council (Cal-IPC). This is included as **Project Design Feature PDF-Bio-1**.

The Landscape Plan does not include any plant species listed in California Invasive Plant Inventory Database with a 'High', 'Moderate' or 'Limited' rating. The Landscape Plan includes low water plants consistent with “LADWP California Friendly Landscape List.”

Wildlife

Some of the animal species observed or otherwise detected in the project area during the site visit included western fence lizard (Sceloporus occidentalis), phainopepla (Phainopepla nitens), black phoebe (Sayornis nigricans), acorn woodpecker (Melanerpes formicivorus), western kingbird (Tyrannus verticalis), American crow (Corvus brachyrhynchos), house finch (Haemorhous mexicanus), California ground squirrel (Spermophilus beecheyi), and pocket gopher (Thomomys bottae). All of these animal species and many others that were not observed but are expected to occur on site are animals typically associated with equestrian residential areas such as those that exist in and adjacent to the project area. Bat species could potentially nest or roost in the trees and/or buildings that occur in the study area. Likewise, although no active nesting by birds was observed during the site survey, the various trees and shrubs in and adjacent to the study area could potentially support nesting birds, including raptors. This is particularly true of the various tall trees, which could support raptor nests as well as other bird species. The study area in its present condition, including the concrete lined flood control channel, could provide a means for some terrestrial animal species to move locally and regionally between the various open space areas in the general vicinity. Although some animal species adapted to such suburban conditions may periodically disperse into the study area, it is not expected to function as a wildlife movement corridor or special linkage.

The adverse effects of nuisance noise from Project activities would be temporary and, with the possible exception of nesting birds, would not constitute a significant adverse impact to wildlife on site or in the adjacent areas. However, these potential impacts to nesting birds can be minimized or even avoided by implementing **Mitigation Measure MM-Bio-1**.

Given the existing conditions in the study area (e.g., tall trees, structures, water source) are suitable for supporting bat species, LSA recommended having a qualified bat specialist conduct a daytime bat habitat assessment and a focused nighttime bat survey to determine if any bats forage and/or roost on site and, if present, to identify what bat species are present. The results of the bat survey are below.

Bat Assessment and Survey

The daytime assessment was conducted to locate potential bat roosting sites in various structures, mature trees, and any other potential roosting areas present throughout the study area, while the nighttime emergence survey was performed immediately following the daytime assessment to allow for the detection of any bats that might emerge from potential roosting sites shortly after dusk and to identify any bats present with acoustic monitoring. Furthermore, this assessment and nighttime survey were performed during the recognized bat maternity season (April 1–August 31 in southern California) to determine whether any maternity colonies or maternity roost sites are present in the study area.

No bats were observed emerging from or entering any of the various structures during the nighttime survey. The majority of bats observed and identified acoustically were canyon bats, which commonly roost in rock outcrops and boulders such as those found in the hillsides adjacent to the study area and only occasionally roost in human-made structures such as buildings. The other bat species observed and identified during the nighttime survey included small-footed myotis, Mexican free-tailed bat, big brown bat, California myotis, and possibly Yuma myotis. Although these species do roost in human-made structures, the observed bats did not seem to originate from the study area and likely emerged from roosts in buildings or natural roost features (e.g., rocks or mature trees) on adjacent parcels.

None of the bats observed during the survey are special-status species. Database records from the 1950s revealed the occurrence of two special-status bat species (i.e., California leaf-nosed bat [Macrotus californicus] and western mastiff bat [Eumops perotis californicus]) in reasonably close proximity to the study area; however, no suitable roosting habitat for California leaf-nosed bats is present within the study area. In addition, the California leaf-nosed bat is now considered extirpated from that portion of its range. The western mastiff bat was also not detected during the nighttime survey and is not expected to roost in the study area; however, it is possible that this species may occasionally forage above the study area. Although no special-status bat species were observed in the study area or immediately adjacent areas during the focused survey for bats, there is moderate potential for western yellow bat, a CDFW species of special concern that roosts in palm trees, to occur in the study area.

Although the mature oak trees and ornamental trees such as palms present within the survey area are suitable for roosting by foliage-roosting species such as hoary bats and western yellow

bats, no bats were observed emerging from the trees, and no tree-roosting bat species were acoustically detected during the nighttime emergence survey. Based on these survey results, there is no evidence that bats are currently utilizing any of the trees within the study area for day roosting; however, it should be noted that since bats are highly mobile species, it is possible that although they are currently absent from the study area, foliage-roosting bats may roost within suitable trees at any time. Therefore, to avoid potential direct mortality to flightless young bats, LSA recommends that tree trimming/removal activities associated with the Project be conducted outside the recognized bat maternity season, which occurs from April 1 through August 31 in southern California. This period also coincides with the bird nesting season of February 15 through September 1. If trees must be trimmed or removed during the bat maternity season referred to above, LSA recommends conducting a bat survey of those trees within 2 to 3 days prior to the trimming or removal. If any bat roosting is detected, no tree removal or trimming activities will occur within 100 feet of the roosting location until the bats have completed their roosting activities. These requirements are included as **Mitigation Measure MM-Bio-2**.

Bat guano consistent in size and deposition pattern with one of the Myotis species was observed in one of the storage sheds near the middle of the property. Although the structural features above the observed guano are suitable for day and/or night roosting, since no bats were present within that structure during the daytime assessment, it is more likely used for night roosting and not as a day roost or maternity roost. Based on the results of the daytime assessment and nighttime survey, in which no bats appeared to emerge from any of the structures and large concentrations of bats were not observed, there is no evidence that bats are currently utilizing any of the structures within the study area for day roosting or for maternity roosting. It should be noted, however, that the attic spaces of the two vacant white houses and the houses occupied by tenants at the time of the survey have not been inspected to determine the presence or absence of roosting bats, so this possibility cannot be entirely ruled out. Potential entry points were observed in the gable vents of the two vacant white houses. In addition, since bats are highly mobile species, it is possible that bats may roost within any suitable roost feature at any time.

Therefore, to avoid potential direct mortality to roosting bats, LSA recommends that the attic spaces of the various houses be examined for the presence of bats within 2 to 3 days prior to demolition of those structures. These attic spaces are the only sites identified within structures throughout the study area that could potentially support maternity roosting by large numbers of bats. If maternity-roosting bats are found, LSA recommends that a humane eviction and exclusion be performed outside of the recognized bat maternity season (April 1–August 31 in southern California) to prevent potential direct impacts to roosting bats, including flightless young, and that alternate roosting structures (e.g., “bat houses”) be installed to mitigate for the loss of habitat. However, unless bats are found roosting within the attic spaces of the various residences, no extensive loss of bat day-roosting habitat is anticipated from the removal of structures within the study area. This is included as **Mitigation Measure MM-Bio-3.** However, unless bats are found roosting within the attic spaces of the various residences, no extensive loss of bat day-roosting habitat is anticipated from the removal of structures within the study area.

Special-Status Species

Based on the results of a multi-database records search, only two special-status plant species (i.e., San Fernando Valley spineflower [Chorizanthe parryi var. fernandina] and Santa Susana tarplant [Deinandra minthornii]) were identified as previously occurring in reasonably close proximity to the study area. San Fernando Valley spineflower is an annual herbaceous plant that is State listed as Endangered, and also has a CNPS California Rare Plant Rank (CRPR) of 1B.1. This plant species is typically associated with dry, sandy soils in coastal sage scrub (CSS) habitat and usually blooms from April through July. Santa Susana tarplant is a deciduous shrub that is typically associated with rocky chaparral or CSS habitat. This plant species is State listed as Rare, and also has a CRPR of 1B.2. However, no special-status plants were observed during the site survey, and the study area, being highly disturbed and comprised mostly of nonnative vegetation, is not expected to support any special-status plant species. Therefore, the Project would not adversely impact any special-status plant species.

Although no special-status animal species were observed in the study area or immediately adjacent areas during the site survey, there is potential for some special-status animals to occur in the study area. For instance, database records from the 1950s revealed the occurrence of two special-status bat species (i.e., California leaf-nosed bat [Macrotus californicus] and western mastiff bat [Eumops perotis californicus]) in reasonably close proximity to the study area. Both species are designated Species of Special Concern by CDFW. In addition, the trees and buildings in the study area, as well as the periodic water available in the flood control channel, are suitable for supporting roosting and foraging bats, and the presence of large boulders on the rocky hillsides in the surrounding areas likely support bat species. Therefore, removal of trees and buildings as part of the Project could potentially result in an adverse impact to bats if present.

Also, the open fields or pastures in the study area could potentially support burrowing owl (Athene cunicularia), a California Species of Special Concern, although none were observed during the site survey. These open fields or pastures consist largely of ruderal nonnative grassland habitat with many active ground squirrel burrows. Other special-status raptor species, such as Cooper's hawk (Accipiter cooperii) (California Species of Special Concern), could potentially nest in the tall trees in the study area. Although Swainson's hawk (Buteo swainsoni), State listed as Threatened, was identified in 1898 as occurring in the vicinity of the study area, this species currently has not been known to nest south of the Antelope Valley and is no longer expected to occur in the study area.

Burrowing owl is a special-status species that could potentially occur in the study area. Therefore, to avoid any potential adverse impacts to burrowing owls that may unexpectedly show up on site, a pre-construction survey of the study area is recommended within 3 days of the start of construction activities. If no burrowing owls are found, construction can proceed immediately. If this species is present, LSA recommends having a qualified biologist present during construction activities to monitor the work and flush any birds out of the project area to ensure they are adequately protected. See **Mitigation Measure MM-Bio-4**.

Project Design Feature

PDF-Bio-1 Invasive, exotic plant species shall be prohibited as part of the landscape plan for the Project. The invasive plants to be prohibited from use in landscaping shall include any of the plant species rated as "High" or "Moderate" in the California Invasive Plant Inventory Database, which is maintained by the California Invasive Plant Council (Cal-IPC).

This prohibition will be included in the CC&Rs for future residents.

Mitigation Measures

MM-Bio-1 Nesting Birds

When feasible, any proposed clearing and grubbing of vegetation within the project limits and the generation of nuisance noise during construction activities should occur after September 15 and prior to March 15, which would be outside the typical breeding season (i.e., March 15–September 15) for most birds.

If avoidance of this breeding season is not feasible, a nesting bird survey shall be conducted by a qualified biologist within 3 days prior to any vegetation-clearing activities to ensure that birds are not engaged in active nesting within 100 ft of the work area.

If nesting birds are discovered during this survey, the biologist shall identify an appropriate setback, or buffer (i.e., up to 500 ft depending on the circumstances and specific bird species) where no construction activities or other disturbances are allowed to occur until after the birds have fledged or otherwise abandoned the nest.

The adverse effects of lighting on wildlife can be avoided provided the construction activities associated with the project occur during daylight hours. However, if construction must occur during nighttime hours, the amount of lighting used should be minimized and localized as much as is feasible. This temporary impact is unlikely to result in a significant impact to nocturnal wildlife in the area. If additional lighting is to be installed in the work area, this lighting shall be directed downward and shall not be directed outward toward any adjacent open space areas.

MM-Bio-2 Flightless Bats

To avoid potential direct mortality to flightless young bats, tree trimming/removal activities associated with the Project shall be conducted outside the recognized bat maternity season, which occurs from April 1 through August 31 in southern California. This period also coincides with the bird nesting season of February 15 through September 1.

If trees must be trimmed or removed during the bat maternity season referred to above, a preconstruction bat survey of those trees shall be conducted within 2 to 3 days prior to the trimming or removal.

If any bat roosting is detected, no tree removal or trimming activities shall occur within 100 feet of the roosting location until the bats have completed their roosting activities.

MM-Bio-3 Roosting Bats

To avoid potential direct mortality to roosting bats, the attic spaces of the houses and structures shall be examined for the presence of bats within 3 days prior to demolition of those structures. These attic spaces are the only sites identified within structures throughout the study area that could potentially support maternity roosting by large numbers of bats.

If maternity-roosting bats are found, a humane eviction and exclusion shall be performed outside of the recognized bat maternity season (April 1–August 31 in southern California) to prevent potential direct impacts to roosting bats, including flightless young, and that alternate roosting structures (e.g., "bat houses") be installed to mitigate for the loss of habitat.

MM-Bio-4 Burrowing Owls

To avoid any potential adverse impacts to burrowing owls that may unexpectedly show up on site, a preconstruction survey of the study area for burrowing owl shall be conducted within 3 days of the start of construction activities. If no burrowing owls are found, construction can proceed immediately. If this species is detected during pre-construction surveys, a qualified biologist shall be present during construction activities to monitor the work and flush any birds out of the project area to ensure they are adequately protected.

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

No Impact.

A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS were to be adversely modified without adequate mitigation. No riparian or other sensitive habitat areas

are located on or adjacent to the Project Site.[22] Therefore, no impact to riparian habitat or sensitive natural community would occur.

c) Would the project 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?

Less Than Significant Impact.

A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project without adequate mitigation.

The Santa Susana Channel is classified as a Riverine Wetland and cuts across the Site.[23] However, the Project would not be affecting the channel. There is an existing bridge across the channel that will be maintained and used for Lots 18 and 19 to access the rear portions of their lots. The United States Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB) would be expected to assert regulatory jurisdiction over the channel pursuant to Sections 404 and 401 of the Clean Water Act, respectively. In addition, the CDFW would likely assert jurisdiction over this channel under Section 1602 of the California Fish and Game Code.

The Project will not impact the concrete box flood control channel that extends across and adjacent to a portion of the study area. Provided there is no discharge of any fill material, including soil or vegetation, into this potential jurisdictional waterbody, a Section 404 authorization from the USACE and a Section 401 Water Quality Certification from the RWQCB will not be required. Also, provided there is no substantial alteration of the physical features of the flood control channel, it will not be necessary to submit a CDFW Notification of Lake or Streambed Alteration pursuant to Section 1602 of the California Fish and Game Code. Nevertheless, as a precautionary measure to avoid any incidental construction-related impacts to the potential jurisdictional channel, LSA recommends having a solid, temporary barrier (e.g., a silt fence or equivalent) installed and maintained just outside the top of the channel bank prior to the start of construction activities. See **Project Design Feature PDF-Bio-2**. This would aid in capturing any debris and materials that might otherwise end up in the channel and thus avoid any impacts to this potential jurisdictional channel. A less than significant impact to federally protected wetlands would occur.

Project Design Feature

PDF-Bio-2 To avoid any incidental construction-related impacts to the potential jurisdictional channel, a solid, temporary barrier (e.g., a silt fence or equivalent) shall be

[22] U. S. Fish & Wildlife Service, National Wetlands Inventory, Riparian Layer: http://www.fws.gov/wetlands/Data/Mapper.html, August 22, 2017.

[23] U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: http://www.fws.gov/wetlands/Data/Mapper.html, accessed August 22, 2017.

installed and maintained just outside the top of the channel bank prior to the start of construction activities.

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

No Impact.

A significant impact would occur if a project would interfere with or remove access to a migratory wildlife corridor or impede the use of wildlife nursery sites. Although there may be some temporary impacts to wildlife movement across the study area during construction activities, the Project is not expected to result in disrupting, impeding, or otherwise adversely impacting wildlife movement on a long-term basis. Therefore, no impacts would occur.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact with Mitigation.

A project-related significant adverse effect could occur if a project would cause an impact that is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance, which protects certain trees (including Valley Oak and California Live Oak, Southern California Black Walnut, Western Sycamore, and California Bay).[24]

The Site is composed primarily of disturbed, ruderal vegetation with some native trees.[25] There are 19 coast live oak (Quercus agrifolia) trees on the Site. 15 of these trees will be protected throughout construction and will be retained. 4 of these trees are recommended for removal due to grading constraints, drainage and other required utility services, as well as potential constraints due to the proposed equestrian requirements.

Two coast live oaks (#1 and #2), not included in the 19 protected trees currently located on the property, failed (fallen over due to decay and structural defects) since the analysis was first prepared. These trees were not salvageable and are no longer on site.

There are also 129 Non-Protected Significant Trees on the Site. These trees include 46 California pepper trees (Schinus molle), 27 olive trees (Olea europa), 10 Mexican elderberry (Sambucus mexicana), 6 blue gum eucalyptus (Eucalyptus globulus), 5 citrus, 4 Canary Island palms (Phoenix canariensis), 3 she oaks (Casuarina sp.), and 3 Evergreen Ash (Fraxinus uhdei) among 25 other species. See **Table 3.4-1** for a list of all the trees on the Site.

109 of the Non-Protected Significant Trees are recommended for removal to the satisfaction of the City of Los Angeles. The other 20 Non-Protected Significant Trees will remain protected in

[24] City of Los Angeles, Ordinance No. 177404: http://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf.

[25] Evaluation of Biological Resources, LSA, July 28, 2016. Included as an appendix to this MND.

place.[26] The tree replacement plan (part of the Tree Report) shows that the 109 non-protected trees will be replaced on a 1:1 ratio, the 2 dead trees replaced on a 0:1 ratio (i.e. 0), and the 4 protected trees will be replaced on a 4:1 ratio. See **Table 3.4-2**. The trees will be removed and replaced according to **Mitigation Measure MM-Bio-5** below. Impacts will be less than significant after mitigation.

Table 3.4-1
Summary of Trees on the Site

Protected Trees	Dead Trees	Non-Protected
19 coast live oak	2 coast live oak	46 California Pepper 27 Olive 10 Mexican Elderberry 6 Blue Gum 5 Citrus 4 Canary Island Palm 3 She Oak 3 Evergreen Ash 3 Monterey Pine 2 Mexican Fan Palm 2 Northern California Walnut 2 Pomegranate 2 Brazilian Pepper 2 Aleppo Pine 1 English Walnut 1 Ginkgo, 1 Rubber Fig 1 Deodar Cedar 1 Carrotwood 1 Chinese Elm 1 Red Cedar 1 Canary Pine 1 Melaleuca 1 Xylosma 1 Eugenia 1 Non-native species
Protected Tree Report, The Tree Resource, November 6, 2018		

Table 3.4-2
Summary of Tree Replacement

	Existing to be removed	Trees Replaced
Protected Trees (replaced 4:1)	4	16
Dead Trees (replaced 0:1)	2	0
Non-Protected Trees (replaced 1:1)	109	109
Total	**113**	**125**
Protected Tree Report, The Tree Resource, November 6, 2018.		

Mitigation Measure

[26] Protected Tree Report, The Tree Resource, November 6, 2018. Included as an appendix to this MND.

MM-Bio-5 Non-Protected Significant Trees shall be replaced on a one-to-one (1:1) ratio to the satisfaction of the City of Los Angeles.

Protected Significant Trees shall be replaced on a four-to-one 4:1 ratio to the satisfaction of the Urban Forestry Division.

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

No Impact.

A significant impact would occur if a project is inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site is located in an urbanized area of the City. Due to the existing urban development on the Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site.

There are no City or county significant ecological areas in the vicinity of the Project Site.[27] The nearest is the Chatsworth Nature Preserve and Reservoir, approximately 2 miles south of the Site. The Project Site is not located within the boundary of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans would occur.

[27] Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/navigatela/.

5. CULTURAL RESOURCES

The section is based, in part, on the following items, included as Appendix D of this IS/MND:

D-1 Phase I Cultural Resources Inventory, PSOMAS, May 2018.[28]

D-2 Historic Resource Assessment, Daly & Associates, December 2018.

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines §15064.5?

Less Than Significant Impact with Mitigation.

State CEQA Guidelines Section 15064.5 defines a 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 a 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 a project were to adversely affect a historical resource meeting one of the above definitions.

Four legal parcels, with the APNs of 2723-005-002, 2723-005-003, 2723-005-017, and 2723-005-030 were evaluated for historical significance.

The Project intends to retain the Wilson House (on Lot 5), and preserve and rehabilitate the structure to ensure its continued status as a historic resource. The Project also intend to construct within the Wilson House lot, a separate, unattached garage to the immediate west of the house. In the future, the Project proponents may desire to alter the Wilson House, with the construction of an addition to the rear elevation of the building. The Wilson House has been determined through this survey and evaluation as potentially eligible for listing in the California Register as a building that is associated with the early history of Chatsworth and the San Fernando Valley, and as a rare remaining example of a citrus ranch house dating from the early 1900s. Character-defining features of the Wilson House include:

- Parapet wall
- False roof eaves
- Eave brackets
- Original fenestration and window trim

[28] The Cultural Resources Survey of May 2018 was used in this MND for its information on archaeological and paleontological resources. The historic assessment was based on the Historic Resource Assessment of December 2018.

- Original doors and trim
- Stucco finish
- Front and rear elevation concrete steps, step kneewalls
- Pergola on front elevation

Substantial adverse change to a historic building means the physical demolition, destruction, relocation, or alteration of the resource, or its immediate surroundings, such that the ability of the resource to convey its significance would be materially impaired. The significance of a historic resource is materially impaired when a project alters in an adverse manner those physical characteristics of a resource that that justify its eligibility for inclusion in the National Register, California Register, or as a Monument.

Examples of direct physical changes in the environment within the Project site include heavy equipment traffic, construction dust, noise, vibrations, and tree removal activity. Once a building, structure, object, feature, or landscape has been determined eligible for listing in the National Register or California Register, a project that proposes repairs, alterations and/or additions necessary for the preservation, restoration, rehabilitation, moving or continued use of an historical building or structure" falls under the regulations of the California 2016 Historical Building Code (CHBC), California Code of Regulations Title 24, Part 8 (January 1, 2017). The regulations of the CHBC have the same authority as state law and are to be considered as such. The intent of the CHBC is to facilitate the preservation and continuing use of qualified historical buildings while providing reasonable safety for the building occupants and access for persons with disabilities.

The line of olive trees along the south boundary line of Parcel 2 (APN 2723-005-003) appear to severely cut back over the years, so much so, that they have not been shaped into trees such as the historic olive trees along Lassen Street in Chatsworth. The removal of the trees will not be considered a substantial adverse change to the environment.

For Parcels 3 and 4 (APNs 2723-005-017 and 2723-005-030), it was determined through survey and evaluation that the built-environment resources on those parcels do not meet the criteria of the National Register, California Register, or Monument to be considered significant historic resources. As they have been determined to not be significant resources, the removal of those resources will not be considered a substantial adverse change to the environment.

The Wilson House at 10921 Old Santa Susana Pass Road situated on Parcel 1 (APN 2723-005-002) has been determined a historic resource per the SurveyLA project completed for the Porter Ranch-Chatsworth Community Plan Area in 2015, and as a result of the current intensive-level survey and evaluation. The historic report has confirmed the SurveyLA findings that the property is a significant historical resource eligible for listing in the California Register as well as the National Register, and as a Monument.

The Project is to construct 18 new homes (and other community improvements) on lots to the west and south of the Wilson House. The Project also include the construction of an unattached automobile garage on the Wilson House lot, and future plans may include the construction of an addition to the rear (west) elevation of the Wilson House for the purpose of enlarging the kitchen area. Substantial adverse changes to a historic property include demolition, destruction, relocation, or alteration such that the significance of a historical resource would be materially altered. By instituting the mitigation measures listed below to address the possible loss of physical integrity that may occur to the Wilson House as a result of the Project, the Project impacts will be reduced to a level of less-than-significant.[29]

Mitigation Measures

MM-Cultural-1 The Wilson House shall be protected by cyclone-fencing, K-rails, plywood window coverings, or other means, to create a buffer from the accidental intrusion of construction equipment onto, or near, the Wilson House property. The exterior character-defining features of the Wilson House shall also be protected during tree trimming and removal activities, and future construction activities on the lot. Any damage that may occur to the Wilson House from construction or maintenance activities, shall be repaired in accordance with The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, & Reconstructing Historic Buildings (Kay D. Weeks and Anne E. Grimmer, revised 2017) under the supervision of a qualified Historic Architect or Architectural Historian (with experience in preparing repair and rehabilitation plans.)

MM-Cultural-2 The Wilson House shall not be substantially altered or demolished, and that the resource shall retain its eligibility for listing in the in the National Register, California Register, and as a Monument. The recommended mitigation measures may avoid adverse impacts by not materially altering those physical characteristics and aspects of integrity that convey the buildings historic significance and architecture. If the recommended mitigation measure is adopted, the Project shall not have a significant effect on the historical property. The Wilson House shall be rehabilitated to serve its original use as a single family residence.

Project proponents intend to use the Wilson House as a single-family residence and under CEQA they are required to follow The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, & Reconstructing Historic Buildings (Kay D. Weeks and Anne E. Grimmer, revised 2017.) Project proponents shall retain the services of a qualified Historic

[29] Historic Resource Assessment, Daly & Associates, December 2018.

Architect or Architectural Historian (with experience in preparing rehabilitation plans) to assist in the future use and function of the building.

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

Less Than Significant Impact with Mitigation.

Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories. The Project would require grading, which could create a possibility of encountering a significant archaeological resource.

A records search and literature review of documents on file at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton was conducted on August 3, 2016. The SCCIC is a designated branch of the California Historical Resources Information System and houses records of archaeological and historic resources in Orange, Los Angeles, Ventura, and San Bernardino Counties. The review consisted of an examination of the U.S. Geological Survey's (USGS') Oat Mountain 7.5-minute quadrangle to determine if any sites are recorded on or if any cultural resources studies have been conducted on or within a ½-mile radius of the subject property. Data sources consulted at the SCCIC included archaeological records, Archaeological Determinations of Eligibility (DOE), historic maps, and the Historic Property Data File (HPDF) maintained by the Office of Historic Preservation (OHP). The HPDF contains listings for the CRHR and/or the NRHP, California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI).

The SCCIC literature review revealed that 21 cultural resource studies have been conducted within a ½ mile of the Project site and also identified 13 cultural resources within a ½-mile radius of the Site. None included any portion of the Site or were located on the Site.[30]The technical cultural resources studies consist of block and linear surveys and construction compliance monitoring projects dating to as early as 1971 and as recently as 2015. The studies were located to the south, southeast, southwest, north, northeast, and northwest of the project area; and are all within ½-mile of the project site. The academic overview studies are a testament to the archaeological sensitivity of region, including the project area.

Although the Project would have a low probability of disturbing previously unrecorded archaeological resources, a potential exists that unknown archaeological resources will be discovered during construction activities. Implementation of **Mitigation Measure MM-Cultural-3**, requiring a qualified Archaeologist to evaluate unanticipated discoveries, would reduce potential impacts to less than significant.

Mitigation Measure

[30] Phase I Cultural Resources Inventory, PSOMAS, May 2018.

MM-Cultural-3 Prior to grading, a professional Archaeologist shall be retained to observe excavations on the property for the presence of archaeological materials. Prior to grading, the areas to be monitored will be determined from consultation with the grading contractor during the pre-grade meeting.

All artifacts discovered at the development site shall be inventoried and analyzed by the Project Archaeologist. If any artifacts of Native American origin are discovered, the Property Owner/Developer and Project Archaeologist shall notify the City of Los Angeles Planning Department and the appropriate local Native American tribe identified by the Native American Heritage Commission. The significance of Native American resources shall be evaluated in accordance with the provisions of the California Environmental Quality Act (CEQA) and shall consider the religious beliefs, customs, and practices of the tribe. All items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling. Native American artifacts that cannot be avoided or relocated at the Project site shall be prepared in a manner for curation, and the Project Archaeologist shall deliver the materials to an accredited curation facility approved by the City of Los Angeles within a reasonable amount of time.

Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. Subsequent to analysis and reporting, these artifacts shall be subjected to curation or returned to the Property Owner/Developer, as deemed appropriate.

Once ground-altering activities have ceased or the Project Archaeologist determines that monitoring activities are no longer necessary, monitoring activities may be discontinued following notification to the City of Los Angeles Planning Department.

A report of findings, including an itemized inventory of recovered artifacts, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered artifacts. The report and inventory, when submitted to the City of Los Angeles Planning Department, shall signify completion of the program to mitigate impacts to archaeological and/or cultural resources. A copy of the report shall also be filed with the South Central Coastal Information Center (SCCIC).

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation.

A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project would require grading, which could result in the potential for buried paleontological resources to be found within the Project Site.

The Natural History Museum of Los Angeles County (NHMLAC) was contacted and requested to review its topographical maps for the Project area to determine the geology underlying the Project Site; the sensitivity of the site for the presence of fossils; and if any fossil-bearing localities had been recorded. A request was sent to the vertebrate paleontology section of the NHMLAC to conduct a records search for the Project area. They responded in writing on September 12, 2016. According to their response, there are no known fossil localities on the Site; however, numerous localities have been recorded in the area.[31]

There is a potential that deeper ground-disturbing activities associated with construction would encounter previously unknown unique paleontological resources. This could result in a significant impact to paleontological resources. Implementation of **Mitigation Measure MM-Cultural-4,** requiring a qualified Paleontologist to evaluate unanticipated discoveries, would reduce potential impacts to less than significant.

Mitigation Measure

MM-Cultural-4 If any paleontological resources (e.g., plant or animal fossils) are encountered before or during grading, the Property Owner/Developer shall retain a qualified Paleontologist to evaluate unanticipated discoveries and to take appropriate measures to protect or preserve them for study. The Paleontologist shall submit a report of findings that will also provide specific recommendations regarding further measures (i.e., paleontological monitoring) that may be appropriate. Where monitoring is appropriate, the program must include, but not be limited to, the following measures:

Assign a Paleontological Monitor, trained and equipped to allow the rapid removal of fossils with minimal construction delay, to the site full time during earth-disturbing activities.

Divert earth-disturbing activities away from the immediate area of the discovery until the Paleontological Monitor has completed salvage. If construction personnel make the discovery, the grading contractor shall immediately divert construction and notify the Paleontological Monitor of the find.

Prepare, identify, and curate all recovered fossils for documentation in the summary report and transfer to an appropriate repository.

[31] Phase I Cultural Resources Inventory, PSOMAS, May 2018.

Prepare and submit a technical report describing the identification, salvage, evaluation, and treatment of all fossils discovered during grading to the City of Los Angeles. Transfer collected specimens with a copy of the report to the depository.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact.

A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Project Site would require grading, which could result in discovery of unrecorded human remains.

Section 7050.5 of the California Health and Safety Code provides for the disposition of accidentally discovered human remains. Section 7050.5 states that, if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

Section 5097.98 of the PRC states that, if remains are determined by the Coroner to be of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours which, in turn, must identify the person or persons it believes to be the most likely descended from the deceased Native American. The descendant(s) shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative(s) would then determine, in consultation with the property owner, the disposition of the human remains. Therefore, potential Project impacts on human remains would be less than significant.

6. GEOLOGY AND SOILS

This section is based on the following reports and letters, included as Appendix E of this IS/MND:

E-1 Preliminary Geotechnical Investigation, Albus-Keefe and Associates, August 17, 2016.

E-2 Infiltration Study for Proposed Water Quality Improvements, Albus-Keefe and Associates, September 12, 2016.

E-3 Response to City of Los Angeles, Albus-Keefe and Associates, February 16, 2017.

In 2015, the California Supreme Court in CBIA v. BAAQMD (2015) 62 Cal.4th 369, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. However, the decision also held that when a proposed project could potentially exacerbate environmental hazards or conditions that already exist, an analysis of the potential impact of such hazardous conditions on future residents or users is required. In those limited instances, the project's impact on the environment not the environment's impact on the project, must be evaluated to determine how the project's future residents or users could be affected by exacerbated conditions. The revised thresholds are intended to comply with this decision.

a) Exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact.

The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. California faults are classified as active, potentially active or inactive. Faults from past geologic periods of mountain building, but do not display any evidence of recent offset are considered "inactive" or "potentially active." Faults that have historically produced earthquakes or show evidence of movement within the Holocene (past 11,000 years) are considered "active faults." Active faults that are capable of causing large earthquakes may also cause ground rupture. The Alquist-Priolo Act of 1971 was enacted to protect structures from hazards associated with fault ground rupture.

No active faults are known to project through the site nor does the site lie within the bounds of an "Earthquake Fault Zone" as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act. As such, the potential for ground rupture due to a fault

displacement beneath the site is considered very low.[32] Therefore, Project impacts would be less than significant and the Project would not cause or exacerbate seismic conditions on the Project Site.

(ii) Strong seismic ground shaking?

Less Than Significant Impact.

The principal seismic hazard to the Project Site and Project is strong ground shaking from earthquakes produced by local faults. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, moment-resisting frames and reinforcement. Additional precautions may be taken to protect personal property and reduce the chance of injury, including strapping water heaters and securing furniture and appliances. It is likely that the Project Site will be shaken by future earthquakes produced in southern California.

The California State Legislature enacted the Seismic Hazards Mapping Act of 1990, which was prompted by damaging earthquakes in California, and was intended to protect public safety from the effects of strong ground shaking, liquefaction, landslides, and other earthquake-related hazards. The Seismic Hazards Mapping Act requires that the State Geologist delineate various "seismic hazards zones." The maps depicting the zones are released by the California Geological Survey. The Seismic Hazards Mapping Act requires a site investigation by a certified engineering geologist and/or civil engineer with expertise in geotechnical engineering, for projects sited within a hazard zone. The investigation is to include recommendations for a "minimum level of mitigation" that should reduce the risk of ground failure during an earthquake to a level that does not cause the collapse of buildings for human occupancy. The Seismic Hazards Mapping Act does not require mitigation to a level of no ground failure and/or no structural damage.

As with most locations in southern California, there is a considerable potential for strong seismic shaking at the Project Site. The Project structures would be designed in accordance with seismic parameters contained in the City of Los Angeles and California Building Code. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the LAMC, which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk or loss or injury. The Project would comply with Site-specific seismic design parameters provided in the Preliminary Geotechnical Investigation (Albus-Keef, August 17, 2016). Therefore, Project impacts related to seismic ground shaking would be less than significant.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact.

[32] Preliminary Geotechnical Investigation, Albus-Keefe and Associates, August 17, 2016.

Liquefaction is a phenomenon in which saturated silty to cohesion-less soils below the groundwater table are subject to temporary loss of strength due to buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

According to the City of Los Angeles ZIMAS mapping system the Project Site is classified within an area susceptible to liquefaction.[33] According to the General Plan Safety Element, the Project Site is within a liquefaction area.[34]

Albus-Keefe performed engineering analyses to evaluate the potential for liquefaction at the site if the design earthquake event were to occur. Based on the analyses, total seismic settlement (saturated and dry) could be up to approximately 2.6 inches with a differential settlement of approximately 1.3 inches over 30 feet assuming ground water rose to a depth of 25 feet during the maximum seismic event. Past performance of one- to three-story wood-frame structures has shown that such movement may cause cosmetic damage but does not typically result in compromising the overall structural integrity of the building. Based on the State of California Special Publication 117A, hazards from liquefaction should be mitigated to the extent required to reduce seismic risk to "acceptable levels". The acceptable level of risk means, "that level that provides reasonable protection of the public safety" [California Code of Regulations Title 14, Section 3721 (a)]. The cited memo by the City of Los Angeles dated July 16, 2014 requires: "Deformations of any foundations shall be such that the foundations of the buildings or other structures do not lose their ability to carry gravity loads and that collapse of the building or other structures is prevented." The use of well-reinforced foundations such as post-tensioned slabs or mats have been proven to adequately provide basal support for similar structures during comparable liquefaction events. Specific recommendations for design of foundations to reduce adverse effects of liquefaction or provided in the Preliminary Geotechnical Investigation (Albus-Keef, August 17, 2016) and Infiltration Study (Albus-Keefe, September 12, 2016).

The Project Site is bisected by an existing rectangular concrete-lined channel referred to as Santa Susana Creek. The proposed improvements will convey storm water into private streets and a storm drain line that will discharge into the Santa Susana Creek channel. Existing drainage patterns will be maintained with this system. Approximately 4% of the site is impervious in its existing condition and the proposed development will be approximately 25% impervious. While proposed site improvements will result in an increase in impervious areas, the post-development peak flow rates will not increase from pre-development peak flow rates. This is a result of the project improvements removing the debris factor which will in turn reduce the burned and bulked flow rate, as well as, the implementation of Low Impact Development (LID) Best Management Practices (BMPs). A Low Impact Development (LID)/Standard Urban Storm Water Mitigation Plan (SUSMP) will be prepared to demonstrate compliance with the Los Angeles City LID Requirements. Infiltration of storm water has been determined to be infeasible due to the risk of liquefaction hazards. Therefore, anticipated Best Management Practices (BMP's)

[33] ZIMAS search: http://zimas.lacity.org/.

[34] Los Angeles Safety Element, Exhibit B, Areas Susceptible to Liquefaction in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, August 24, 2017.

include stormwater capture and use and high efficiency biofiltration/biotreatment. The high efficiency biofiltration/biotreatment BMPs will be sized to adequately capture 1.5 times the volume not managed through capture and use BMPs.[35] Therefore, Project impacts associated with liquefaction would be less than significant.

(iv) Landslides?

No Impact.

A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. A landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow.

Geologic hazards associated with landsliding are not anticipated at the site. Furthermore, the site is not located within an area identified by the California Geologic Survey (CGS) as having potential for seismic slope instability.[36]

The City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.[37] The General Plan Safety Element does not identify the Project Site as a bedrock or probable bedrock landslide area.[38] Therefore, the potential for slope stability hazards to adversely affect the proposed development is considered low. Therefore, no Project impacts with respect to landslides would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact.

A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. Demolition (removal of the existing buildings) and grading would expose minimal amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading process, substantial erosion will not occur.

Grading would be required for foundation footings and soil compaction. All grading activities would require permits from the City of Los Angeles Department of Building and Safety, which reviews compliance with requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Division 70, addressing grading, excavation, and fills. The Project's grading plan would conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of

[35] Stantec, August 2017.

[36] Preliminary Geotechnical Investigation, Albus-Keefe and Associates, August 17, 2016.

[37] ZIMAS search: http://zimas.lacity.org/.

[38] Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, August 24, 2017.

Building and Safety's Grading Division. Appropriate erosion control and drainage devices per the Los Angeles Municipal Code Section 91.7013 would be provided to the satisfaction of the Los Angeles Department of Building and Safety.

During construction, the Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). With the implementation of the required construction BMPs, soil erosion during construction impacts would be less than significant. Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. Therefore, operation impacts related to erosion or the loss of topsoil would be less than significant.

c) Would the project 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 caused in whole or in part by the Project's exacerbation of the existing environmental conditions?

Less Than Significant Impact.

A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. As discussed in the response to Questions 6(a)(iii) and 6(a)(iv), the Project Site is not at risk for liquefaction or landslides.

From a geotechnical point of view, the proposed site development is considered feasible provided the development is designed and constructed in accordance with the recommendations presented in the Preliminary Geotechnical Investigation (Albus-Keef, August 17, 2016).[39] This would ensure that the Project is developed and constructed as feasible from a geotechnical perspective. Therefore, impacts would be less than significant.

d) Would the project 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 caused in whole or in part by the project exacerbating the expansive soil conditions?

Less Than Significant Impact.

A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. Expansive soils contain significant amounts of clay, which may expand or shrink with moisture variations.

[39] Preliminary Geotechnical Investigation, Albus-Keefe and Associates, August 17, 2016.

Based on Albus-Keefe's laboratory test results and Unified Soil Classification System's visual manual classification, the near-surface soils within the site are generally anticipated to possess a Very Low expansion potential. Additional testing for soil expansion will be required subsequent to rough grading and prior to construction of foundations and other concrete work to confirm these conditions.[40] Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, LAMC, and other applicable building codes which includes building foundation requirements appropriate to Site-specific conditions. Therefore, impacts associated with expansive soils would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Less Than Significant Impact.

In some parts of the City, public sewers are not available nearby for connection or homes were built before public sewers were available. In these cases, sewage is treated by On-site Wastewater Treatment Systems (OWTS), also called septic systems. Since septic systems are on private property, property owners have complete responsibility for taking care of them.

All lots except Lot 19 would be served by a wastewater collection, conveyance, and treatment system operated by the City. Lot 19 would have an onsite wastewater treatment system (also called septic or private sewer system). It would have properly installed and operating backwater valves. The OWTS can be either a septic system with cesspool or septic system with drain field.

The State Water Resources Control Board has responsibility for regulating OWTS and protecting groundwater resources. However, LA Sanitation's OWTS group works to ensure protection of the City's surface water and groundwater resources. This is done to ensure that OWTS are meeting water quality and construction standards for maintaining the City's environmental and public health needs. LA Sanitation's OWTS group facilitates permitting process for homeowners and operators that need permits for new construction of OWTS. LA Sanitation works with the Bureau of Engineering, Watershed Protection Division, Department of Building and Safety, and the Regional Water Quality Control Board.[41] The OWTS will be installed and maintained according to the requirements and regulations in LADBS Information Bulletin/Public – Building Code Number P/BC 2017-027.[42] Therefore, a less than significant impact related to alternative wastewater disposal systems would occur.

[40] Preliminary Geotechnical Investigation, Albus-Keefe and Associates, August 17, 2016.

[41] https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-ssps?_adf.ctrl-state=nvisvzg88_4&_afrLoop=13151823664984153#!

[42] https://www.ladbs.org/docs/default-source/publications/information-bulletins/building-code/onsite-wastewater-treatment-system-(owts)-(residential)-ib-p-bc2017-027.pdf?sfvrsn=21

7. GREENHOUSE GAS EMISSIONS

The section is based, in part, on the following item included as Appendix B of this IS/MND:

B Air Quality and Greenhouse Gases Analysis, LSA, August 2017.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact.

Description of Global Climate Change and Its Sources

Global climate change (GCC) is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other significant changes in climate (such as precipitation or wind) that last for an extended period of time. The term "global climate change" is often used interchangeably with the term "global warming," but "global climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. Climate change refers to any change in measures of weather (such as temperature, precipitation, or wind) lasting for an extended period (decades or longer). Climate change may result from natural factors, such as changes in the sun's intensity; natural processes within the climate system (e.g., changes in ocean circulation); or human activities, such as the burning of fossil fuels, land clearing, or agriculture. The primary observed effect of GCC has been a rise in the average global tropospheric[43] temperature of 0.36°F per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling shows that further warming may occur, which may induce additional changes in the global climate system during the current century. Changes to the global climate system, ecosystems, and the environment of the State could include higher sea levels, drier or wetter weather, changes in ocean salinity, changes in wind patterns, or more energetic aspects of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and increased intensity of tropical cyclones. Specific effects in the State might include a decline in the Sierra Nevada snowpack, erosion of the State's coastline, and seawater intrusion in the San Joaquin Delta.

Global surface temperatures have risen by 1.33°F ±0.32°F over the last 100 years (1906 to 2005). The rate of warming over the last 50 years is almost double that over the last 100 years (Intergovernmental Panel on Climate Change [IPCC] 2013). The latest projections, based on state-of-the art climate models, indicate that temperatures in the State are expected to rise 3–10.5°F by the end of the century (State of California 2013). The prevailing scientific opinion on climate change is that "most of the warming observed over the last 60 years is attributable to human activities" (IPCC 2013). Increased amounts of CO_2 and other greenhouse gases (GHGs) are the primary causes of the human-induced component of warming. The observed warming effect associated with the presence of GHGs in the atmosphere (from either natural or human

[43] The troposphere is the zone of the atmosphere characterized by water vapor, weather, winds, and decreasing temperature with increasing altitude.

sources) is often referred to as "the greenhouse effect."[44] GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced GCC are:[45]

CO_2

Methane (CH_4)

Nitrous oxide (N_2O)

Hydrofluorocarbons (HFCs)

Perfluorocarbons (PFCs)

Sulfur hexafluoride (SF_6)

Over the last 200 years, human activities have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which some scientists believe can cause global warming. While GHGs produced by human activities include naturally occurring GHGs such as CO_2, CH_4, and N_2O, some gases, like HFCs, PFCs, and SF_6, are completely new to the atmosphere. Certain other gases (e.g., water vapor) are short-lived in the atmosphere compared to these GHGs, which remain in the atmosphere for significant periods of time and contribute to climate change in the long term. Water vapor is generally excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes (e.g., oceanic evaporation). For the purposes of this air quality study, the term "GHGs" will refer collectively to the six gases identified in the bulleted list above. These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is based on several factors, including the relative effectiveness of a gas in absorbing infrared radiation and the length of time the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG. The definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of metric tons[46] of "CO_2 equivalents" (MT CO_2e). For example, N_2O is 265 times more potent at contributing to global warming than CO_2. **Table 3.7-1** identifies the GWP for each GHG analyzed in this report. The following discussion summarizes the characteristics of the six primary GHGs.

[44] The temperature on Earth is regulated by a system commonly known as the "greenhouse effect." Just as the glass in a greenhouse lets heat from sunlight in and reduces the amount of heat that escapes, GHGs like CO2, CH4, and N2O in the atmosphere keep the Earth at a relatively even temperature. Without the greenhouse effect, the Earth would be a frozen globe; thus, the naturally occurring greenhouse effect is necessary to keep our planet at a comfortable temperature.

[45] The GHGs listed are consistent with the definition in Assembly Bill 32 (Government Code 38505), as discussed later in this section.

[46] A metric ton is equivalent to approximately 1.1 tons.

Table 3.7-1
Global Warming Potential For Greenhouse Gases

Greenhouse Gas	Atmospheric Lifetime (Years)	Global Warming Potential (100-Year Horizon)
Carbon Dioxide (CO_2)	~100	1
Methane (CH_4)	12	28
Nitrous Oxide (N_2O)	121	265
Source: First Update to the Climate Change Scoping Plan, California Air Resources Board (2014).		

Carbon Dioxide. In the atmosphere, carbon generally exists in its oxidized form, as CO2. Natural sources of CO2 include the respiration (breathing) of humans, animals, and plants; volcanic outgassing; decomposition of organic matter; and evaporation from the oceans. Human-caused sources of CO2 include the combustion of fossil fuels and wood, waste incineration, mineral production, and deforestation. The Earth maintains a natural carbon balance, and when concentrations of CO2 are upset, the system gradually returns to its natural state through natural processes. Natural changes to the carbon cycle work slowly, especially compared to the rapid rate at which humans are adding CO2 to the atmosphere. Natural removal processes, such as photosynthesis by land- and ocean-dwelling plant species, cannot keep pace with this extra input of human-made CO2; consequently, the gas is building up in the atmosphere. The concentration of CO2 in the atmosphere has risen approximately 30 percent since the late 1800s (National Assessment Synthesis Team 2001). The transportation sector remains the largest source of GHG emissions in 2012, representing 36 percent of the State's GHG emission inventory. The largest emissions category within the transportation sector is on-road, which consists of passenger vehicles (cars, motorcycles, and light-duty trucks) and heavy-duty trucks and buses. Emissions from on-road sources constitute over 92 percent of the transportation sector total. Industry and electricity generation were the State's second- and third-largest categories of GHG emissions, respectively.

Methane. CH4 is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources of CH4 include fires, geologic processes, and bacteria that produce CH4 in a variety of settings (most notably, wetlands) (EPA 2010). Anthropogenic sources include rice cultivation, livestock, landfills and waste treatment, biomass burning, and fossil fuel combustion (burning of coal, oil, and natural gas, etc.). As with CO2, the major removal process of atmospheric CH4—a chemical breakdown in the atmosphere—cannot keep pace with source emissions, and CH4 concentrations in the atmosphere are increasing.

Nitrous Oxide. N2O is produced naturally by a wide variety of biological sources, particularly microbial action in soils and water. Tropical soils and oceans account for the majority of natural source emissions. N2O is also a product of the reaction that occurs between nitrogen and oxygen during fuel combustion. Both mobile and stationary combustion sources emit N2O. The quantity of N2O emitted varies according to the type of fuel, technology, and pollution control device used, as well as maintenance and operating practices. Agricultural soil management and fossil fuel combustion are the primary sources of human-generated N2O emissions in the State.

Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride. HFCs are primarily used as substitutes for O3-depleting substances regulated under the Montreal Protocol.[47] PFCs and SF6 are emitted from various industrial processes, including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. There is no aluminum or magnesium production in the State; however, the rapid growth in the semiconductor industry, which is active in the State, has led to greater use of PFCs. However, there are no known project-related emissions of these three GHGs; therefore, these substances are not discussed further in this analysis.

GHG Emissions Sources and Inventories

An emissions inventory that identifies and quantifies the primary human-generated sources and sinks of GHGs is a well-recognized and useful tool for addressing climate change. This section summarizes the latest information on global, national, State, and local GHG emission inventories. However, because GHGs persist for a long time in the atmosphere, accumulate over time, and are generally well mixed, their impact on the atmosphere and climate cannot be tied to a specific point of emission.

Global Emissions. Worldwide emissions of GHGs in 2012 totaled 29 billion metric tons of carbon dioxide equivalent per year (MT CO2e/yr) (United Nations Framework Convention on Climate Change [UNFCCC] 2015). Global estimates are based on country inventories developed as part of the programs of the UNFCCC.

United States Emissions. In 2013, the United States emitted approximately 6.7 billion MT CO2e, down from 7.3 billion MT CO2e in 2007. Of the six major sectors nationwide—electric power industry, transportation, industry, agriculture, commercial, and residential—the electric power industry and transportation sectors combined account for approximately 70 percent of the GHG emissions; the majority of the electric power industry and all of the transportation emissions are generated from direct fossil fuel combustion. In 2013, the total United States GHG emissions were approximately 9 percent less than 2005 levels (EPA 2016).

State of California Emissions. According to ARB emission inventory estimates, the State emitted approximately 459 million metric tons of CO2e (MMT CO2e) emissions in 2013. This is a decrease of 1.5 MMT CO2e from 2012 and a 7 percent decrease since 2004 (ARB 2015). The ARB estimates that transportation was the source of approximately 37 percent of the State's GHG emissions in 2013, followed by electricity generation (both in-State and out-of-State) at 20 percent and industrial sources at 20 percent. The remaining sources of GHG emissions were residential and commercial activities at 9 percent, agriculture at 8 percent, high-GWP gases at 4 percent, and recycling and waste at 2 percent (ARB 2015). The ARB is responsible for developing the State GHG Emission Inventory. This inventory estimates the amount of GHGs emitted to and removed from the atmosphere by human activities within the State and supports the Assembly Bill (AB) 32 Climate Change Program. The ARB's current GHG emission

[47] The Montreal Protocol is an international treaty that was approved on January 1, 1989, and was designated to protect the O3 layer by phasing out the production of several groups of halogenated hydrocarbons that are believed to be responsible for O3 depletion and are also potent GHGs.

inventory covers the years 1990–2013 and is based on fuel use, equipment activity, industrial processes, and other relevant data (e.g., housing, landfill activity, agricultural lands). The ARB staff has projected statewide unregulated GHG emissions for 2020, which represent the emissions that would be expected to occur in the absence of any GHG reduction actions, at 509 MMT CO_2e. GHG emissions from the transportation and electricity sectors as a whole are expected to increase but remain at approximately 30 percent and 32 percent of total CO_2e emissions, respectively (ARB 2014).

International and Federal Regulations

U.S. Environmental Protection Agency (USEPA). The USEPA 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.[48] In December 2009, USEPA 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 U.S. EPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. This could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon in 2016. 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, investments in renewable energy sources, adaptation programs, and leading international efforts to address climate change. In September 2013, USEPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants.

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

Energy Independence and Security Act (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:

- 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.

- 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.

- While superseded by NHTSA and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy

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

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."

The Current Administration

President Trump and USEPA Secretary Scott Pruitt have stated their intent to halt various federal regulatory activities to reduce GHG emission. California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives. The timing and consequences of these types of federal decisions and potential responses from California and other states are speculative at this time.

California Climate Action Milestones

AB 4420. In 1988, AB 4420 directed the California Energy Commission (CEC) to report on "how global warming trends may affect the State's energy supply and demand, economy, environment, agriculture, and water supplies" and offer "recommendations for avoiding, reducing and addressing the impacts." This marked the first statutory direction to a State agency to address climate change.

Climate Action Registry. The California Climate Action Registry was created to encourage voluntary reporting and early reductions of GHG emissions with the adoption of Senate Bill (SB) 1771 in 2000. The CEC was directed to assist by developing metrics and identifying and qualifying third-party organizations to provide technical assistance and advice to GHG emission reporters. The next year, SB 527 amended SB 1771 to emphasize third-party verification.

SB 1711. SB 1711 also contained several additional requirements for the CEC, including (1) updating the State's GHG inventory from an existing 1998 report and continuing to update it every 5 years; (2) acquiring, developing, and distributing information on GCC to agencies and businesses; (3) establishing a State interagency task force to ensure policy coordination; and (4) establishing a climate change advisory committee to make recommendations on the most equitable and efficient ways to implement GCC requirements. In 2006, AB 1803 transferred preparation of the inventory from the CEC to the ARB by AB 1803. The ARB updates the inventory annually.

AB 1493. AB 1493, authored by Assembly Member Fran Pavley in 2002, directed the ARB to adopt regulations to achieve the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles. The so-called "Pavley" regulations, or Clean Car regulations, were approved by the ARB in 2004. The ARB submitted a request to the EPA to implement the regulations in December 2005. After several years of requests to the federal government and accompanying litigation, this waiver request was granted on June 30, 2009. The ARB has since combined the control of smog-causing pollutants and GHG emissions to develop a single

coordinated package of standards known as Low Emission Vehicles III. It is expected that these regulations will reduce GHG emissions from State passenger vehicles by approximately 22 percent in 2012 and approximately 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs. AB 1493 also directed the State's Climate Action Registry to adopt protocols for reporting reductions in GHG emissions from mobile sources prior to the operative date of the regulations.

SB 812. SB 812 added forest management practices to the State's Climate Action Registry members' reportable emissions actions. It also directed the registry to adopt forestry procedures and protocols to monitor, estimate, calculate, report, and certify CO stores and CO_2 emissions that resulted from the conservation and conservation-based management of forests in the State.

Renewable Portfolio Standards. The California Renewable Portfolio Standard Program, which requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet 20 percent of their retail sales with renewable power by 2017, was established by SB 1078 in 2002. The Renewable Portfolio Standard was accelerated to 20 percent by 2010 by SB 107 in 2006. The program was subsequently expanded by the renewable electricity standard approved by the ARB in September 2010, requiring all utilities to meet a 33 percent target by 2020. The renewable electricity standard is projected to reduce GHG emissions from the electricity sector by at least 12 MMT CO_2e in 2020.

Executive Order S-20-04. In December 2004, Governor Arnold Schwarzenegger signed Executive Order (EO) S-20-04, which set a goal of reducing energy use in State-owned buildings by 20 percent by 2015 (from a 2003 baseline) and encouraged cities, counties, schools, and the private sector to take all cost-effective measures to reduce building electricity use. This action built upon the State's strong history of energy-efficiency efforts that have saved Californians and State businesses energy and money for decades. They are a cornerstone of GHG reduction efforts. Executive Order S-3-05. EO S-3-05 (June 2005) established GHG targets for the State such as: returning to year 2000 emission levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. It directed the Secretary of CalEPA to coordinate efforts to meet the targets with the heads of other State agencies. This group became the Climate Action Team.

Million Solar Roofs. California's Million Solar Roofs plan was boosted by the passage of SB 1 in 2006. The plan is estimated to result in 3,000 megawatts (MW) of new electricity generating capacity and avoidance of 2.1 MMT CO_2e emissions. The main components of the bill included expanding the program to more customers, requiring the State's municipal utilities to create their own solar rebate programs, and making solar panels a standard option on new homes.

AB 32. The California Global Warming Solutions Act of 2006, best known by its bill number, AB 32, created a first-in-the-country comprehensive program to achieve real, quantifiable, and cost-effective reductions in GHGs. The law set an economy-wide cap on the State's GHG emissions at 1990 levels by 2020. It directed the ARB to prepare, approve, and implement a Scoping Plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions.

Executive Order S-20-06. EO S-20-06, signed in October 2006, directed the Secretary for Environmental Protection to establish a Market Advisory Committee of national and international experts. The committee made recommendations to the ARB on the design of a market-based program for GHG emissions reduction.

Scoping Plan. The ARB adopted the first Scoping Plan, describing a portfolio of measures to achieve the target, in December 2008. All of the major regulatory measures necessary for meeting the 2020 emissions target were adopted by December 2010. The ARB approved the First Update to the Climate Change Scoping Plan (Update) on May 22, 2014. The Update identifies the next steps for California's climate change strategy. It shows how California continues on its path to meet the near-term 2020 GHG limit, but also sets a path toward long-term, deep GHG emission reductions. The report establishes a broad framework for continued emission reductions beyond 2020, with a goal of 80 percent below 1990 levels by 2050. The Update identifies progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities climate for the next several years. The Update does not set new targets for the State but rather describes a path that would achieve the long-term 2050 goal of EO S-05-03 for emissions to decline to 80 percent below 1990 levels by 2050.

Western Climate Initiative. The governors of California, Arizona, New Mexico, Oregon, and Washington entered into a Memorandum of Understanding in February 2007 establishing the Western Climate Initiative. The governors agreed to set a regional goal for emissions reductions consistent with state-by-state goals; develop a design for a regional market-based multi-sector mechanism to achieve the goals; and participate in a multi-state GHG registry. The initiative has since grown to include Montana, Utah, and the Canadian provinces of British Columbia, Manitoba, Ontario, and Québec.

Executive Order S-01-07. California is implementing the world's first Low Carbon Fuel Standard for transportation fuels, pursuant to both EO S-01-07 (signed January 2007) and AB 32. The standard requires a reduction of at least 10 percent in the CO intensity of the State's transportation fuels by 2020. This reduction is expected to reduce GHG emissions in 2020 by 17.6 MMT CO_2e.

AB 118. AB 118 created the Alternative and Renewable Fuel and Vehicle Technology Program. The CEC and the ARB administer the program. This act provides funding for alternative fuel and vehicle technology research, development, and deployment in order to attain the State's climate change goals, achieve the State's petroleum reduction objectives and clean air and GHG emission reduction standards, develop public-private partnerships, and ensure a secure and reliable fuel supply.

SB 375. In addition to vehicle emissions regulations and the Low Carbon Fuel Standard, the third effort to reduce GHG emissions from transportation is the reduction in the demand for personal vehicle travel (i.e., vehicle miles traveled, or VMT). This measure was addressed in September 2008 through the Sustainable Communities and Climate Protection Act of 2008, or SB 375. The enactment of SB 375 initiated an important new regional land use planning

process to mitigate GHG emissions by integrating and aligning planning for housing, land use, and transportation for California's 18 MPOs. The bill directed the ARB to set regional GHG emission reduction targets for most areas of the State. It also contained important elements related to federally mandated regional transportation plans and the alignment of State transportation and housing planning processes.

SB 97. Also codified in 2008, SB 97 required the Governor's Office of Planning and Research (OPR) to develop GHG emissions criteria for use in determining project impacts under CEQA. The amendments to the CEQA Guidelines for addressing GHG emissions were adopted on December 30, 2009, and became effective on March 18, 2010. The amended guidelines do not establish quantitative thresholds but instead provide qualitative thresholds for comparison.

Executive Order S-13-08. EO S-13-08 launched a major initiative for improving the State's adaptation to climate impacts from sea level rise, increased temperatures, shifting precipitation, and extreme weather events. It ordered a California Sea Level Rise Assessment Report to be requested from the National Academy of Sciences. It also ordered the development of a Climate Adaptation Strategy. The strategy, published in December 2009, assesses the State's vulnerability to climate change impacts and outlines possible solutions that can be implemented within and across State agencies to promote resiliency. The strategy focused on seven areas: public health, biodiversity and habitat, ocean and coastal resources, water management, agriculture, forestry, and transportation and energy infrastructure.

Title 24 (California Green Building Code). California Green Building Standards Code (CALGreen Code) (California Code of Regulations, Title 24, Part 11) are updated on an approximate three-year cycle. The 2016 Standards improve upon the 20013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2016 Standards went into effect July 1, 2017. The Code applies to all new constructed residential, nonresidential, commercial, mixed-use, and State-owned facilities, as well as schools and hospitals. CALGreen Code is comprised of Mandatory Residential and Nonresidential Measures and more stringent Voluntary Measures (TIERs I and II). Mandatory measures are required to be implemented on all new construction projects and consist of a wide array of green measures concerning project site design, water use reduction, improvement of indoor air quality, and conservation of materials and resources. The CALGreen Code refers to Title 24, Part 6, compliance with respect to energy efficiency; however, it encourages15 percent energy use reduction over that required in Part 6. Voluntary Measures are optional, more stringent measures that may be used by jurisdictions to enhance their commitment towards green and sustainable design and achievement of AB 32 goals. Under TIERs I and II, all new construction projects are required to reduce energy consumption by 15 percent and 30 percent, respectively, below the baseline required under the California Energy Commission, as well as implement more stringent green measures than those required by mandatory code.

Executive Order B-30-15. On April 29, 2015, Governor Edmund G. Brown Jr. issued EO B-30-15 to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. The Governor's EO aligns California's GHG reduction targets with those of leading international governments ahead of the United Nations Climate Change Conference in Paris set for late

2015. The EO sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050, and directs the ARB to update the Climate Change Scoping Plan to express the 2030 target in terms of MMT CO_2e. The EO also requires the State's climate adaptation plan to be updated every 3 years and for the State to continue its climate change research program, among other provisions. As with EO S-3-05, this EO is not legally enforceable against local governments and the private sector. Legislation that would update AB 32 to make post-2020 targets and requirements a mandate is in process in the State Legislature.

Development of Longer Term GHG Reduction Goals. California is continuing research and work to implement the goal of Executive Order S-3-05 to further reduce GHG emissions by 80 percent below 1990 levels by 2050. CARB officials at a November 20, 2014 board meeting discussed their plan to prepare a mid-term update to CARB's Scoping Plan, the document that describes how California will reduce GHG in compliance with the AB 32. Although CARB had just released its updated Scoping Plan in May 2014, it is planning a mid-term update to produce a more coherent, integrated energy plan and to inform the path to creating and meeting the 2030 interim target established in Executive Order B-30-15. Further, the Climate Action Team released in February 2015 a report entitled "Climate Change Research Plan for California." The research plan outlines a comprehensive research agenda for the next five years to determine appropriate methods to accurately monitor, project, model, and reduce GHG emissions.

California Supreme Court Decision in Center for Biological Diversity v. California Dep't of Fish and Wildlife (Newhall) 62 Cal.4th 204 (2015). This decision set forth several options that lead agencies may consider for evaluating the cumulative significance of a proposed project's GHG emissions:

1. A calculation of emissions reductions compared to a "business as usual" (BAU) scenario based upon the emissions reductions in CARB's Scoping Plan, including examination of the data to determine what level of reduction from BAU a new land use development at the proposed location must contribute in order to comply with statewide goals.

2. A lead agency might assess consistency with AB 32's goals by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities.

3. Use of geographically specific GHG emission reduction plans to provide a basis for tiering and streamlining of project-level CEQA analysis.

4. A lead agency may rely on existing numerical thresholds of significance for GHG emissions, though use of such thresholds is not required.

The initiatives, EOs, court decisions, and statutes outlined above comprise the major milestones in California's efforts to address climate change through coordinated action on climate research, GHG mitigation, and climate change adaptation. There are numerous other related efforts that have been undertaken by State agencies and departments to address specific questions and

programmatic needs. The Climate Action Team coordinates these efforts and others, which comprise the State's climate program.

Senate Bill 32. Signed in September 2016, SB 32 amends the Global Warming Solutions Act of 2006 to include this new 2030 target for GHG emissions reductions. Under Senate Bill 32, CARB is required to ensure that GHG emissions are reduced to 40 percent below the 1990 level by 2030.

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 CO_2 equivalent ($MTCO_2e$) 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 that recommended a screening threshold of 3,500 $MTCO_2e$ for residential projects, 1,400 $MTCO_2e$ for commercial projects, and 3,000 $MTCO_2e$ for mixed use projects. Additionally, the Working Group identified project-level efficiency target of 4.8 $MTCO_2e$ per service population as a 2020 target and 3.0 $MTCO_2e$ per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 $MTCO_2e$ and the plan-level target for 2035 was 4.1 $MTCO_2e$. The SCAQMD has not established a timeline for formal consideration of these thresholds.[49] In the meantime, the project level thresholds are used as a non-binding guide.

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.

SCAG Regional Transportation Plan/Sustainable Communities Strategy. SCAG"s RTP/SCS calls for concentrating future development and providing higher intensity development in proximity to transit hubs in order to reduce vehicle miles traveled and GHG emissions from personal vehicles. 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."[50]The RTP/SCS also includes an appendix listing examples of

[49] SCAG, Final PEIR for the 2016-2040 RTP/SCS, Appendix G. Accessible at http://rtpscs, scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf.

[50] California Gov't. Code §65080(b)(2)(E).

measures that could reduce impacts from planning, development and transportation.[51] 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. On April 7, 2016, SCAG adopted its 2016-2040 RTP/SCS update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040. The RTP/SCS also includes a number of measures designed to reduce the potential of development to conflict with AB 32 or any other plan designed to reduce GHG.[52] These measures are particularly important where streamlining mechanisms under SB 375 are utilized.

Local (City of Los Angeles)

Green LA Plan. 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. This Plan included goals for energy, water, transportation, land use, waste, port, airport, and related sources.

ClimateLA Implementation Plan. To implement the Green LA Plan, the City published "ClimateLA", which included a baseline GHG emissions inventory for the City, identified enforceable strategies, and provided a means to monitor and report on progress toward the 2030 goal of reducing GHG emissions by 35 percent from 1990 levels. To achieve these goals, the City developed goals, including the following:

- Green Building: The program includes a goal calling for Los Angeles to be a worldwide leader in green buildings. Action E6 calls for a comprehensive set of green building policies to guide and support private sector development.

- Energy: Increase the amount of renewable energy provided by the Los Angeles Department of Water and Power, present a comprehensive set of green building policies to guide and support private sector development, reduce energy consumed by City facilities, utilize solar heating where applicable, and help citizens to use less energy.

- Waste: Reduce or recycle 70 percent of trash by 2015.

[51] 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.

[52] Southern California Association of Governments, Final PEIR, 2016-2040 RTP/SCS, Chapter 3.8.

- Open Space and Greening: Create 35 new parks, revitalize the Los Angeles River to create open space opportunities, plant one million trees, identify opportunities to "daylight" streams, identifying promising locations for stormwater infiltration to recharge groundwater aquifers, and collaborate with schools to create more neighborhood parks.

Mobility 2035 Plan. On January 20, 2016, the City adopted its Mobility 2035 Plan, the Circulation Element of its General Plan. The Plan focuses on developing a multi-modal transportation system that can address the City's mobility needs through 2035. The Plan calls for strategies that advance five goals: 1) Safety First, 2) World Class Infrastructure, 3) Access for All Angelenos, 4) Collaboration, Communication, and Informed Choices, and 5) Clean Environments and Healthy Communities. While the Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. It includes a key strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled. As such, the Plan's call for integrated land use planning, clean fuel vehicles are consistent with State and regional plans calling for more compact growth in areas with transportation infrastructure.

Green Building Ordinance. The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.[53]

Thresholds For Pollutants That Affect Global Climate Change

State CEQA Guidelines Section 15064(b) provides that the "determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data," and further states that an "ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting."

The City has adopted Appendix G of the State CEQA Guidelines as the significance threshold for GHG emissions. A project would normally have a significant effect on the environment if it would:

> Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
>
> Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

On December 30, 2009, the Natural Resources Agency adopted amendments to the State CEQA Guidelines that became effective on March 18, 2010. The amendments to the State CEQA Guidelines include new requirements to evaluate GHG emissions. Pursuant to the

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

amended State CEQA Guidelines, a lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment:

1. The extent to which the project may increase (or reduce) GHG emissions compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

3. The extent to which the project complies with regulations or requirements adopted to implement an adopted statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Currently, there is no statewide GHG emissions threshold that has been used to determine potential GHG emissions impacts of a project. Threshold methodology and thresholds are still being developed and revised by air districts throughout the State. Therefore, this environmental issue remains unsettled and must be evaluated on a case-by-case basis until such time as the SCAQMD adopts significance thresholds and GHG emissions impact methodology. In the absence of a climate action plan for Los Angeles, SCAQMD thresholds, when adopted, would apply to future development in the City. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Stakeholder Working Group (Working Group).[54] Based on the last Working Group meeting (Meeting No. 15) held in September 2010, SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency (SCAQMD 2010). The applicable tier for this residential development project is Tier 3 (if GHG emissions are less than 3,500 MT CO2e/yr, project-level and cumulative GHG emissions are less than significant).

GHG Emissions Background

GHG emissions estimates are provided herein for informational purposes only, as there is no established quantified GHG emissions threshold. Bearing in mind that CEQA does not require "perfection" but instead "adequacy, completeness, and a good faith effort at full disclosure," the analysis below is based on methodologies and information available to the City and the applicant at the time this analysis was prepared. Estimation of GHG emissions in the future does not account for all changes in technology that may reduce such emissions; therefore, the estimates are based on past performance and represent a scenario that is worse than that which is likely to be encountered (after energy-efficient technologies have been implemented). While information is presented below to assist the public and decision-makers in understanding the project's potential contribution to GCC impacts, the information available to the cities is not sufficiently detailed to allow a direct comparison between particular project characteristics and particular climate change impacts, or between any particular proposed mitigation measure and any reduction in climate change impacts.

[54] SCAQMD. GHG CEQA Significance Thresholds: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significancethresholds/, accessed July 2016.

Construction and operation of project development would generate GHG emissions, with the majority of energy consumption (and associated generation of GHG emissions) occurring during the project's operation (as opposed to during its construction). Typically, more than 80 percent of the total energy consumption takes place during the use of buildings and less than 20 percent of energy is consumed during construction (United Nations Environment Programme 2007). Overall, the following activities associated with the Project could directly or indirectly contribute to the generation of GHG emissions:

Construction Activities: During construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment.

Gas, Electricity, and Water Use: Natural gas use results in the emission of two GHGs: CH_4 (the major component of natural gas) and CO_2 (from the combustion of natural gas). Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. California's water conveyance system is energy-intensive. Preliminary estimates indicate that the total energy used to pump and treat this water exceeds 6.5 percent of the total electricity used in the State per year (State of California 2008).

Solid Waste Disposal: Solid waste generated by the project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees. Landfilling, the most common waste management practice, results in the release of CH_4 from the anaerobic decomposition of organic materials. CH_4 is 25 times more potent a GHG than CO_2. However, landfill CH_4 can also be a source of energy. In addition, many materials in landfills do not decompose fully, and the carbon that remains is sequestered in the landfill and not released into the atmosphere.

Motor Vehicle Use: Transportation associated with the Project would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips.

Table 3.7-2 lists the annual CO2 emissions for each of the planned construction phases.

Architectural coatings used in construction of the project may contain VOCs that are similar to ROGs and are part of O3 precursors. However, there are no significant emissions of GHGs from architectural coatings. The architectural coating phase in **Table 3.7-2** shows GHG emissions from equipment exhaust and energy use.

Long-term operation of the Project would generate GHG emissions from area and mobile sources and indirect emissions from stationary sources associated with energy consumption. Mobile-source emissions of GHGs would include project-generated vehicle trips associated with on-site facilities and customers/visitors to the Project Site. Area-source emissions would be associated with activities such as landscaping and maintenance of proposed land uses, natural gas for heating, and other sources. Increases in stationary-source emissions would also occur

at off-site utility providers as a result of demand for electricity, natural gas, and water by the proposed uses.

Table 3.7-2
Construction Greenhouse Gas Emissions

Construction Phase		Total Regional Pollutant Emissions (MT/year)			
		CO2	CH4	N2O	CO2e
2018	Demolition	42	0	0	42
	Grading	112	0	0	112
	On-site Infrastructure	43	0	0	43
	Building Construction	179	0	0	179
	Architectural Coating	0	0	0	0
2019	Building Construction	143	0	0	143
	Paving	23	0	0	23
	Architectural Coating	15	0	0	15
Total Construction Emissions		**557**	**0**	**0**	**557**
Amortized over 30 years		**19**	**0**	**0**	**19**

Source: Compiled by LSA Associates, Inc. (August 2017).

The GHG emission estimates presented in **Table 3.7-3** shows the emissions associated with the level of development envisioned by the Project at opening. As shown in **Table 3.7-3**, the project will result in GHG emissions of 452 MT CO_2e/yr, which is 0.00452 MMT CO_2e per year (MMT CO_2e/yr). When the existing GHG emissions from current on-site uses are factored in, the net change would be an increase of 405 MT CO_2e/yr. For comparison, the existing emissions from the entire SCAG region are estimated to be approximately 176.79 MMT CO_2e/yr, and the existing emissions for the entire State are estimated at approximately 448 MMT CO_2e/yr.

Table 3.7-3
Operational Greenhouse Gas Emissions

Source	Pollutant Emissions (MT/year)					
	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Construction Amortized over 30 years	0	19	19	0	0	19
Area Sources	0	5	5	0	0	5
Energy Sources	0	121	121	0	0	121
Mobile Sources	0	280	280	0	0	280
Waste Sources	5	0	5	0	0	11
Water Sources	0	14	14	0	0	16
Total Project Emissions	**5**	**438**	**443**	**0**	**0**	**452**
Total Existing Emissions	**1**	**45**	**46**	**0**	**0**	**47**
Net New Emissions	**4**	**392**	**396**	**0**	**0**	**405**

Source: Compiled by LSA Associates, Inc. (August 2017).
Bio-CO2 = biologically generated CO2
NBio-CO2 = Non-biologically generated CO2

Energy/Natural Gas Use. Buildings represent 39 percent of the United States' primary energy usage and 70 percent of its electricity consumption (United States Department of Energy 2012). The Project would increase the demand for electricity and natural gas due to the increased building area and number of residents. The project would indirectly result in GHG emissions

from off-site electricity generation at power plants and on-site natural gas consumption (121 MT CO_2e/yr), an increase from the existing 14 MT CO_2e/yr.

Area Sources. Area sources of GHG emissions include consumer products, hearths, and landscaping. The project would result in 5 MT CO_2e/yr, an increase from the existing 4 CO_2e/yr.

Water Use. Water-related energy use consumes 19 percent of California's electricity every year (CEC 2005). Energy use and related GHG emissions are based on electricity used for water supply and conveyance, water treatment, water distribution, and wastewater treatment. The project would indirectly result in 16 MT CO_2e/yr of increased GHG emissions from the off-site electricity generation at power plants and on-site natural gas consumption an increase from the existing 2 MT CO_2e/yr.

Solid Waste Disposal. The Project would also generate solid waste during the operation phase of the project. Average waste generation rates from a variety of sources are available from the California Department of Resources Recycling and Recovery (CalRecycle). The project would indirectly result in 11 MT CO_2e/yr of GHG emissions from solid waste treatment at treatment plants, an increase from the existing 1 MT CO_2e/yr.

Mobile Sources. Mobile sources (vehicle trips and associated VMT) are the largest source of GHG emissions in California and represent approximately 38 percent of annual CO_2 emissions generated in the State.

Like most land use development projects, VMT is the most direct indicator of CO_2 emissions from the Project, and associated CO_2 emissions function as the best indicator of total GHG emissions. Emissions from vehicle exhaust would comprise 62 percent of the project's total CO_2e emissions. The project would directly result in GHG emissions from mobile sources (280 MT CO_2e/yr), an increase from the existing 47 MT CO_2e/yr. Emissions from vehicle exhaust are controlled by the State and federal governments and are outside the control of the City. The non-mobile source GHG emissions are primarily associated with building heating systems and increased regional power plant electricity generation due to the project's electrical demands. Specific development projects proposed under the Project would comply with existing State and federal regulations regarding the energy efficiency of buildings, appliances, and lighting, which would reduce the Project's electricity demand. The new buildings constructed in accordance with current energy efficiency standards would be more energy-efficient than older buildings. The 2016 California Building Standards Code (California Code of Regulations Title 24) has been enforced in California since January 1, 2017. All structures will be built under the new 2016 California Building Code to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts that have a positive environmental impact and encourage sustainable construction practices. Therefore, the Project would help conserve energy and would be consistent with the goals and initiatives of AB 32 and the City of Los Angeles Sustainable City Plan.

At present, there is a federal ban on chlorofluorocarbons (CFCs); therefore, it is assumed the Project would not generate emissions of CFCs. The project may emit a small amount of HFCs from leakage and service of refrigeration and air-conditioning equipment and from disposal at

the end of the life of the equipment. However, the details regarding refrigerants to be used at the Project Site are unknown at this time. PFCs and SF_6 are typically used in industrial applications, neither of which would be used on the Project Site. Therefore, the Project is not anticipated to contribute significant emissions of these additional GHGs.

The net increase in emissions level of 405 MT CO_2e/yr is less than the SCAQMD Tier 3 threshold of 3,500 MT CO_2e/yr for residential projects; thus, project-level and cumulative GHG emissions are less than significant. The Project would not result in GHG emissions that would have a significant impact on the environment.

b) Would the project conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact.

At the regional level, the 2016-2040 RTP and Sustainable Communities Strategy represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with the RTP/SCS, this section analyzes the Project's land use profile for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project is an infill development which is consistent with the 2016 RTP/SCS and its focus on integrated land use planning.

The Climate Action Team and the ARB have developed several reports to achieve the Governor's GHG targets that rely on voluntary actions of California businesses, local government and community groups, and State incentive and regulatory programs. These include the Climate Action Team's 2010 "Report to Governor Schwarzenegger and the Legislature," the ARB's 2007 "Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California," and the ARB's "First Update to the Climate Change Scoping Plan: Building on the Framework Pursuant to AB 32, the California Global Warming Solutions Act of 2006."

The reports identify strategies to reduce California's emissions to the levels proposed in EO S-3-05 and AB 32 that are applicable to the Project. The Scoping Plan that was adopted in 2008 and updated in 2014 is the most recent document, and the strategies included in the Scoping Plan that apply to the Project are contained in **Table 3.7-4**, which also summarizes the extent to which the project would comply with the strategies to help California reach the emission reduction targets. The strategies listed in **Table 3.7-4** are either part of the project design or requirements under local or State ordinances.

With application of regulatory requirements, the Project would not conflict with or impede implementation of the reduction goals identified in AB 32 and SB 32. Therefore, the Project's contribution to cumulative GHG emissions would be less than significant.

Table 3.7-4
Project Compliance with Scoping Plan's GHG Emissions Reduction Strategies

Strategy	Project Compliance
Energy Efficiency Measures	
Energy Efficiency. Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities). **Renewables Portfolio Standard**. Achieve a 33 percent renewable energy mix statewide. **Green Building Strategy**. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Compliant**. The project will comply with the updated Title 24 standards, including the 2013 CBC, for building construction.
Water Conservation and Efficiency Measures	
Water Use Efficiency. Continue efficiency programs and use cleaner energy sources to move and treat water. Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions.	**Compliant**. The project will comply with the updated Title 24 standards, including the 2013 CBC, for building construction.
Solid Waste Reduction Measures	
Increase Waste Diversion, Composting, and Commercial Recycling, and Move Toward Zero-Waste. Increase waste diversion from landfills beyond the 50 percent mandate to provide for additional recovery of recyclable materials. Composting and commercial recycling could have substantial GHG reduction benefits. In the long term, zero-waste policies that would require manufacturers to design products to be fully recyclable may be necessary.	**Compliant**. Data available from CalRecycle indicate that the City of Los Angeles (Los Angeles County) has achieved the 50 percent diversion rate.
Transportation and Motor Vehicle Measures	
Vehicle Climate Change Standards. AB 1493 (Pavley) required the State to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles and light-duty trucks. Regulations were adopted by the ARB in September 2004. **Light-Duty Vehicle Efficiency Measures**. Implement additional measures that could reduce light-duty GHG emissions. For example, measures to ensure that tires are properly inflated can both reduce GHG emissions and improve fuel efficiency. **Adopt Heavy- and Medium-Duty Fuel and Engine Efficiency Measures**. Regulations to require retrofits to improve the fuel efficiency of heavy-duty trucks that could include devices that reduce aerodynamic drag and rolling resistance. This measure could also include hybridization of and increased engine efficiency of vehicles. **Low Carbon Fuel Standard**. ARB identified this measure as a Discrete Early Action Measure. This measure would reduce the carbon intensity of	**Compliant**. The project does not involve the manufacture of vehicles. However, vehicles that are purchased and used within the project site would comply with any vehicle and fuel standards that the ARB adopts

Table 3.7-4
Project Compliance with Scoping Plan's GHG Emissions Reduction Strategies

Strategy	Project Compliance
California's transportation fuels by at least 10 percent by 2020.	
Regional Transportation-Related Greenhouse Gas Targets. Develop regional GHG emissions reduction targets for passenger vehicles. Local governments will play a significant role in the regional targets. Local governments have the ability to directly influence both the siting and design of new residential and commercial developments in a way that reduces GHGs associated with vehicle travel.	**Compliant**. Specific regional emission targets for transportation emissions do not directly apply to this project; regional GHG reduction planning process to reach passenger vehicle GHG emissions reduction target development is outside the scope of this project. The project will comply with any plans developed by the City of Los Angeles and Los Angeles County.
Measures to Reduce High-GWP Gases. ARB has identified Discrete Early Action measures to reduce GHG emissions from the refrigerants used in car air conditioners, semiconductor manufacturing, and consumer products. ARB has also identified potential reduction opportunities for future commercial and industrial refrigeration, changing the refrigerants used in auto air conditioning systems, and ensuring that existing car air conditioning systems do not leak.	**Compliant**. New products used or serviced on the project site (after implementation of the reduction of GHGs) would comply with future ARB rules and regulations
Applicable to a residential development. Source: CAJA, August 2017.	

8. HAZARDS AND HAZARDOUS MATERIALS

This section is based, in part, on the following items included as Appendix F of this IS/MND:

F-1 Phase I Environmental Site Assessment Report, 10877-10921 Old Santa Susana Pass Road, Partner, March 4, 2016.

F-2 Phase I Environmental Site Assessment Report, 10811-10821 Old Santa Susana Pass Road, Partner, August 4, 2016.

In 2015, the California Supreme Court in CBIA v. BAAQMD (2015) 62 Cal.4th 369, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. However, the decision also held that when a proposed project could potentially exacerbate environmental hazards or conditions that already exist, an analysis of the potential impact of such hazardous conditions on future residents or users is required. In those limited instances, the project's impact on the environment not the environment's impact on the project, must be evaluated to determine how the project's future residents or users could be affected by exacerbated conditions. The revised thresholds are intended to comply with this decision.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact.

A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any residential project. All of these materials would be used temporarily during construction. Thus, construction of the Project would not involve the routine transport, use, or disposal of hazardous materials.

Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Finally, the construction activities are contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Construction hauling would be conducted according to existing standards and regulations for trucks carrying demolition debris and soils. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards. Potential impacts associated with the potential release of hazardous substances during construction of the Project would be less than significant.

Similarly, from an operational perspective, the Project would not involve the routine use, transport, or disposal of hazardous materials. The Project would include the development of residential uses. These uses do not involve the routine use of hazardous materials**.** Instead, the operation of the Project would have limited hazardous materials similar to any other residential development. For example, the proposed uses would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping. The Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational uses, or the type of hazardous materials used on the Project Site, would create a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. In addition, the Project would be required to comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. Therefore, potential impacts associated with the operation of the Project would be less than significant.

The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Therefore, potential impacts associated with the minimal transport of any hazardous materials would also be less than significant.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact.

A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

The Site was evaluated in two Phase I reports: the Western Portion (west of Bee Canyon, 10811-10821 Old Santa Susana) and the Eastern Portion (east of Bee Canyon, 10877-10921 Old Santa Susana).

Historical Information

Western Portion

According to available historical sources, the western portion was undeveloped in the early 1900s. A creek, Santa Susana Pass Creek, intersected the northern portion of the site. By the 1920s, the site was developed with residential and auxiliary structures on the eastern portion of the property, and the remaining portions were agricultural/orchard land. Between 1967 and 1969, the western portion was cleared and appears to have been used as an equestrian area with associated structures. A culvert was built for the Santa Susana Pass Creek, which intersects the northern portion of the property via an easement. The eastern areas of the site were developed with additional residential/auxiliary structures. The site has been used for residential purposes with auxiliary structures and equestrian areas since the late 1960s.[55]

Eastern Portion

Tenants on the eastern portion have included various residential tenants (1917-Present), and an equestrian center in the early 1980s. The parcel was historically used for agricultural purposes. There is a potential that agricultural related chemicals such as pesticides, herbicides, and fertilizers, may have been used and stored onsite. The subject property is either paved over or covered by building structures that minimize direct contact to any potential remaining concentrations in the soil. Additionally, during previous site development activities, near surface soils (where residual agricultural chemical concentrations would have most likely been present, if at all) were generally mixed with fill material or disturbed during grading. Also, it is common that engineered fill material is placed over underlying soils as part of the development activities. Furthermore, it is likely that residual agricultural chemicals (if any) would have likely degraded since the site was last utilized for agricultural purposes. These additional variables serve to further reduce the potential for exposure to residual agricultural chemicals (if any). Based on these reasons, Partner concludes that the possible former use of agricultural chemicals is not expected to represent a significant environmental concern at this time. No other potential environmental concerns were identified in association with the current or former use of the site.[56]

Potential Environmental Hazards

No hazardous substances or petroleum products were observed on the Site (Western and Eastern portions) during the site reconnaissance.

No evidence of current or former Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs or USTs) was observed on the Site (Western and Eastern portions) during the site reconnaissance.

No spills, stains or other indications that a surficial release has occurred at the Site (Western and Eastern portions) were observed.

[55] Phase I Environmental Site Assessment Report, 10811-10821 Old Santa Susana Pass Road, Partner, August 4, 2016.
[56] Phase I Environmental Site Assessment Report, 10877-10921 Old Santa Susana Pass Road, Partner, March 4, 2016

No potential Polychlorinated Biphenyls (PCB)-containing equipment (transformers, oil-filled switches, hoists, lifts, dock levelers, hydraulic elevators, etc.) was observed on the Site (Western and Eastern portions) during Partner's reconnaissance.

No strong, pungent or noxious odors were evident on the Site (Western and Eastern portions) during the site reconnaissance.

No pools of liquid were observed on the Site (Western and Eastern portions) during the site reconnaissance.

No drains, sumps, or clarifiers, other than those associated with storm water removal, were observed on the Site (Western and Eastern portions) property during the site reconnaissance.

No pits, ponds or lagoons were observed on the Site (Western and Eastern portions).

No stressed vegetation was observed on the Site (Western and Eastern portions).

No additional environmental hazards, including landfill activities or radiological hazards, were observed.

Asbestos and Lead

Based on the age of the onsite structures, there is a potential for asbestos containing building materials (ACM) and lead-based paint (LBP) at the site. The Project would comply with the following regulations related to ACMs and LBP:

- If asbestos containing building materials are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

- If lead-based paint materials are found to be present, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.

Methane

The City of Los Angeles Methane Zone map was reviewed to determine if the Site is located in a methane or methane buffer zone. According to the map reviewed, the Site is not located within a methane zone.[57]

Findings

[57] http://zimas.lacity.org/

A **recognized environmental condition (REC)** refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

- Partner did not identify any RECs on the Site (Western and Eastern portions).

A **controlled recognized environmental condition (CREC)** refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

- Partner did not identify any CRECs on the Site (Western and Eastern portions).

A **historical recognized environmental condition (HREC)** refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

- Partner did not identify any HREC on the Site (Western and Eastern portions).

An **environmental issue** refers to environmental concerns identified by Partner, which do not qualify as RECs; however, warrant further discussion.

- The Western Portion was historically used for agricultural purposes. There is a potential that agricultural related chemicals such as pesticides, herbicides, and fertilizers, may have been used and stored onsite. It is likely that residual agricultural chemicals (if any) would have likely degraded since the site was last utilized for agricultural purposes. Based on this information, the former use of the Western Portion for agricultural purposes is not expected to constitute a significant environmental concern.

- Due to the age of the buildings on the Site (Western and Eastern portions), there is a potential that asbestos-containing material (ACM) and/or lead-based paint (LBP) are present. Suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants.

- A domestic well system was observed adjacent to one of the residential structures at 10811 Old Susana Pass Road. Partner was not provided with sampling data confirming the quality of water within the well system and was unable to confirm if the system was in operation.

Conclusions, Opinions and Recommendations

The Phase I assessment has revealed no evidence of recognized environmental conditions in connection with the Western; however, environmental issues were identified. Based on the

conclusions of the assessment, Partner recommends no further investigation of the Western Portion at this time. Based on the conclusions of the assessment, Partner recommends the following for the Eastern Portion:

- An Operations and Maintenance (O&M) Program should be implemented in order to safely manage the suspect ACMs and LBP located at the Eastern Portion.

The environmental issues related to ACM and LBP would be resolved with compliance with existing regulations for abatement, removal, and remediation.

Operational Health Hazards

Compliance with existing applicable laws would require the Site to be maintained in a neat, attractive, and safe condition at all times. On-site activities would be conducted so as not to create noise, dust, odor, or other nuisances to surrounding properties. Trash and recycling bins would be maintained with a lid in working condition; such lid would be kept closed at all times. Trash and garbage collection bins would be maintained in good condition and repair such that there are no holes or points of entry through which a rodent could enter. Trash and garbage collection containers would be emptied on a regular basis. Trash and garbage bin collection areas would be maintained free from trash, litter, garbage, and debris.

Compliance with existing applicable laws would ensure that impacts during construction and operation would be less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact.

A project-related significant adverse effect may occur if the project is located within 0.25-mile (1,320 feet) of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The Project Site is within one-quarter mile of the following schools:[58]

- Meraj Academy, 11070 Old Santa Susana, 400 feet north of the Project Site.

- Academy for Advancement of Children with Autism, 10824 Topanga Canyon, 550 feet southeast of the Project Site.

The Project would have a less than significant impact during the demolition, rehabilitation, and new construction (regulatory compliance for the removal of asbestos and lead-based paint) and, as discussed above, would not emit any hazardous substances during operation. The schools would be generally shielded from the Project Site by the distance noted above, intervening buildings, and standard LADBS-required construction walls and sheeting to reduce dust and

[58] LAUSD and Google Maps.

other emissions from the Project Site. Therefore, impacts of hazardous materials within one-quarter mile of a school will be less than significant.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

Less Than Significant Impact.

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the Project Site is included on any of the above- referenced lists (see question b), above) and would therefore pose an environmental hazard to the public or the environment. In meeting the provisions in Government Code Section 65962.5, commonly referred to as the "Cortese List," database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency.

Mapped Database Records Search

The Western Portion is not identified in the regulatory database report.[59]

The Eastern Portion is not identified in the regulatory database report.[60]

The adjacent properties are not identified in the regulatory database report. No sites of concern are identified in the regulatory database report. No orphan listings of concern are identified in the regulatory database report.

According to EnviroStor, there are no cleanup sites, permitted sites, or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site.[61]

According to GeoTracker, there are no other cleanup sites, land disposal sites, military sites WDR sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.[62]

[59] Phase I Environmental Site Assessment Report, 10811-10821 Old Santa Susana Pass Road, Partner, August 4, 2016.
[60] Phase I Environmental Site Assessment Report, 10877-10921 Old Santa Susana Pass Road, Partner, March 4, 2016
[61] California Department of Toxic Substance Control, EnviroStor, website: http://www.envirostor.dtsc.ca.gov/public/, accessed August 24, 2017.
[62] California State Water Resources Control Board, GeoTracker, website: http://geotracker.waterboards.ca.gov/map, accessed August 24, 2017.

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.[63] There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.[64] The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.[65]

As described above, the geophysical survey did not identify evidence of current USTs or significant former excavation pits commonly associated with former UST installations. The site is free of any hydrocarbon substances and further environmental efforts such as investigation or remediation is deemed unnecessary. Therefore, the Project would not create a significant hazard to the public or the environment, and impacts are less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact.

A significant project-related impact may occur if a project were placed within a public airport land use plan area or within two miles of a public airport, and subject to a safety hazard. The Project is not within an airport hazard area.[66] The Project Site is located 7.5 miles west of the Van Nuys Airport. In addition, the height of the building is not sufficiently high or unique to affect flight paths. Due to these circumstances, no impact would occur.

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?

No Impact.

This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. There are no nearby private airstrips. Therefore, no impacts will occur.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact.

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63 California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf, accessed August 24, 2017.

64 California Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: http://www.calepa.ca.gov/sitecleanup/corteselist/, August 24, 2017.

65 California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities, August 24, 2017.

66 ZIMAS search: http://zimas.lacity.org/.

A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. Construction of the Project will not substantially impede public access or travel on public rights-of-way such as Topanga Canyon, and would not interfere with any adopted emergency response plan or emergency evacuation plan.

In addition, there are no emergency services located within the immediate vicinity of the Project Site. Major roadways throughout the City, including Topanga Canyon, are selected disaster routes.[67] Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes. The Project will not impede the routes, and emergency access would be maintained at all times.

Based on the nominal level of net new project-related traffic, the Project will not produce significant impacts at any of the intersections or streets in the project vicinity.[68]

The Project Site (Western Portion) is within a Hillside Area, which would impose hillside-specific emergency access requirements.[69] The Site itself is not a traditional hillside (limited access, one-way streets, tight turns). The Project would comply with emergency evacuation requirements according to the LAMC and LAFD. Therefore, impacts would be less than significant.

h) Would the Project exacerbate the current environmental conditions so as bring 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?

Less Than Significant Impact.

A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is located in a Very High Fire Hazard Severity Zone[70] and in the wildlands fire hazard Mountain Fire District.[71] These areas must comply with the Brush Clearance Requirements of the LA Fire Code (LAMC Section 57.332).[72] Therefore, impacts would be less than significant.

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67 Los Angeles Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

68 Trip Generation Assessment, Hirsch/Green.

69 ZIMAS search: http://zimas.lacity.org/.

70 ZIMAS search: http://zimas.lacity.org/.

71 Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

72 http://www.lafd.org/fire-prevention/brush/clearance-requirements

9. HYDROLOGY AND WATER QUALITY

This section is based, in part, on the following items included as Appendix G of this IS/MND:

G Concept LID Plan, Stantec, January 2019.

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact.

A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements.[73] Requirements of the SUSMP are enforced through the City's plan approval and permit process.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. Ordinance No. 181,899 was adopted in 2011 to amend LAMC 64.70, the City's stormwater code, and expand the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP because it requires a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures. All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. A project must comply with the LID Best Management Practices (LID BMPs) (determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs

[73] Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities; Retail gasoline outlets"; Restaurants, Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/.

apply. Possible BMPs include: 1. Infiltration Systems; 2. Stormwater Capture and Use; 3. High Efficiency Biofiltration/Bioretention Systems; and 4. Combination of Any of the Above.

Construction

Demolition and construction activities at the Project Site have the potential to affect the quality of storm water runoff. Typically, runoff picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. There are three general sources of short-term construction-related stormwater pollution associated with the Project: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion. During construction, the Project Site would contain a variety of construction materials that are potential sources of stormwater pollution, such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Construction material spills can also be a source of stormwater pollution and/or soil contamination.

The Project will not be required to obtain a NPDES water quality permit from the LARWQCB since the discharge will be sent to the City's Stormwater System and not directly to surface waters.[74] The City is in compliance with all requirements of the NPDES Municipal Permit.[75] Compliance with the local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water.

Construction activities associated with the Project are subject to City inspection and implementation of storm water BMPs. Since the construction of the Project will disturb greater than one acre of land (the entire Site is approximately 11.92 acres)[76], the Project Applicant will not be required to obtain coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).[77] Construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LID requirements. The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards, or discharge requirements, or otherwise substantially degrade water quality. BMPs are methods to prevent or control stormwater runoff and the discharge of pollutants. The plan requires (1) advance planning and training to ensure implementation of the BMPs, (2) erosion and sediment control BMPs in place until the area is permanently stabilized, (3) pollution prevention BMPs to keep the construction

[74] http://water.epa.gov/polwaste/npdes/.

[75] http://www.lastormwater.org/about-us/npdes-municipal-permit/.

[76] See Section 2, Project Description.

[77] California Environmental Protection Agency, State Water Resources Control Board, Storm Water Program, Construction Storm Water Program, website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml, accessed August 24, 2017.

site clean and (4) regular inspection of the construction site to ensure proper installation and maintenance of BMPs.[78]

Storm Water Pollution Prevention Plan. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Low Impact Development Plan. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

Development of Best Management Practices. The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

Waste Discharge Requirements (WDR). The Regional Water Quality Control Board (RWQCB) has issued a general permit for construction dewatering (Waste Discharge Requirements for Discharges of Groundwater from Construction Projects Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties Order No. R4-2013-0095, and CAG994004). Discharges covered by this permit include but not limited to, treated or untreated groundwater generated from permanent, temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits. If dewatering is required for construction or operation the Project would have to obtain coverage under this permit.

A concept LID Plan is included as Appendix G to this MND. Construction-related impacts to water quality will be less than significant.

Operation

The Project will not include industrial discharge to any public water system. Under existing conditions, runoff at the Project Site may contain typical urban pollutants such as automotive fluids (including oil and grease) commercial cleaning and landscaping pollutants discharged into the storm drainage system. Because there would be no substantial change in the type of runoff

[78] http://www.lastormwater.org/about-us/regulatory-mandates/

as a result of the Project (which would continue to have automobiles, cleaning supplies, and similar elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type than that which currently exists. The parking for the Project would be located within each garage and not subject to rain that can create runoff.

The Project Site is bisected by an existing rectangular concrete-lined channel referred to as Santa Susana Creek. The proposed improvements will convey storm water into private streets and a storm drain line that will discharge into the Santa Susana Creek channel. Existing drainage patterns will be maintained with this system. Approximately 4% of the site is impervious in its existing condition and the proposed development will be approximately 25% impervious. While proposed site improvements will result in an increase in impervious areas, the post-development peak flow rates will not increase from pre-development peak flow rates. This is a result of the project improvements removing the debris factor which will in turn reduce the burned and bulked flow rate, as well as, the implementation of Low Impact Development (LID) Best Management Practices (BMPs). A Low Impact Development (LID)/Standard Urban Storm Water Mitigation Plan (SUSMP) will be prepared to demonstrate compliance with the Los Angeles City LID Requirements. Infiltration of storm water has been determined to be infeasible due to the risk of liquefaction hazards. Therefore, anticipated Best Management Practices (BMPs) include stormwater capture and use and high efficiency biofiltration/biotreatment. The high efficiency biofiltration/biotreatment BMPs will be sized to adequately capture 1.5 times the volume not managed through capture and use BMPs.[79]

In addition, design criteria as established in the SUSMP would be incorporated into the Project to minimize the off-site conveyance of pollutants. Therefore, operation-related impacts to water quality will be less than significant.

b) Would the project 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)?

Less Than Significant Impact.

A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site or nearby.

Groundwater was encountered during Albus-Keefe's subsurface exploration as shallow as about 29 feet below the existing ground surface in boring B-8. Groundwater was also encountered at a depth of approximately 30 feet below the ground surface by Krazen and Associates, Inc. (2016) during their site investigation. A review of the CDMG Seismic Hazard

[79] Stantec, August 2017.

Zone Report 05 indicates that historical high groundwater level for the general site area is reported as shallow as approximately 40 feet below the existing ground surface. Local historically high groundwater is estimated to be at a depth of 25 feet below ground surface. [80]

Based on the depth of proposed construction, groundwater is neither expected to be encountered during construction, nor have an impact on the design of the structure. It should be noted that it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. Proper surface drainage of irrigation and precipitation will be critical for future performance of the Project.

A public water system operated by LADWP serves the Project Site. The sources of public water for the City of Los Angeles are surface water from California Water Project and Colorado River purchased through the Metropolitan Water District (MWD) and groundwater.[81]

A water well is present in the northeasterly portion of the western portion. ALTA survey also indicates a well within the southeasterly portion of the eastern portion and a sewer line with manhole structures just within the western margin of the site along Bee Canyon Road.

California has passed legislation that is intended to improve the quality of storm water runoff and the local water boards have placed a high priority on using infiltration to treat stormwater. California is seeking sources for renewable sources of potable water and infiltration of storm water into the groundwater aquifers is one economic way of providing this resource. Infiltration of storm water on this site, in consideration of the relatively low risk of increasing the liquefaction hazard, would replenish our groundwater aquifers.[82]

The development of the Project would not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. The Project Site is bisected by an existing rectangular concrete-lined channel referred to as Santa Susana Creek. The proposed improvements will convey storm water into private streets and a storm drain line that will discharge into the Santa Susana Creek channel. Existing drainage patterns will be maintained with this system. Approximately 4% of the site is impervious in its existing condition and the proposed development will be approximately 25% impervious. While proposed site improvements will result in an increase in impervious areas, the post-development peak flow rates will not increase from pre-development peak flow rates. This is a result of the project improvements removing the debris factor which will in turn reduce the burned and bulked flow rate, as well as, the implementation of Low Impact Development (LID) Best Management Practices (BMPs).

A LID/Standard Urban Storm Water Mitigation Plan (SUSMP) will be prepared to demonstrate compliance with the Los Angeles City LID Requirements. Infiltration of storm water has been

[80] Preliminary Geotechnical Investigation, Albus-Keefe and Associates, August 17, 2016.

[81] LADWP, Water, Sources of Water: https://www.ladwp.com/, accessed June 8, 2017.

[82] Response to City of Los Angeles Review, Albus-Keefe and Associates, February 16, 2017.

determined to be infeasible due to the risk of liquefaction hazards. Therefore, anticipated Best Management Practices (BMP's) include stormwater capture and use and high efficiency biofiltration/biotreatment. The high efficiency biofiltration/biotreatment BMPs will be sized to adequately capture 1.5 times the volume not managed through capture and use BMPs.[83] Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. Proper surface drainage is critical to the future performance of the Project. Saturation of a soil can cause it to lose internal shear strength and increase its compressibility, resulting in a change in the designated engineering properties. Proper site drainage should be maintained at all times.

Topography within the west portion of the Site gently falls to the south to southeast with surface elevations ranging from approximately 1,005 feet above mean sea level (MSL) in the northwestern margin of the parcel to 995 feet above MSL along the southern boundary of the parcel. Surface drainage generally sheet flows to the south and southeast.

The topography within the east portion falls gently to the south and southwest with surface elevations ranging from approximately 1,006 feet above mean sea level (MSL) in the northeastern margin of the parcel to 997 feet above MSL along the southern boundary of the parcel. Surface drainage generally sheet flows to the south and southwest then appears to collect in a shallow depression along Calle Milagros at the far southerly margin of the site before draining offsite at the far southwest corner.[84]

The Project Site is within a developed area of the City, which is connected to the municipally-owned separated storm sewer system (MS4); therefore, the development of the Project would not cause changes in existing drainage patterns or surface water bodies in a manner that could cause erosion or siltation. Lot 19 however, will have an onsite septic system that complies with the City's regulations for alternative wastewater disposal. The septic system is discussed under Geology and Soils, Section 6.e) above.

The Site is bisected by a north-south trending concrete-lined open box storm drainage channel (Santa Susana Creek). However, the Project will not alter this channel. Therefore, impacts related to site drainage and erosion would be less than significant.

[83] Stantec, August 2017.

[84] Preliminary Geotechnical Investigation, Albus-Keefe and Associates, August 17, 2016.

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

Less Than Significant Impact.

A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. No flooding is expected to occur on- or off-site due to the relatively flat grades of the Project Site and the vicinity. The Project Site would not be altering a stream or river. The Santa Susana Flood Channel would not be affected by the Project. Therefore, impacts related to site drainage and flooding would be less than significant.

e) Would the project 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?

Less Than Significant Impact.

A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean.

Requirements of the SUSMP are enforced through the City's plan approval and permit process. Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. It is an ordinance passed in 2011 amending LAMC 64.70 (the City's stormwater code) and expanding on the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP because it requires a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures. All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. A project must comply with the LID Best Management Practices (LID BMPSs) (determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply.

Construction

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials

containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. In addition, regulations will ensure the safe removal of asbestos and lead from the demolition and adaptive reuse. The same types of common sense, “good housekeeping” procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination.

Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. When properly designed and implemented, these “good-housekeeping” practices would reduce short-term construction-related impacts to a less than significant level by controlling dust and erosion that may occur onsite and leaks from any construction equipment. The Project would be required to comply with the LID Best Management Practices, which are determined on a case by case basis by the Department of Public Works. Approval will not be granted or issued until appropriate and applicable stormwater BMPS are incorporated into the Project design plans. Compliance with existing regulations would reduce the potential for construction water quality impacts to a less than significant level.

Operation

Activities associated with operation of the Project would not generate substances that could degrade the quality of water runoff. Impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and the City of Los Angeles (such as LID), would be incorporated into the Project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for operational water quality impacts to a less than significant level.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact.

A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Other than the sources described in the response to Question 9(e) above, the Project does not include other sources of contaminants that could substantially degrade water quality. Therefore, impacts to water quality would be less than significant.

g) Would the project 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?

Less Than Significant Impact.

This question would apply to the Project only if it were placing housing in a 100-year flood zone. Lands designated as special flood hazard areas that are identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Map (FIRM) to establish the flood risk premium zone. These areas are subject to inundation by a flood having a one-percent or greater probability of being equaled or exceeded during any given year. This flood, which is referred to as the 1% annual chance flood (or base flood), is the national standard on which the floodplain management and insurance requirements of the National Flood Insurance Program (NFIP) are based.

The eastern portion (east of Bee Canyon) is not within a Flood Zone while the western portion (west of Bee Canyon) is in an area contained in a Storm Drain.[85] A notation on the map indicates that the 1% annual chance flood discharge would be contained within the channel.[86] The Santa Susana Creek is designated part of a 100-year flood hazard area according to the Los Angeles General Plan Safety Element map.[87] Again, however, the Santa Susana Channel has resolved this and the Site would not be subject to flooding. Therefore, impacts would be less than significant.

h) Would the project place within a 100-year flood hazard area structures, which would impede or redirect flood flows?

Less Than Significant Impact.

A significant impact may occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows. According to the Federal Emergency Management Agency (FEMA) the Flood Insurance Rate Map (FIRM) 06037C1040F indicates that the Project Site is located within Flood Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain.[88] The Santa Susana Creek (Flood Zone A) is designated part of a 100-year flood hazard area according to the Los Angeles General Plan Safety Element map.[89] A notation on the map indicates that the 1% annual chance flood discharge would be contained within the channel.[90] Therefore, the Project would not be at risk of flooding and would not place structures in an area that would impede or redirect flood flows. Therefore, impacts would be less than significant.

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85 ZIMAS search: http://zimas.lacity.org/.

86 FEMA, Flood Map Service Center: https://msc.fema.gov/portal, August 24, 2017.

87 Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

88 FEMA, Flood Map Service Center: https://msc.fema.gov/portal, August 24, 2017.

89 Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

90 FEMA, Flood Map Service Center: https://msc.fema.gov/portal, August 24, 2017.

i) Would the project 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?

Less Than Significant Impact.

A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. The Site is not within a potential inundation area.[91]

The result of the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing facilities. None of the 13 dams in the greater LA area were severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake. [92]

The LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD). DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures in order to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at seepage drains, and performing a thorough visual inspection. Many LADWP reservoirs have Movement and Settlement (M&S) survey points installed on, and near, the dams. These points are periodically measured using precision survey equipment. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. At least once per year, State DSOD inspectors accompany LADWP Reservoir Surveillance personnel into the field to inspect each dam and reservoir. The Water System's Geotechnical Engineering Group maintains a program for periodically analyzing its dams and reservoirs for earthquake safety.[93]

Therefore, the dams in the Los Angeles basin, as with other dams in California, are continually monitored by various governmental agencies (such as the State of California DSOD and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected due to the location of the Project Site; thus the minimal risk of flooding from potential dam or levee failure will not

[91] Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

[92] Page II-16, Los Angeles Safety Element, http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

[93] LADWP, Water System Reservoir Surveillance Program: http://eng.lacity.org/projects/fmp/pdf/handout4_042009.pdf.

be exacerbated by the development of the Project. A less than significant impacts related to flooding would occur.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact.

A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk for the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. Mitigation of potential seiche action has been implemented by the LADWP through regulation of the level of water in its storage facilities and providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.[94]

The site is elevated more than 900 feet above sea level and is located a substantial distance from a significant body of water within an enclosed basin. As such, the potential for hazards related to seiches and tsunami are considered very low.[95]

The City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.[96] The City's General Plan Safety Element has no areas around the Project Site identified as a bedrock or probable bedrock landslide area.[97] Thus, there is no potential for mudflow. Therefore, development of the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. No impacts related to tsunamis, seiches, and mudflow would occur.

[94] Page II-16, Los Angeles General Plan Safety Element, http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

[95] Preliminary Geotechnical Investigation, Albus-Keefe and Associates, August 17, 2016.

[96] ZIMAs search: http://zimas.lacity.org/.

[97] Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed August 11, 2016.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

Less Than Significant Impact.

A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community. The Project is not of a scale or nature that would physically divide an established community. The Project is not affecting any public right-of-ways. The Project would be built on an existing infill site (surrounded by other developments). The Project's uses are compatible with the uses along Santa Susana, which are low density single-family units located on large lots. As such, impacts related to physical division of an established community would be less than significant.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact.

A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate.

The legal standard that governs consistency determinations is that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan. (See *Sequoyah Hills Homeowners Assn. v. City of Oakland (*1993) 23 Cal.App.4th 704, 717-18 [upholding a city's determination that a subdivision project was consistent with the applicable general plan]). As the Court explained in *Sequoyah*, "state law does not require an exact match between a proposed subdivision and the applicable general plan." To be "consistent" with the general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning, the project must be "in agreement or harmony with the applicable plan." (see also *Greenebaum v. City of Los* Angeles (1984) 153 Cal.App.3d 391, 406; *San Franciscans Upholding the Downtown Plan, supra*, 102 Cal.App.4th at p. 678.) Further, "[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 817.) Courts also recognize that general plans "ordinarily do not state specific mandates or prohibitions," but instead provide "policies and set forth goals." (*Friends of Lagoon Valley*).

The following is a list of applicable land use plans:

Regional Level

- *Southern California Association of Governments*
    - *Regional Comprehensive Plan and Guide (RCPG)*
    - *Regional Comprehensive Plan (RCP)*
    - *Regional Transportation Plan (RTP)*
- *SCAQMD Air Quality Management Plan (AQMP)*
- *Metro Congestion Management Plan (CMP) for Los Angeles County.*

City of Los Angeles

- *City of Los Angeles General Plan*
- *Chatsworth-Porter Ranch Community Plan*
- *ZI-1732 Council Office Notification (Rock Outcroppings)*
- *ZI-2438 Equine Keeping in the City of Los Angeles*
- *ZI-2462 Modifications to SF Zones and SF Zones Hillside Area Regulations (on APN 2723-005-030)*
- *Los Angeles Municipal Code*

Consistency with Regional Plans

Southern California Association of Governments (SCAG)

Regional Comprehensive Plan and Guide (RCPG). The RCPG was adopted in 1996 by the member agencies of SCAG to set broad goals for the Southern California region, with the exception of the County of San Diego, and to identify strategies for agencies at all levels of government to use in guiding their decision-making. The RCPG identifies significant issues and changes that can be anticipated by the year 2015 and beyond. Adopted policies related to land use are contained primarily in the Growth Management chapter of the RCPG. The primary goal of the Growth Management chapter is to address issues related to growth and land use by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources, and enhance the quality of life in the region. SCAG uses the criteria in CEQA Guidelines, Section 15206 to define what a regionally significant project is:

1. A proposed local general plan, element, or amendment thereof for which an EIR was prepared.

2. A proposed residential development of more than 500 dwelling units.

3. A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.

4. A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.

5. A proposed hotel/motel of more than 500 rooms.

6. A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.

7. A project that would result in the cancellation of a Williamson Act Contract for any parcel of 100 or more acres.

8. A project for which an EIR was prepared and which is located in and substantially impacting an area of critical environmental sensitivity. This includes the California Coastal Zone.

9. A project that would substantially affect sensitive wildlife habitats such as riparian lands, wetlands, bays, estuaries, marshes, and habitats for rare and endangered species.

10. A project that would interfere with the attainment of regional water quality standards as stated in the approved areawide wastewater management plan.

11. A project that would provide housing, jobs, or occupancy for 500 or more people within 10 miles of a nuclear power plant.

12. A project that has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located.

The Growth Management chapters overall goals are to:[98]

- re-invigorate the region's economy,
- avoid social and economic inequities and the geographical dislocation of communities, and
- maintain the region's quality of life.

While the Project is not of the scale to be considered regionally significant based on the criteria above, the Project will nevertheless be consistent with, or not interfere with implementation of, the goals of the Growth Management Chapter of the RCPG. The Project would include commercial uses to provide additional jobs, revenue, and economic activity in the area. The Project would not dislocate a community or increase social or economic inequalities. The

[98] SCAG, RCPG Growth Management Chapter, page 3-1: http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGGrowthManagementChapter.pdf.

Project would include residential and commercial uses near similar compatible uses, such as commercial uses in Los Angeles.

Regional Comprehensive Plan (RCP). SCAG's 2008 RCP is a guidance document that was developed in response to the Regional Council directive in the 2002 Strategic Plan to develop a holistic, strategic plan for defining and solving the region's inter-related housing, traffic, water, and air quality challenges. The RCP incorporates input from the RCP Task Force, SCAG's policy committees and subregions, local governments, and other key stakeholders. RCP defines a vision for the SCAG region that includes balancing resource conservation, economic vitality, and quality of life. It also provides a long-term planning framework that describes comprehensive responses to growth and infrastructure challenges and recommends an Action Plan targeted for the year 2035. The RCP does not mandate integrated resources planning; however, SCAG does request that local governments consider the recommendations set forth on the RCP in their General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions. The RCP is an advisory document that contains policies that apply to public and/or private sectors. Public sector includes SCAG, local and state governments, transportation commissions, and resource agencies and conservation groups. Many of the policies apply to SCAG and the public sector, and are intended to inform how SCAG and governments should work to integrate growth and land use planning. The RCP policies are organized in the following categories: Land Use and Housing, Open Space and Habitats, Water, Energy, Air Quality, Solid Waste, Transportation, Security and Emergency Preparedness, and Economy. **Table 3.10-1, SCAG Regional Comprehensive Plan**, lists the policies that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) policies of the Regional Comprehensive Plan.

Regional Transportation Plan (RTP). On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan (RTP). The Sustainable Communities Strategy (SCS) is a required element of the RTP. The RTP is a blueprint for making the best transportation and land use choices for the future and supporting those choices with wise investments. The RTP will result in more and better travel choices as well as safe, secure, and efficient transportation systems that provide improved access to opportunities, such as jobs, education, and healthcare for our residents. Furthermore, the RTP will create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for the region's 22 million residents by 2040. The RTP is built on the vision of mobility, economy, and sustainability.[99] The RTP contains goals and policies that are directed to transportation planners and decision-makers. They are not applicable to local and private projects, such as this Project. Nonetheless, they are provided below:

Goals

[99] SCAG, RTP: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx

- Align the plan investments and policies with improving regional economic development and competitiveness
- Maximize mobility and accessibility for all people and goods in the region
- Ensure travel safety and reliability for all people and goods in the region
- Preserve and ensure a sustainable regional transportation system
- Maximize the productivity of our transportation system
- Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)
- Actively encourage and create incentives for energy efficiency, where possible
- Encourage land use and growth patterns that facilitate transit and non-motorized transportation
- Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies

Policies

1. Transportation investments shall be based on SCAG's adopted regional Performance Indicators
2. Ensuring safety, adequate maintenance, and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region
3. RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives
4. Transportation demand management (TDM) and non-motorized transportation will be focus areas, subject to Policy 1
5. HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1
6. The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.
7. The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run

8. Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan

Applicability of SCAG Plans

The goals and policies of the RCPG, RCP, and RTP address projects considered to be regionally significant. To monitor regional development, CEQA requires regional agencies, such as SCAG, to review projects and plans throughout its jurisdiction. In the Southern California region, with exception of the County of San Diego, SCAG acts as the region's "Clearinghouse," and collects information on projects of varying size and scope to provide a central point to monitor regional activity.

The Project is not considered to be a regionally significant project pursuant to CEQA Guidelines 15206.[100] The threshold for a residential development is more than 500 dwelling units and for a commercial building is employing more than 1,000 persons or more than 250,000 square feet. The Project would not exceed those thresholds. As such, the Project will not be required to demonstrate consistency with SCAG policies contained in the RCPG, RCP, or RTP. Nonetheless, for purposes of disclosure, the consistency with regional plans is included.

South Coast Air Quality Management District (SCAQMD)

Air Quality Management Plan (AQMP). In the South Coast Air Basin, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2016 Air Quality Management Plan (AQMP).[101] The AQMP works with SCAG to forecast population growth for the region and develops a long-term attainment plan to accommodate the air pollution impacts of such growth. Because population growth drives the demand for jobs and housing that contribute to regional air pollution, projects that are consistent with regional population forecasts built into the AQMP are considered to have less-than-significant impacts on regional air quality. Consistency with jobs and housing projections are also considered as secondary barometers for growth.

The 2016 AQMP was adopted in March 2017 and continues the progression toward clean air and compliance with State and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources and area sources. The 2016 AQMP represents the most updated regional blueprint for achieving federal air quality standards and healthful air. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions, and presents a revised approach to demonstrated attainment of the 2006 24-hour $PM_{2.5}$ NAAQS for the Basin. Additionally, the 2016 AQMP relied upon a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact

[100] CEQA, Section 15206, Projects of Statewide, Regional, or Areawide Significance: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/Handout_CCR_15206_Statewide,Regional,Areawide_052007.pdf, January 4, 2017.

[101] SCAQMD, AQMP: http://www.aqmd.gov/aqmp/aqmpintro.htm.

of existing control measures to evaluate strategies for reducing NO_X emissions sufficiently to meet the upcoming ozone deadline standards.

The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management. As demonstrated in the following analyses, the Project would not result in significant regional emissions. Directly applicable to the Project, the 2016 AQMP proposes robust NO_X reductions from commercial cooking and residential and commercial appliances, as well as commercial space heating. The Project would be required to comply with all regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2016 AQMP. Therefore, the Project would result in less-than significant impacts related to consistency with the regional AQMP.

Los Angeles County Metropolitan Transportation Authority (Metro)

Congestion Management Plan (CMP) for Los Angeles County. The CMP for Los Angeles County 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 that are eligible to compete for state gas tax funds. Within Los Angeles County, Metro is the designated congestion management agency responsible for coordinating the CMP.

Based on the nominal level of net new project-related traffic, the Project will not produce significant impacts at any of the intersections or streets in the project vicinity.[102]

Consistency with City and Local Plans

City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals.[103] The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Plan for Healthy LA, Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Services Systems/Public Recreation Plan, Safety Element, and Mobility Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements. The General Plan

[102] Trip Generation Assessment, Hirsch/Green.
[103] California Government Code Section 65300.

Land Use Framework Element identifies the Project Site as Very Low Residential and the LAMC identifies the Project Site as zoned A2-1.

Single-Family Residential[104]

Note that the Very Low Residential land use designation corresponds to the General Plan's Single-Family Residential category, with corresponding zones of A2 (current) and RA (proposed).

The Framework Element recognizes the importance of existing single-family residential neighborhoods and the need to conserve them. Traditionally, they have formed the fabric that has distinguished the City from other urban areas. Even with substantial growth, the single-family dwelling is still considered to be a major objective of most income and ethnic groups. These areas also afford added opportunities to take advantage of the variety of lifestyles such as water-oriented, rural/agricultural and equestrian-keeping special use neighborhoods.

Table 3.10-2, General Plan Framework Land Use, lists the goals, objectives, and policies for land use that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) policies of the General Plan for each land use. The Project's residential, with residential uses nearby to the west and south, is consistent with the goals and objectives of the General Plan Framework. Therefore, no significant impacts due to consistency with land use designations in the General Plan Framework are anticipated.

Chatsworth-Porter Ranch Community Plan

The Project Site is located within the Chatsworth-Porter Ranch Community Plan (CPRCP), which was adopted in 1993.[105] The CPRCP is part of the Land Use Element of the City's General Plan. The Community Plan land use designation for the Site is Residential Single Family. The Community Plan also contains policies and objectives to guide development and uses planned within the City. Not every goal, policy, or objective is applicable to the Project or the Project Site. The Community Plan is intended to promote an arrangement of land use, circulation, and services that will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community within the larger framework of the City; guide the development, betterment, and change of the Community to meet existing and anticipated needs and conditions; balance growth and stability; reflect economic potentials and limits; land development and other trends; and protect investment to the extent reasonable and feasible.

The Community Plan is over 24 years old and many of its policies are out dated and not in keeping with the changes occurring in today's trends in the land use patterns and population growth of the CPRCP. Instead of creating an entirely new Community Plan, the City has initiated a series overlay districts, zoning modifications and policies to keep up with trends. As

[104] General Plan, Chapter 3-Land Use: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03203.htm
[105] Chatsworth-Porter Ranch Community Plan: http://cityplanning.lacity.org/complan/pdf/chtcptxt.pdf

an example, the –K (equine-keeping overlay) that has been applied to parcels in the area, including those directly south of the Site along Calle Milagros. The K overlay is intended to allow equine keeping in closer proximity to residential dwellings when applied. The applicant is applying the K overlay to the Project with the understanding that the City will initiate the overlay.

Table 3.10-3, Chatsworth-Porter Ranch Community Plan, sets forth the standards for residential land use and discusses the Project's consistency and applicability with each of them.

ZI-1732 Council Office Notification (Rock Out-Croppings). The zoning for the Project Site includes the notation ZI-1732 which refers to a City ordinance that requires the Council Office (currently Council District 12, Mitch Englander) to be notified of any applications filed for grading or soils reports on vacant lots, or plans for new buildings in the area.[106] The Site is near, but not within any rock outcroppings. The nearest rock cropping is across Topanga Canyon Boulevard, approximately 275 feet east of the Site. Views would not be impeded by the Project.

ZI-2438 Equine Keeping in the City of Los Angeles. The zoning for the Project Site includes the notation ZI-2438, which refers to a City ordinance that outlines the required building permit process and general development guidelines for development on equine keeping lots. No building permit shall be issued by LADBS for any building which creates new habitable space on a lot located in whole or in part within an Equine Keeping "K" District or lot zoned RA, RE20, RE40, A1, or A2 until the applicant completes and submits the "Equine Keeping Checklist Form" to LADBS prior to the issuance of the building permit. This form will be provided to the applicant by LADBS during the plan check process. LADBS shall not issue a building permit for a residential building or addition (excluding non-habitable rooms) that does not comply with the distance requirements, unless the Zoning Administrator makes an exception in accordance with LAMC Section 12.24X.5.[107].

ZI-2462 Modifications to SF Zones and SF Zones Hillside Area Regulations (on APN 2723-005-030). On March 17, 2017, pursuant to Ordinance No. 184,802, the provisions governing the development of single-family (RA, RE, RS, R1) zoned properties citywide were modified to establish new regulations regarding the size and bulk of new and enlarged homes, and to further regulate grading and earth import/export in designated Hillside Areas. The modified single-family zone regulations include changes to several definitions in LAMC Section 12.03, including the definition of "Floor Area, Residential." Other modifications pertain to Residential Floor Area bonus options, the allowable Residential Floor Area Ratio in the R1 Zone, other Area regulations in the R1 Zone, and grading and hauling regulations in designated Hillside Areas.[108] The Project intends to comply with this ZI.

City of Los Angeles Planning and Zoning Code

The Project site is designated on the official zoning maps of the City as A2-1.

[106] http://zimas.lacity.org/documents/zoneinfo/ZI1732.pdf
[107] http://zimas.lacity.org/documents/zoneinfo/ZI2438.pdf
[108] http://zimas.lacity.org/documents/zoneinfo/ZI2462.pdf

The Project seeks a Zone Change from A2-1 to RA-1-K, in order to permit the development of 20 residential horse-keeping lots. (It is anticipated that the North Valley Area Planning Commission or the City Council would initiate the Zone Change request to include the –K designation, but such request may also be filed by the Applicant.). The Project also seeks a Subdivision for 19 single family lots of 20,000 square feet (VTTM 074478). These requests are in order to have consistent zoning that allows the maximum land use of an underutilized site for a residential (with horse-keeping lots) project.

Findings: Zone Change, LAMC Section 12.32 F

The Project is beneficial in terms of Public Necessity, in that it creates desirable market-rate single-family residential homes on large lots varying from 20,000 square feet to over 50,000 square feet in area, which will accommodate equestrian uses in keeping with the equestrian environment of the surrounding neighborhood. There is a critical and well-documented demand for housing throughout the City and the proposed subdivision and development of 20 new single-family dwellings on lots of a comparable size to surrounding properties and which can accommodate horse keeping uses helps to satisfy the need for this type of housing in a location designated for such uses on the Community Plan. The project replaces several outdated buildings with significantly modern and more environmentally friendly homes, which meet "green building standards", include landscaping with drought tolerant plants utilizing a high-efficiency irrigation system, and minimize need for additional energy and water demand and is therefore in conformance with the public necessity.

The Project is located in one of the few remaining underdeveloped rural communities at the most northwest corner of the San Fernando Valley. It is very near Topanga Canyon Boulevard, a major highway, with direct access to the Simi Valley-San Fernando Valley (118) Freeway to the north and the Devonshire/Topanga Commercial Corridor to the south, which provides community serving retail, office and service businesses.

The Project’s proposed RA-1-K zoning conforms to the density and land use pattern established by the adopted Chatsworth-Porter Ranch Community Plan under the Very Low 1 Residential designation limiting density to one to two dwelling units per gross acre and providing large lots with 20,000 to more than 50,000 square feet of area. Previously approved subdivisions in the immediate vicinity are zoned (T)(Q)RA-1 and RA-1-K. The Project's zoning of RA-1 provides an appropriate transition between the existing RA-zoned properties and the remaining A2-1-zoned properties to the northwest and south.

All of the proposed lots will conform with the lot area, width, height, setback and frontage requirements of the RA-1 zone and will allow equestrian uses in conformance with the equestrian standards regarding minimum pad area for homes, horsekeeping areas, access to equestrian trails, vehicular access for maintenance of the equestrian pad area and the delivery of feed and removal of waste.

Conclusion

The requested discretionary actions do not conflict with urban land uses in the area and the Project would not introduce a new incompatible use. In fact the Project promotes many of the goals and polices of the CPRCP. The area supports residential uses. The proposed homes would be comparable with other structures in the area, and thus will not introduce an incompatible scenic element into the community. As such, impacts with respect to applicable land use plans, policies and zoning would be less than significant, and the development would be in compliance with this statement.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact.

A significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan. The Project Site is not located within the boundary of a habitat conservation plan or natural community conservation plan and therefore will not conflict with the provisions of Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. As such, no impact would occur.

Table 3.10-1

SCAG Regional Comprehensive Plan

Policies	Discussion
Land Use and Housing [1]	
LU-6.2 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Programs.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, through regulatory compliance measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Open Space and Habitat [2]	
OSN-14 Developers and local governments should implement mitigation for open space impacts through the following activities: • Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space. • Individual projects should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA's Critter Crossings, and Ventura County Mitigation Guidelines. • Project level mitigation for RTP's significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements. • Project sponsors should fully mitigate direct and indirect impacts to open space resulting from implementation of regionally significant projects.	**Consistent.** The Project would be an infill development that avoids significant impacts to regionally significant open space resources. The Project would be built on private land that is surrounded by other private residential developments. It includes mitigation measures to protect species that may be found on the Site and mitigation to comply with the replacement requirements for tree removal.
OSC-9 Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.	**Not Applicable.** OSC-9 does not apply to this Project as it is not directly adjacent to natural areas for outdoor recreation. The Site acts as transition between the parcels that are adjacent to natural areas (edge properties) and

Policies	Discussion
	the more developed parcels on Topanga. The Project would not impede access to natural lands. Stoney Point Park is accessed from Topanga Canyon, which would not be affected by the Project.
OSC-10 Developers and local governments should promote infill development and redevelopment to revitalize existing communities.	**Consistent.** The Project is an infill development in an existing community.
OSC-11 Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as air quality (pollution) and solid waste recycling and reduction regulatory compliance measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings. The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
OSC-12 Developers and local governments should promote water-efficient land use and development.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as water-efficient features, through regulatory compliance measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings. The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
OSC-13 Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	**Consistent.** The Project would contain residential uses in an area that is compatible for these uses.
Water [3]	
WA-9 Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.	**Consistent.** The Project includes conservation features to reduce operational water use, per LADWP and LAMC requirements.
WA-10 Developers and local governments should include conjunctive use as a water management strategy when feasible.	**Consistent.** Conjunctive use is the coordinated management of surface water and groundwater supplies to maximize the yield of the overall water resource. An active form of conjunctive use utilizes artificial recharge, where surface water is intentionally percolated or injected into aquifers for later use. The Project would not conflict or preclude the City from exploring conjunctive use as a water management strategy.
WA-11 Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	**Consistent**. The Project would confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. The Project shall implement any upgrade to the water infrastructure serving the Project Site that is needed to

Policies	Discussion
	accommodate the water consumption needs.
WA-12 Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	**Consistent.** The Project would include landscaping that is drought-tolerant and irrigated with water conservation techniques.
WA-13 Developers and local governments should protect and preserve vital land resources—wetlands, groundwater recharge areas, woodlands, riparian corridors, and production lands. The federal government's 'no net loss' wetlands policy should be applied to all of these land resources.	**Consistent.** The Project would not impact wetlands.
WA-27 Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and on-site mitigation.	**Consistent.** The Project will not result in a change in the drainage at the Project Site. The Site is relatively flat and would remain flat.
WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.	**Consistent.** The Project will comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project would also be consistent with the City of Los Angeles Green Building Code (LAGBC) for all new buildings. The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Energy [4]	
EN-8 Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips.	**Consistent.** The Project is a residential single family development in an area that contains large lots and equestrian keeping facilities and trails. This will encourage biking and walking trips.
EN-10 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include: • Using energy efficient materials in building design, construction, rehabilitation, and retrofit • Encouraging new development to exceed Title 24 energy efficiency requirements.	**Consistent.** The Project would be in compliance with the City's Green Building Ordinance, which requires green building and energy efficient practices.

Policies	Discussion
• Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. • Utilizing efficient commercial/residential space and water heaters: this could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits. • Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, which allow communities to generate their own electricity • Orienting streets and buildings for best solar access. • Encouraging buildings to obtain at least 20% of their electric load from renewable energy.	
EN-11 Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction should be completed according to the specifications of the energy provider.	**Consistent.** The LADWP does not provide consumption rates so the SCAQMD rates are used to calculate estimated electrical usage for the Utilities section of this analysis. Electrical service is available and will be provided in accordance with the LADWP's Rules Governing Water and Electric Service. Southern California Gas Company (SCG) would serve the Project's natural gas needs. In the event that SCG cannot provide service from the existing infrastructure, SCG will conduct system analysis and determine the best method to provide gas to the customer, when the total requested load for the Project is received.
EN-12 Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.	**Consistent.** This is an encouragement to incorporate solar panels, not a requirement.
EN-14 Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.	**Not Applicable.** The Project is a private residential development that has no control on commuting and work schedule choices.
Solid Waste [5]	
SW-14 Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and	**Consistent.** The Project would include a demolition and construction waste recycling program as required by LAMC. The Project will recycle demolition and construction materials including: solvents, water-based paints, vehicle

Policies	Discussion
Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include: • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.). • Reuse of existing building structure and shell in renovation projects. • Building lifetime waste reduction measures that should be explored for new and remodeled buildings include: • Development of indoor recycling program and space. • Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components.	fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. During operation, recycling bins shall be provided to promote recycling of paper, metal, glass, and other recyclable material.
SW-17 Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.	**Not Applicable.** The Project would not be a composting, or composting, recycling, or conversion technology facility.
SW-18 Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.	**Not Applicable.** The Project would not be a waste management facility.
SW-19 Developers and local governments should facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.	**Not Applicable.** The Project would not be an eco-industrial park.
SW-20 Developers and local governments should prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities near existing waste management or material recovery facilities.	**Not Applicable.** The Project would not be a solid waste management facility.
SCAG Regional Comprehensive Plan: http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf [1] Page 21; [2] Pages 34 and 39; [3] Pages 59-61; [4] Pages 75-76; [5] Pages 105-106 Table: CAJA Environmental Services, August 2017.	

Table 3.10-2
General Plan Framework Land Use

Goal, Objective, Policies	Discussion
Single Family Residential	
GOAL 3B Preservation of the City's stable single-family residential neighborhoods.	**Consistent.** The Project would include only single-family homes.
Objective 3.5 Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.	**Consistent.** The Project would include residential homes that are similar in scale and height as the existing homes on Calle Milagros near the Project.

Policy 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.** According to Table 3-1, the Single-Family Residential category has the following typical uses:
	• Single-family dwelling units
	• Supporting uses (parks, schools, community centers, etc.)
	• Infill development shall be designed and sited to maintain the salient characteristics of the neighborhood in which it is located (e.g., setbacks, building mass, rural, equestrian, etc.)
	• Incentives for upgrades of deteriorated and aging housing stock
	• 1 - 9 units per net acres. Specific densities are established by community plans using the following categories:
	  ○ Minimum-Density (in hillside areas the slope density provisions of the LAMC shall apply)
	  ○ Very Low I
	  ○ Very Low II
	  ○ Low I
	  ○ Low II
	  ○ Duplex/granny flat
	The Project includes uses permitted in the RA zone such as single-family homes. According to Table 3-2, the Very Low I land use designation corresponds to RA zone for the Project Site. Density would be 2 units per acre.

Policy 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 homes would be built to maintain the setback and scale of the area, which includes larger lots.
Policy 3.5.3 Promote the maintenance of existing single-family neighborhoods and support programs for the renovation and rehabilitation of deteriorated and aging housing units.	**Consistent.** The Project maintains the Site as a place for single-family homes. Part of the Project would rehabilitate the aging Wilson Home.
Policy 3.5.4 Require new development in special use neighborhoods such as water-oriented, rural/agricultural and equestrian communities to maintain their predominant and distinguishing characteristics.	**Consistent.** The Project is within an area that supports horse-keeping lots. The Project would include horse paddocks for each lot.

Goal, Objective, Policies	Discussion
Policy 3.5.5 Promote the maintenance and support of special use neighborhoods to encourage a wide variety of these and unique assets within the City.	**Consistent.** The Project is within an area that supports horse-keeping lots. The Project would include horse paddocks for each lot.
Objective 3.6 Allow for the intensification of selected single-family areas that directly abut high-density development as "transitions" between these uses.	**Consistent.** More dense residential neighborhoods are located several blocks south, along Chatsworth Street. The Site provides a transition between the different densities in the area, with a gradual transition from less dense (along Farralone) to more dense (along Chatsworth).
Policy 3.6.1 Ensure that the new development of "duplex" or multi-family units maintains the visual and physical character of adjacent single-family neighborhoods, including the maintenance of front property setbacks, modulation of building volumes and articulation of facade to convey the sense of individual units, and use of building materials that characterize single-family housing.	**Not Applicable.** The Project does not include duplex or multi-family units.
General Plan, Chapter 3-Land Use, Single-Family Residential: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03201.htm Table: CAJA Environmental Services, August 2017.	

Table 3.10-3
Chatsworth-Porter Ranch Community Plan

Standards and Criteria	Discussion
Housing	
1. The adequacy of the existing and potential street circulation system, both within the area and in the peripheral areas;	**Consistent**. The Project includes new private streets to provide access from the public street (Santa Susana) to the interior of the Site.
2. The availability of sewer, drainage facilities, fire protection services and facilities, and other public utilities;	**Consistent**. The Project would ensure that the lots are adequately connected to sewer and drainage facilities and that fire protection and other public services and utilities can serve the Site. Lot 19 is expected to have a private onsite wastewater system that complies with the requirements of LA Sanitation and LADBS.
3. The steepness of the topography of the various parts of the area and the suitability of the geology of the area for development shall be guided by the following: In areas designated for Minimum density housing, the dwelling unit density shall not exceed that allowed by the slope density ordinance (LAMC Section 17.05 C). Hillside areas designated Very Low I or Very Low II on the Plan Map which contain limited areas of exceptionally steep topography should be restricted to even lower densities. It is the policy of the Planning Commission that the Deputy Advisory Agency must consider lower densities, including Minimum density, when considering applications for development of such areas. Factors to be considered should include, but not be limited to steepness of slope, amount of grading, soil stability, erosion, land division patterns, vehicular access, etc.	**Consistent**. The Project would have density consistent with the requirements of Very Low Residential I planning designation. The Site is relatively flat and although the western portion is designated hillside area, the topography would not affect development.
4. The compatibility of proposed developments with the existing adjacent developments.	**Consistent**. The Project includes single-family homes that would be similar in scale and height as existing homes on Calle Milagros.
Source: Chatsworth-Porter Ranch Community Plan: http://cityplanning.lacity.org/complan/pdf/chtcptxt.pdf Table: CAJA Environmental Services, August 2017.	

11. MINERAL RESOURCES

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact.

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 a project would convert an existing or future regionally-important mineral extraction use to another use, or if a project would affect access to a site used or potentially available for regionally-important mineral resource extraction. Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits, which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 zone in Los Angeles was developed with structures prior to the MRZ-2 classification and is unavailable for extraction.[109] MRZ-2 sites are identified in two community plan elements of the city's general plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.[110] Neither the Project Site nor the surrounding area is in an MRZ-2 zone, nor identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Site is not zoned within an Oil Drilling District (-O). Often, the –O districts identified has been developed with structures and is inaccessible for mining extraction.[111] The Project Site is not located within any Major Oil Drilling Areas, which are 25 city designated major oil drilling areas. The nearest is #6, Horse Meadows, located near Tampa and Rinaldi.[112] The California Department of Conservation has more detailed online mapping of wells. No oil wells exist on the Project Site.[113] Therefore, no impacts to mineral resources of regional or statewide significance would occur.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact.

A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource and the project converted an existing or potential future

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109 City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58: http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed August 24, 2017.

110 City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-59: http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed August 24, 2017.

111 City of Los Angeles, Conservation Element of the General Plan, September 16, 2001; pg II-57.

112 City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed August 24, 2017.

113 California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 2, website: http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx, August 24, 2017.

locally-important mineral extraction use to another use or if the project affected access to a site in use or potentially available for locally-important mineral resource extraction. The Project Site is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 11(a) above, no oil wells exist on the Project Site.

Furthermore, the Site is surrounded by suburban uses and sensitive residential receptors. Thus, the Site would not be an adequate candidate for mineral extraction. Therefore, no impacts to loss of availability of a locally important mineral resource would occur.

12. NOISE

The section is based, in part, on the following item, included as Appendix H of this IS/MND:

H Noise and Vibration Impact Study, LSA, April 2018.

a) Would the project result in 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?

Less Than Significant Impact with Mitigation.

Characteristics of Sound

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep. To the human ear, sound has two significant characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations, or cycles per second, of a wave resulting in the tone's range from high to low. Loudness is the strength of a sound that describes a noisy or quiet environment and is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity refers to how hard the sound wave strikes an object, which in turn produces the sound's effect. This characteristic of sound can be precisely measured with instruments. The analysis of a project defines the noise environment of the project area in terms of sound intensity and its effect on adjacent sensitive land uses.

Measurement of Sound

Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies. Unlike linear units (e.g., inches or pounds), decibels are measured on a logarithmic scale representing points on a sharply rising curve. For example, 10 decibels (dB) are 10 times more intense than 1 dB, 20 dB are 100 times more intense, and 30 dB are 1,000 times more intense. Thirty (30) dB represent 1,000 times as much acoustic energy as 1 dB. The decibel scale increases as the square of the change, representing the sound pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as only a doubling of the loudness of the sound. Ambient sounds generally range from 30 dB (very quiet) to 100 dB (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. For a single point source, sound levels decrease approximately 6 dB for each doubling of

distance from the source. This drop-off rate is appropriate for noise generated by stationary equipment. If noise is produced by a line source (e.g., highway traffic or railroad operations), the sound decreases 3 dB for each doubling of distance in a hard-site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases 4.5 dB for each doubling of distance. There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. Equivalent continuous sound level (Leq) is the total sound energy of time varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the Leq and community noise equivalent level (CNEL) or the day-night average level (Ldn) based on A-weighted decibels (dBA). CNEL is the time varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly Leq for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). Ldn is similar to the CNEL scale but without the adjustment for events occurring during the evening hours. CNEL and Ldn are within 1 dBA of each other and are normally exchangeable. The City uses the CNEL noise scale for long-term noise impact assessment.

Other noise rating scales of importance when assessing the annoyance factor include the maximum noise level (Lmax), which is the highest exponential time averaged sound level that occurs during a stated time period. The noise environments discussed in this analysis for short-term noise impacts are specified in terms of maximum levels denoted by Lmax. Lmax reflects peak operating conditions and addresses the annoying aspects of intermittent noise. Lmax is often used together with another noise scale, or noise standards in terms of percentile noise levels, in noise ordinances for enforcement purposes. For example, the L10 noise level represents the noise level exceeded 10 percent of the time during a stated period. The L50 noise level represents the median noise level. Half the time the noise level exceeds this level, and half the time it is less than this level. The L90 noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period. For a relatively constant noise source, the Leq and L50 are approximately the same. Noise impacts can be described in three categories. The first is audible impacts that refer to increases in noise levels noticeable to humans. Audible increases in noise levels generally refer to a change of 3 dB or greater because this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, refers to a change in the noise level between 1 dB and 3 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category is changes in noise levels of less than 1 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant.

Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects the entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, thereby affecting blood pressure and functions of the heart and the nervous system. In comparison, extended periods of noise exposure above 90 dBA would result in permanent cell damage. When the noise level reaches 120 dBA, a tickling

sensation occurs in the human ear even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. A sound level of 160 to 165 dBA will result in dizziness or loss of equilibrium. The ambient or background noise problem is widespread and generally more concentrated in urban areas than in outlying less developed areas. **Table 3.12-1** lists definitions of acoustical terms, and **Table 3.12-2** shows common sound levels and their noise sources. **Table 3.12-3** shows the City's land use noise compatibility from the City's Noise Element of the General Plan.

Table 3.12-1
Definition of Acoustical Terms

Terms	
Decibel, dB	A unit of level that denotes the ratio between two quantities that are proportional to power; the number of decibels is 10 times the logarithm (to the base 10) of this ratio.
Frequency, Hz	Of a function periodic in time, the number of times that the quantity repeats itself in 1 second (i.e., number of cycles per second).
A-Weighted Sound Level, dBA	The sound level obtained by use of the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. All sound levels in this report are A-weighted, unless reported otherwise.
L01, L10, L50, L90	The fast-response, A-weighted noise levels that are equaled or exceeded by a fluctuating sound level for n-percent of a stated time period. For example, 1 percent, 10 percent, 50 percent, and 90 percent of the stated period. The L10 level is commonly called the 'intrusive sound level' and is near the maximum level in that time period, while the L90 is commonly called the 'residual sound level' and is near the minimum level in that period.
Equivalent Continuous Noise Level, Leq	The level of a steady sound that, in a stated time period and at a stated location, has the same A-weighted sound energy as the time-varying sound.
Community Noise Equivalent Level, CNEL	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 5 dBA to sound levels occurring in the evening from 7:00 p.m. to 10:00 p.m. and after the addition of 10 dBA to sound levels occurring in the nighttime between 10:00 p.m. and the following 7:00 a.m.
Day/Night Noise, Level, Ldn	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 dBA to sound levels occurring in the nighttime between 10:00 p.m. and 7:00 a.m.
Lmax , Lmin	The maximum and minimum A-weighted sound levels measured on a sound level meter, during a designated time interval, using fast-response time averaging. The Lmax is equal to the L0 and the Lmin is equal to the L100 .
Ambient Noise Level	The all-encompassing noise associated with a given environment at a specified time. It is usually a composite of sounds from many sources and from many directions, both near and far, with no particular sound source being dominant.
Intrusive	The noise that intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, time of occurrence, and tonal or informational content, as well as the increment above the ambient noise level.
Source: Handbook of Acoustical Measurements and Noise Control (Harris 1991).	

Table 3.12-2
Common Sound Levels and Their Noise Sources

Noise Source	A-Weighted Sound Level in Decibels	Noise Environments	Subjective Evaluations
Near Jet Engine	140	Deafening	128 times as loud
Civil Defense Siren	130	Threshold of Pain	64 times as loud
Hard Rock Band	120	Threshold of Feeling	32 times as loud
Accelerating Motorcycle at a Few Feet Away	110	Very Loud	16 times as loud
Pile Driver; Noisy Urban Street/Heavy City Traffic	100	Very Loud	8 times as loud
Ambulance Siren; Food Blender	95	Very Loud	
Garbage Disposal	90	Very Loud	4 times as loud
Freight Cars; Living Room Music	85	Loud	
Pneumatic Drill; Vacuum Cleaner	80	Loud	2 times as loud
Busy Restaurant	75	Moderately Loud	
Near Freeway Auto Traffic	70	Moderately Loud	
Average Office	60	Quiet	One-half as loud
Suburban Street	55	Quiet	
Light Traffic; Soft Radio Music in Apartment	50	Quiet	One-quarter as loud
Large Transformer	45	Quiet	
Average Residence without Stereo Playing	40	Faint	One-eighth as loud
Soft Whisper	30	Faint	
Rustling Leaves	20	Very Faint	
Human Breathing	10	Very Faint	Threshold of Hearing
Source: Compiled by LSA. (2018).			

Table 3.12-3
Land Use Noise Compatibility

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditorium, Concert Hall, Ampitheater	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

A = Normally acceptable. Specified land use is satisfactory, based upon assumption buildings involved are conventional construction, without any special noise insulation.

C = Conditionally acceptable. New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.

N = Normally unacceptable. New construction or development generally should be discouraged. A detailed analysis of noise reduction requirements must be made and noise insulation features included in the design of a project.

U = Clearly unacceptable. New construction or development generally should not be undertaken.

Existing Conditions

Land uses located within the Project Site include residences and a health service/rehabilitation facility (United Cerebral Palsy). Single-family residences are located to the west and south of the Project Site. The health service/rehabilitation facility is located north of the Project Site.

Transportation facilities make up the primary existing noise sources in the project area. Traffic on Topanga Canyon Boulevard, Santa Susana Avenue, and other local streets is the primary source of noise in the project vicinity. Other noise sources include train noise.

Ambient Noise Survey

An ambient noise survey was conducted in the project vicinity near the adjacent noise-sensitive receiver locations. A short-term 20-minute noise measurement was conducted at two representative sites, one on the east side along Old Santa Susana Pass Road and the other on the west side of the Project Site. **Table 3.12-4** lists the noise monitoring results.

Short-term noise measurements in the project vicinity ranged from 56.6 to 63.5 dBA L_{eq}, with the maximum noise levels ranging from 65.4 to 71.3 dBA L_{max}. These noise levels are both higher than the City's presumed ambient noise level of 50 dBA $L_{eq,}$ and at times are higher than the 75 dBA L_{max} maximum noise level.

Table 3.12-5 describes the physical location of the noise measurement locations. Ambient noise sources in the project area include mostly vehicular traffic. Ambient noise levels measured over a short period of time (Leq) represent a snapshot in time of the noise environment, and should not be confused with the 24-hour weighted average noise level of the CNEL.

Table 3.12-4
Short-Term Ambient Noise Monitoring Results

Monitor No.	Date	Start Time	Duration	dBA Leq	dBA Lmax
ST-1	August 3, 2016	10:50 AM	20 minutes	63.5	71.3
ST-2	August 3, 2016	11:20 PM	20 minutes	56.6	65.4

Source: Compiled by LSA. (2018).
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
Leq = equivalent continuous noise level
Lmax = maximum instantaneous noise level
N/A = not applicable
ST = short-term

Table 3.12-5
Physical Location of Noise Level Measurements

Monitor No.	Location Description	Noise Sources
ST-1	Along Old Santa Susana Pass Road. The meter was placed 10 ft west of the curb.	Traffic on Santa Susana Avenue and Topanga Canyon Boulevard.
ST-2	On the west side of project site, approximately 300 ft from Old Santa Susana Pass Road.	Traffic on Topanga Canyon Boulevard and Santa Susana Avenue.

Source: Compiled by LSA Associates, Inc. (2018).
ft = foot/feet
ST = short-term

Train Noise

The Union Pacific Railroad (UPRR) tracks, which also carry Amtrak and Metrolink trains, are 600 ft north of the Project Site. The train crossing data from the Federal Railroad Administration Office of Safety Analysis show that there are a total of 22 freight trains per day. Also, there are a

total of five Amtrak trains and 11 Metrolink trains per day based on the Amtrak and Metrolink schedules, respectively, posted on their websites. The FTA's 2006 Transit Noise and Vibration Impact Assessment manual was used to evaluate train related noise impacts. These trains would operate 7 days per week, 24 hours per day. Similar to vehicular traffic on roadways, train noise is also a line source that would be assumed to have the train along the centerline of the train tracks so that it covers both directions and balances the train noise emissions. Train noise projected from the edge of the train tracks would be the same as train noise projected from the centerline of the train tracks, with a slight modification to the calculation process for the noise source and distance attenuation. Using the FTA's guidelines, it is calculated that train operations in the study area would result in a noise level of 67.9 dBA CNEL at 50 ft from the train tracks. The Project Site is 600 ft from the track centerline. Train noise is a line source with 4.5 dBA reduction per doubling of distance (noise reduction from a line source is based on 15Log (D_2/D_1), where D_1 in this case is 50 ft and D_2 is the distance from the line source to the location of concern). At this distance, train noise would be reduced to 51.7 dBA CNEL at the northern project boundary. Multiple intervening structures and terrain changes from rail line to the Project Site would provide a noise reduction of 5 dBA. Therefore, noise levels generated from train operations would be 46.7 dBA CNEL.

Traffic Noise

The Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (1977; FHWA RD-77-108) was used to evaluate traffic-related noise conditions along roadway segments in the project vicinity. This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over 24 hour periods to determine the CNEL values. The standard vehicle mix for Southern California roadways was used for traffic on this roadway segment. A project specific traffic analysis has not been prepared. Therefore, the potential noise impacts were calculated using the City's database for traffic volumes along Topanga Canyon Boulevard near Santa Susana Avenue in 2015. An average daily traffic (ADT) volume of 49,100 was calculated for Topanga Canyon Boulevard in the project area in 2016. The traffic noise levels were modeled using vehicle speeds of 45 miles per hour (mph) along Topanga Canyon Boulevard in the project area. **Table 3.12-6** provides the traffic noise levels for the existing conditions. These noise levels represent the worst-case scenario, which assumes that no shielding will be provided between the traffic and the location where the noise contours are drawn.

The table shows that traffic noise levels along Topanga Canyon Boulevard are moderately high. The table shows that the 70, 65, and 60 dBA CNEL impact zones extend 101, 215, and 462 ft, respectively, from the roadway centerline.

Table 3.12-6
Existing (2016) Traffic Noise Levels

Roadway Segment	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane
Topanga Canyon Boulevard at Santa Susana Avenue	49,100	101	215	462	72.7

Source: Compiled by LSA (2018).
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
ft = feet

Regulatory Requirements

Thresholds of Significance

A project will normally have a significant effect on the environment related to noise if it will substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of the community in which it is located. The applicable noise standards governing the project site are the criteria in the City's Noise Element of the General Plan.

Los Angeles General Plan Noise Element. The Noise Element of the City General Plan is intended to identify sources of noise and provide objectives and policies that ensure that noise from various sources does not create an unacceptable noise environment. Overall, the City's Noise Element describes the noise environment (including noise sources) in the City; addresses noise mitigation regulations, strategies, and programs; and delineates federal, State, and City jurisdiction relative to rail, automotive, aircraft, and nuisance noise. The City's noise standards are correlated with land use zoning classifications in order to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds the ambient noise levels within a specified zone. The City has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the State Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the City's General Plan Noise Element and the City's Los Angeles CEQA Thresholds Guide (2006) in terms of the CNEL. In accordance with the Noise Element of the City's General Plan, a noise exposure of up to 60 dBA CNEL is considered the most desirable target for the exterior of noise-sensitive land uses, or sensitive receptors (e.g., homes, schools, churches, and libraries). It is also recognized that such a level may not always be possible in areas of substantial traffic noise intrusion. Exposures up to 70 dBA CNEL for noise-sensitive uses are considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dBA CNEL are normally unacceptable for sensitive receptors except in unusual circumstances. A CNEL value of 70 dBA is the upper limit of the normally acceptable noise environment for business and professional commercial uses, and a

CNEL as high as 77 dBA is considered conditionally acceptable for business and professional commercial uses.

Los Angeles Municipal Code (LAMC). The City's comprehensive noise ordinance, found in Chapter XI of the LAMC, sets forth sound measurement and criteria, minimum 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, and legal remedies for violations. Specific key provisions of Chapter XI of the LAMC are discussed below. Section 112.05 of the LAMC prohibits the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 ft from the source of the noise between the hours of 7:00 a.m. and 10:00 p.m. when the source is located within 500 ft of a residential zone:

75 dBA for construction, industrial, and agricultural machinery, including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors, and pneumatic or other powered equipment;

75 dBA for powered equipment of 20 horsepower or less intended for infrequent use in residential areas, including chainsaws, log chippers, and powered hand tools; or

65 dBA for powered equipment intended for repetitive use in residential areas, including lawnmowers, backpack blowers, small lawn and garden tools, and riding tractors.

However, the noise limitations would not apply where compliance is deemed technically infeasible, which means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment. The aforementioned limitations apply only to uses in residential zones or within 500 ft thereof.

In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to (1) radios, television sets, and similar devices as defined in LAMC Section 112.01; (2) air-conditioning, refrigeration, heating, pumping, and filtering equipment as defined in LAMC Section 112.02; (3) powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices as defined in LAMC Section 112.04; and (4) motor vehicles driven on site as defined in LAMC Section 114.02. These standards apply regardless of the offsite land use. For the purposes of determining whether a violation of the noise regulations is occurring, the sound level measurements of an offending noise that has a duration of 5 minutes or less during a 1-hour period is reduced by 5 dBA to account for people's increased tolerance for short-duration noise events.

The ambient noise, as defined by the LAMC, is the measured noise level averaged over a period of at least 15 minutes (Leq). For the purposes of determining whether violation of the noise regulations is occurring, the sound level measurements of an offending noise are averaged over a minimum duration of 15 minutes and compared with the baseline ambient

noise level. The baseline ambient noise level is the actual measured ambient noise level (without the offending noise source) or the City's presumed ambient noise level (**Table 3.12-7**), whichever is greater. In cases where the actual measured ambient noise level is not known, the City's presumed ambient noise level will be used as the baseline. As indicated in **Table 3.12-7**, the City's presumed daytime (1:00 a.m. to 10:00 p.m.) ambient equivalent noise level (Leq) for residential and hotel uses is 50 dBA, while the nighttime (10:00 p.m. to 7:00 a.m.) presumed ambient noise level is 40 dBA.

The presumed daytime ambient noise level for commercial uses is 60 dBA, while the nighttime presumed ambient noise level is 55 dBA for commercial uses. In addition, Section 41.40 of the LAMC prohibits construction activity (including demolition) and repair work where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling, hotel, apartment, or other place of residence 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, unless the Board of Police Commissioners has authorized such use. All such activities are also prohibited on Sundays and all federal holidays.

Table 3.12-7
City of Los Angeles Presumed Ambient Noise Levels

Zone	Presumed Ambient Noise Level (dBA)	
	Day	Night
Residential, School, Hospital, Hotel	50	40
Commercial	60	55
Manufacturing (M1, MR1, and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

Source: City of Los Angeles Municipal Code, Section 111.03, Table II (2013).
Note: In this chart, daytime levels are to be used from 7:00 a.m. to 10:00 p.m. and nighttime levels from 10:00 p.m. to 7:00 a.m.
dBA = A-weighted decibel(s)
Leq = equivalent continuous sound level

Short-Term Construction-Related Impacts

Short-term noise impacts would be associated with excavation, grading, paving, and interior improvements inside the building during project construction. Construction-related short-term noise levels would be higher than existing ambient noise levels in the project area today but would no longer occur once conversion of the project is completed.

Two types of short-term noise impacts could occur during project construction. First, construction crew commutes and the transport of construction equipment and materials to the Project Site would incrementally increase noise levels on access roads leading to the site. Although there would be a relatively high single-event noise exposure potential at a maximum level of 84 dBA L_{max} from trucks passing at 50 ft, the effect on longer-term (hourly or daily) ambient noise levels would be less than 3 dBA. Therefore, short-term construction-related

impacts associated with worker commute and equipment transport to the Project Site would be less than significant.

The second type of short-term noise impact is related to noise generated during excavation, grading, and building erection on the Project Site. Construction is completed in discrete steps, each of which has its own mix of equipment, and consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. **Table 3.12-8** lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 ft between the equipment and a noise receptor, taken from the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) (FHWA 2006).

Typical noise levels range up to 88 dBA L_{max} at 50 ft during the noisiest construction phases. The site preparation phase, which includes excavation and grading of the site, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery (e.g., backfillers, bulldozers, draglines, and front loaders). Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

Project construction is expected to require the use of earthmovers, bulldozers, and water trucks/ pickup trucks. This equipment would be used on the Project Site. Based on the information in **Table 3.12-8**, the maximum noise level generated by each scraper on the Project Site is assumed to be 85 dBA L_{max} at 50 ft from the scraper. Each bulldozer would also generate 85 dBA L_{max} at 50 ft. The maximum noise level generated by water trucks/pickup trucks is approximately 55 dBA L_{max} at 50 ft from these vehicles. Each doubling of the sound sources with equal strength increases the noise level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, the worst-case combined noise level during this phase of construction would be 88 dBA L_{max} at a distance of 50 ft from the active construction area. Based on a usage factor of 40 percent, the worst-case combined noise level during this phase of construction would be 84 dBA L_{eq} at a distance of 50 ft from the active construction area.

Table 3.12-8
RCNM Default Noise Emissions Reference Levels and Usage Factors

Equipment Description	Impact Device?	Acoustical Usage Factor	Spec. 721.560 L_{max} at 50 ft (dBA, slow)	Actual Measured L_{max} at 50 ft (dBA, slow)	No. of Actual Data Samples (Count)
All other Equipment > 5 HP	No	50	85	N/A	0
Auger Drill Rig	No	20	85	84	36
Backhoe	No	40	80	78	372
Bar Bender	No	20	80	N/A	0
Blasting	Yes	N/A	94	N/A	0
Boring Jack Power Unit	No	50	80	83	1
Chainsaw	No	20	85	84	46
Clam Shovel (dropping)	Yes	20	93	87	4
Compactor (ground)	No	20	80	83	57
Compressor (air)	No	40	80	78	18
Concrete Batch Plant	No	15	83	N/A	0
Concrete Mixer Truck	No	40	85	79	40
Concrete Pump Truck	No	20	82	81	30
Concrete Saw	No	20	90	90	55
Crane	No	16	85	81	405
Dozer	No	40	85	82	55
Drill Rig Truck	No	20	84	79	22
Drum Mixer	No	50	80	80	1
Dump Truck	No	40	84	76	31
Excavator	No	40	85	81	170
Flatbed Truck	No	40	84	74	4
Front End Loader	No	40	80	79	96
Generator	No	50	82	81	19
Generator (< 25 kVA, VMS Signs)	No	50	70	73	74
Gradall	No	40	85	83	70
Grader	No	40	85	N/A	0
Grapple (on backhoe)	No	40	85	87	1
Horizontal Boring Hydraulic Jack	No	25	80	82	6
Hydra Break Ram	Yes	10	90	N/A	0
Impact Pile Driver	Yes	20	95	101	11
Jackhammer	Yes	20	85	89	133
Man Lift	No	20	85	75	23
Mounted Impact Hammer (hoe ram)	Yes	20	90	90	212
Pavement Scarifier	No	20	85	90	2
Paver	No	50	85	77	9
Pickup Truck	No	40	55	75	1
Pneumatic Tools	No	50	85	85	90
Pumps	No	50	77	81	17
Refrigerator Unit	No	100	82	73	3
Rivit Buster/Chipping Gun	Yes	20	85	79	19
Rock Drill	No	20	85	81	3
Roller	No	20	85	80	16
Sand Blasting (single nozzle)	No	20	85	96	9
Scraper	No	40	85	84	12
Sheers (on backhoe)	No	40	85	96	5
Slurry Plant	No	100	78	78	1
Slurry Trenching Machine	No	50	82	80	75
Soil Mix Drill Rig	No	50	80	N/A	0
Tractor	No	40	84	N/A	0
Vacuum Excavator (Vac-Truck)	No	40	85	85	149
Vacuum Street Sweeper	No	10	80	82	19

Equipment Description	Impact Device?	Acoustical Usage Factor	Spec. 721.560 L_{max} at 50 ft (dBA, slow)	Actual Measured L_{max} at 50 ft (dBA, slow)	No. of Actual Data Samples (Count)
Ventilation Fan	No	100	85	79	13
Vibrating Hopper	No	50	85	87	1
Vibratory Concrete Mixer	No	20	80	80	1
Vibratory Pile Driver	No	20	95	101	44
Warning Horn	No	5	85	83	12
Welder/Torch	No	40	73	74	5

Source: Table 9.1. *FHWA Highway Construction Noise Handbook* (FHWA 2006).
dBA = A-weighted decibels
FHWA = Federal Highway Administration
ft = foot/feet
HP = horsepower
kVA = kilovolt-amperes
L_{max} = maximum instantaneous noise level
N/A = not applicable
RCNM = Roadway Construction Noise Model
VMS = variable message sign

Construction noise levels would exceed the City's construction noise level standard of 75 dBA L_{max} at a distance of 50 ft because construction activities would occur between 7:00 a.m. and 10:00 p.m. within 500 ft of a residential zone. The implementation of **Mitigation Measures MM-Noise-1** through **MM-Noise-5** listed below would be required to reduce potential construction noise impacts to less than significant.

Mitigation Measures

MM-Noise-1 The construction contractor shall conduct construction activities outside of the prohibited hours of construction specified in Section 41.40 of the Los Angeles Municipal Code, which prohibits construction activity (including demolition) and repair work where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling, hotel, apartment, or other place of residence 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, unless the Board of Police Commissioners has authorized such use. All such activities are also prohibited on Sundays and all federal holidays.

MM-Noise-2 A minimum temporary construction barrier height of 14-foot (ft) high perimeter wall shall be placed along the northern, southern, and western construction boundary such that the line-of-sight from ground-level construction equipment and sensitive receptors would be blocked and to achieve a sound level reduction of at least 13 dBA. The construction barrier may be any material that has a minimum Sound Transmission Class (STC) rating of 28. All noise barrier material types are acoustically effective if they meet this minimum STC rating. This barrier could include heavy-duty materials such as vinyl-coated polyester (VCP).

MM-Noise-3 During all project site excavation and grading, the project contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.

MM-Noise-4 The project contractor shall place all stationary construction equipment so that emitted noise is directed away from the most sensitive receptors nearest the project site whenever feasible.

MM-Noise-5 The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and most noise-sensitive receptors nearest the project site during all project construction whenever feasible.

Impacts after Mitigation

A minimum temporary construction barrier height of 14 ft located along the northern, southern, and western construction boundary where off-site residential land uses are located would reduce noise levels by up to 13 dBA and construction noise levels would be reduced to 75 dBA L_{max} (88 dBA – 13 dBA = 75 dBA) and 71 dBA L_{eq} (84 dBA – 13 dBA = 71 dBA) at a distance of 50 ft.[114] Therefore, the implementation of **Mitigation Measures MM-Noise-1** through **MM-Noise-5** would reduce construction noise impacts to less than significant.

Potential Noise Impacts on the Project

Delivery trucks/truck loading and unloading activities and parking lot activities are off-site stationary noise sources that would potentially impact the project. The following provides a detailed noise analysis and discussion of each off-site stationary noise source.

Truck Delivery and Loading/Unloading Activities. Truck delivery and truck loading and unloading activities would occur at a property used to sell firewood (California Firewood Sales) located southeast of the Project Site across Topanga Canyon Road. This property is immediately south of the Chatsworth United Methodist Church. The delivery and unloading of firewood would occur at this location. Truck arrival and departure from the property selling firewood would take, at most, 5 minutes while noise generated from the truck unloading would be a few minutes even though the entire process takes an average of 15 to 20 minutes. Noise levels generated from truck movement would result in a maximum noise level similar to noise readings from loading and unloading activities for other commercial use projects, which generate a noise level of 75 dBA L_{max} at 50 ft based on measurements previously conducted by LSA.

The project is approximately 800 ft from truck delivery and truck unloading activities. The distance of 800 ft would provide a noise reduction of 12 dBA compared to the noise levels measured at 50 ft from the noise source. The project would construct a 6 ft high property wall to surround the outdoor living area (backyard) of the single-family residences, and the property wall would provide a minimum noise attenuation of 5 dBA for noise coming from the east. Noise levels generated from truck delivery and truck loading/unloading activities would be reduced to 58 dBA L_{max} (75 dBA – 12 dBA – 5 dBA = 58 dBA) or lower at the closest outdoor living area (i.e., backyards) on the Project Site. In addition, traffic noise associated with Topanga Canyon Boulevard would mask most of the loading/unloading noise in this area. This noise level would

[114] Analysis assumed a receptor height of 5 feet, a source height of 6 feet, a barrier height of 14 feet, a source-to-barrier distance of 15 feet, a receptor-to-barrier distance of 35 feet for a total receptor-to-source distance of 50 feet.

not exceed the City's maximum exterior noise standard of 75 dBA L_{max}. In addition, the ambient noise levels measured in this area was 63.5 dBA L_{eq} and existing traffic noise levels based on Table J would be 64 dBA CNEL. Therefore, no noise impacts would occur from truck delivery and truck loading and unloading activities because noise levels generated from truck delivery and truck loading and unloading activities would be masked by traffic noise on Topanga Canyon Boulevard. No mitigation is required.

Parking Lot Activity. Parking activities from the surface parking lot associated with the health service/rehabilitation facility (United Cerebral Palsy) is north of the Project Site. Noise generated from parking activities include vehicles traveling at slow speeds, engine start-up noise, car door slams, car horns, car alarms, and tire squeals. Representative parking activities would generate approximately 60 to 70 dBA L_{max} at 50 ft. Noise level generated from parking activities are intermittent in nature.

The project is approximately 10 ft from the surface parking lot north of the Project Site. At a distance of 10 ft, noise levels generated from these activities would reach 77 dBA L_{max}. The project would construct a 6 ft high property wall to shield the outdoor living area (backyard) of the single-family residences and the property wall would provide a minimum noise attenuation of 5 dBA. Noise levels generated from the parking activities would reach up to 65 dBA L_{max} (77 dBA – 5 dBA = 72 dBA). Intermittent noise levels generated from parking lot activities would not exceed the City's maximum exterior noise standard of 75 dBA L_{max}. Therefore, no noise impacts would occur from off-site parking lot activities. No mitigation is required.

Long-Term Stationary Noise Impacts

The Project would not expose adjacent residences to its stationary-source noise.

During Project operations, the development would produce noise from both on- and off-site sources. The direct on-site sources would include the following:

Mechanical Equipment. Regulatory compliance with LAMC Sec.112.02 would ultimately ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation, high ambient noise in the Project's vicinity, distances to receptors, the relatively quiet operation of modern HVAC systems, and the Project's own height, these on-site noise sources would not be capable of causing the ambient noise levels of nearby uses to increase by 3 dBA CNEL to or within their respective L.A. CEQA Thresholds Guide's "Normally Unacceptable" or "Clearly Unacceptable" noise categories, or by 5 dBA or greater overall.

Residential Land Uses. Noise from recurrent activities (e.g., conversation, consumer electronics, dog barking) and non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to differing degrees. The City's noise ordinance would provide a means to address nuisances related to residential noises.

The impact potential of these on-site operational noise sources would be considered less than significant.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernible; without the effects associated with the shaking of a building, there is less adverse reaction. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as the motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibration of walls, floors, and ceilings that radiate sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 dB or less. This is an order of magnitude below the damage threshold for normal buildings.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with both ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 ft from the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 ft (FTA 2006). When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. For most projects it is assumed that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, both construction of the project and the delivery truck operations could result in ground-borne vibration that may be perceptible and annoying.

Ground-borne noise is not likely to be a problem because noise arriving via the normal airborne path will usually be greater than ground-borne noise.

Ground-borne vibration has the potential to disturb people and damage buildings. It is not uncommon for construction processes (e.g., blasting and pile driving) to cause vibration of sufficient amplitudes to damage nearby buildings (FTA 2006). Ground-borne vibration is usually measured in terms of vibration velocity, either the root-mean-square (RMS) velocity or peak particle velocity (PPV). The RMS is best for characterizing human response to building vibration, and PPV is used to characterize potential for damage. Decibel notation acts to compress the range of numbers required to describe vibration. Vibration velocity level in decibels is defined as:

$$L_v = 20 \log_{10} [V/V_{ref}]$$

where L_v is the vibration velocity in decibels (VdB), “V” is the RMS velocity amplitude, and “V_{ref}” is the reference velocity amplitude, or 1×10^{-6} inches per second (in/sec) used in the United States.

Table 3.12-9 illustrates human response to various vibration levels, as described in the Transit Noise and Vibration Impact Assessment (FTA 2006).

Table 3.12-9
Human Response to Different Levels of Ground-Borne Noise and Vibration

Vibration Velocity Level	Noise Level		Human Response
	Low-Frequency[1]	Mid-Frequency[2]	
65 VdB	25 dBA	40 dBA	Approximate threshold of perception for many humans. Low-frequency sound usually inaudible; mid-frequency sound excessive for quiet sleeping areas.
75 VdB	35 dBA	50 dBA	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying. Low-frequency noise acceptable for sleeping areas; mid-frequency noise annoying in most quiet-occupied areas.
85 VdB	45 dBA	60 dBA	Vibration acceptable only if there are an infrequent number of events per day. Low-frequency noise annoying for sleeping areas; mid-frequency noise annoying even for infrequent events with institutional land uses such as schools and churches.

Source: Transit Noise and Vibration Impact Assessment, Table 7-1 (FTA 2006).
1 Approximate noise level when vibration spectrum peak is near 30 Hz.
2 Approximate noise level when vibration spectrum peak is near 60 Hz.
dBA = A-weighted decibels
FTA = Federal Transit Administration
Hz = Hertz
VdB = vibration velocity decibels

Factors that influence ground-borne vibration and noise include the following:

Vibration Source: Vehicle suspension, wheel types and condition, railroad track/roadway surface, railroad track support system, speed, transit structure, and depth of vibration source

Vibration Path: Soil type, rock layers, soil layering, depth to water table, and frost depth

Vibration Receiver: Foundation type, building construction, and acoustical absorption

Among these factors, there are significant differences in the vibration characteristics when the source is underground compared to at the ground surface. In addition, soil conditions are known to have a strong influence on the levels of ground-borne vibration. Among the most important factors are the stiffness and internal damping of the soil and the depth to bedrock. Experience with ground-borne vibration indicates (1) vibration propagation is more efficient in stiff clay soils than in loose sandy soils, and (2) shallow rock seems to concentrate the vibration energy close to the surface and can result in ground-borne vibration problems at large distances from a railroad track. Factors including the layering of the soil and the depth to the water table can have significant effects on the propagation of ground-borne vibration. Soft, loose, sandy soils

tend to attenuate more vibration energy than hard rocky materials. Vibration propagation through groundwater is more efficient than through sandy soils.

Regulatory Requirements

Based on the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment (2006) and depending on the building category of the nearest buildings adjacent to the Project Site, the potential construction vibration damage criteria vary. The FTA Transit Noise and Vibration Impact Assessment (2006) included ground-borne vibration and noise impact criteria guidance (**Table 3.12-10**).

Table 3.12-10
Ground-Borne Vibration and Noise Impact Criteria for General Assessment

Land Use Category	Ground-Borne Vibration Impact Levels (VdB re 1 µin/sec)			Ground-Borne Noise Impact Levels (dB re 20 µPa)		
	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[4]	65 VdB[4]	65 VdB[4]	N/A[5]	N/A[5]	N/A[5]
Category 2: Residences and buildings where people normally sleep.	72 VdB	76 VdB	80 VdB	35 VdB	38 VdB	43 VdB
Category 3: Institutional land uses with primarily daytime use	75 VdB	78 VdB	83 VdB	40 VdB	43 VdB	48 VdB

Source: Transit Noise and Vibration Impact Assessment, Table 8-1 (FTA 2006).
1 "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.
2 "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
3 "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
4 This criterion limit is based on levels that are acceptable for most moderately sensitive equipment (e.g., optical microscopes). Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.
5 Vibration-sensitive equipment is generally not sensitive to ground-borne noise.
µin/sec = microinches per second
µPa = micropascals
dB = decibels
dBA = A-weighted decibels
FTA = Federal Transit Administration
HVAC = heating, ventilation, and air conditioning
N/A = not applicable
VdB = vibration velocity decibels

The criteria presented in **Table 3.12-10** account for variation in project types, as well as the frequency of events, which differ widely among transit projects. Although the criteria are provided for community response to ground-borne vibration from rail rapid transit systems, they also provide useful guidelines for human response to exposure to vibration in general and are used in this analysis for vibration impact assessment. **Table 3.12-11** lists the vibration damage

criteria for various structural categories. These are identified by the FTA as criteria that should be used during the environmental impact assessment phase or environmental review process in general to identify problem locations that must be addressed during final design (FTA 2006).

Table 3.12-11
Construction Vibration Damage Criteria

Building Category	PPV (in/sec)	Approximate Lv[1]
Reinforced concrete, steel, or timber (no plaster)	0.5	102
Engineered concrete and masonry (no plaster)	0.3	98
Nonengineered timber and masonry buildings	0.2	94
Buildings extremely susceptible to vibration damage	0.12	90

Source: Transit Noise and Vibration Impact Assessment, Table 7-1 (FTA 2006).
1 Approximate noise level when vibration spectrum peak is near 30 Hz.
2 Approximate noise level when vibration spectrum peak is near 60 Hz.
dBA = A-weighted decibels
FTA = Federal Transit Administration
Hz = Hertz
VdB = vibration velocity decibels

Table 3.12-10 (criteria in terms of VdB) and **Table 3.12-11** (criteria in terms of in/sec and VdB) are used to evaluate the effects of vibration on human response and structural damage. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 102 VdB (0.5 in/sec) (FTA 2006) is considered safe and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 94 VdB (0.2 in/sec).

Construction Vibration

This construction vibration impact analysis discusses the level of human annoyance using vibration levels in VdB while vibration levels in PPV (in/sec) is best used to characterize potential for damage. As shown in Table F, the FTA guidelines indicate that a vibration level up to 102 VdB (an equivalent to 0.5 PPV [in/sec]) (FTA 2006) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 94 VdB (0.2 in/sec in PPV).

Table 3.12-12 shows the PPV and VdB values at 25 ft from the construction vibration source. As shown in **Table 3.12-12**, bulldozers and other heavy-tracked construction equipment (except for pile drivers and vibratory rollers) generate approximately 87 VdB of ground-borne vibration when measured at 25 ft, based on the *Transit Noise and Vibration Impact Assessment* (FTA 2006). This level of ground-borne vibration levels would result in potential annoyance to residences and workers located adjacent to the project site, but would not cause any damage to the buildings. Construction vibration, similar to vibration from other sources, would not have any significant effects on outdoor activities (e.g., those outside of residences in the project vicinity).

Outdoor site preparation for the project is expected to use a bulldozer and loaded truck. The greatest levels of vibration are anticipated to occur during the site preparation phase. All other phases are expected to result in lower vibration levels. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project boundary (assuming the construction equipment would be used at or near the project boundary) because vibration impacts occur normally within the buildings. The formula for vibration transmission is provided below.

$$L_vdB\ (D) = L_vdB\ (25\ ft) - 30\ Log\ (D/25)$$

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

Table 3.12-13 lists the projected vibration level from various construction equipment expected to be used on the project site to the sensitive uses in the project vicinity. For typical construction activity, the equipment with the highest vibration generation potential is the large bulldozers, which would generate 87 VdB at 25 ft. The closest structure, which is associated with the health service/ rehabilitation facility (United Cerebral Palsy), is approximately 25 ft from the northern project construction boundary. As shown in **Table 3.12-13**, the closest structure would experience vibration levels of up to 87 VdB (0.089 PPV [in/sec]). Other buildings in the project area are farther away and would experience lower vibration levels. Construction vibration levels at the closest structure from construction equipment or activity would not exceed the FTA threshold of 94 VdB (0.2 in/sec PPV) for building damage when bulldozers and loaded trucks operate approximately 100 ft of the project construction boundary. Although construction vibration levels at the rehabilitation facility and residential uses would have the potential to result in annoyance, these vibration levels would not result in damage and no longer occur once construction of the project is completed. Therefore, construction vibration levels would be less than significant. No mitigation measures are required.

Table 3.12-12
Vibration Source Levels for Construction Equipment

Equipment	PPV at 25 ft (in/sec)	Approximate Lv[1] at 25 ft (VdB)
Pile Driver (Impact), Typical	0.644	104
Pile Driver (Sonic), Typical	0.170	93
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer	**0.089**	**87**
Caisson Drilling	0.089	87
Loaded Trucks	**0.076**	**86**
Jackhammer	**0.035**	**79**
Small Bulldozer	0.003	58

Sources: Table 12-2. Transit Noise and Vibration Impact Assessment (FTA 2006).
Note: Equipment and associated source vibration levels that are expected to be used on the project site are shown in **bold**.
1 RMS velocity in decibels (VdB) re 1 micro-inch/second.
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inches per second
LV = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square (velocity)
VdB = velocity decibels

Table 3.12-13

Summary of Construction Equipment and Activity Vibration

Land Use	Direction	Equipment/ Activity	Reference Vibration Level (VdB) at 25 ft	Reference Vibration Level (PPV) at 25 ft	Distance (ft)	Maximum Vibration Level (VdB)	Maximum Vibration Level (PPV)
Health Service/ Rehabilitation Facility	North	Large Bulldozers	87	0.089	25	87	0.089
		Loaded trucks	86	0.076	25	86	0.076

Source: Compiled by LSA (2018).
Note: The FTA-recommended building damage threshold is 94 VdB (0.2 PPV [in/sec]) at the receiving property structure or building.
ft = feet
PPV = peak particle velocity
VdB = vibration velocity decibels
in/sec = inches per second
FTA = Federal Transit Administration

Long-Term Vehicular Traffic Vibration Impacts

Project operations would not involve any vibration sources that would cause exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels. Project-related vehicles with rubber tires on roadway segments surrounding the Project Site would not generate any significant ground-borne vibration that would exceed the threshold of perception of 65 VdB. No significant ground-borne vibration impacts would occur. No mitigation is required.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact.

Long-Term Train Noise Impacts

As discussed above, the UPRR Railway tracks, which also carry Amtrak and Metrolink trains, runs north of the Project Site with 22 freight trains, five Amtrak trains, and 11 Metrolink trains per day that operate 7 days per week, 24 hours per day. The FTA's 2006 Transit Noise and Vibration Impact Assessment manual was used to evaluate train related noise impacts. Using the FTA's guidelines, it is calculated that train operations in the study area would result in a noise level of 67.9 dBA CNEL at 50 ft from the train tracks. The northern boundary of the Project Site is 600 ft from the centerline of the train tracks. Train noise is a line source with 4.5 dBA reduction per doubling of distance (noise reduction from a line source is based on 15Log (D_2/D_1), where D_1 in this case is 50 ft and D_2 is the distance from the line source to the location of concern). At this distance, train noise would be reduced to 51.7 dBA CNEL at the northern project boundary. Multiple intervening structures and terrain changes from rail line to the Project Site would provide a noise reduction of 5 dBA and noise levels generated from train operations would be reduced to 46.7 dBA CNEL. This noise level would not be added to the project's noise environment because the eastern side of the project would be exposed to traffic noise levels of 70 dBA CNEL and the western side of the project would be exposed to traffic noise levels of 59 dBA CNEL from Topanga Canyon Boulevard/Santa Susana Avenue. Therefore, no on-site train noise impacts would occur from long-term train operations. No mitigation is required.

Long-Term Traffic Noise Impacts

The FHWA Highway Traffic Noise Prediction Model (FHWA RD-77-108; 1977) was used to evaluate highway traffic-related noise conditions along roadway segments in the project vicinity. A two percent annual growth rate from the city's 2015 traffic data was used to project the daily traffic volume for opening year condition and 2030 (future build-out condition) in the project vicinity. The traffic noise levels were modeled using vehicle speeds of 45 mph along Topanga Canyon Boulevard in the project area. The standard vehicle mix for Southern California roadways was used for traffic on this roadway segment. The modeled 24-hour CNEL levels are shown in **Tables 3.12-14 and 3.12-15** for the opening year and the future build-out (2030) conditions, respectively. These noise levels represent the worst-case scenario, which assumes no shielding is provided between traffic and the location where the noise contours are drawn.

Table 3.12-14
Opening Year Traffic Noise Levels

Roadway Segment	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane
Topanga Canyon Boulevard at Santa Susana Avenue	50,100	103	218	468	72.8

Source: Compiled by LSA (2018).
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
ft = feet

Table 3.12-15
Future Build-Out Year (2030) Traffic Noise Levels

Roadway Segment	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane
Topanga Canyon Boulevard at Santa Susana Avenue	64,800	121	259	556	73.9

Source: Compiled by LSA (2018).
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
ft = feet

The project would generate a total of 191 vehicle trips on a daily basis. This is much fewer than the daily traffic volume on Topanga Canyon Boulevard and would not result in any measurable increase in traffic noise levels along Topanga Canyon Boulevard. Noise level changes of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, no project-related traffic noise level impacts would occur for off-site noise-sensitive land uses. The proposed land uses are residential uses and are considered noise-sensitive.

The following section discusses the traffic noise on the Project Site resulting from traffic on Topanga Canyon Boulevard/Santa Susana Avenue.

Topanga Canyon Boulevard/Santa Susana Avenue. **Table 3.12-15** shows that the 70 dBA CNEL along Topanga Canyon Boulevard would extend to 121 ft from the roadway centerline. The proposed residential buildings are approximately 110 ft from the roadway centerline of Topanga Canyon Boulevard/Santa Susana Avenue, where the traffic noise levels would range up to 70.6 dBA CNEL. Outdoor active use areas (e.g., backyards) associated with dwelling units closest to Topanga Canyon Boulevard/Santa Susana Avenue would be exposed to traffic noise exceeding the City's 65 dBA CNEL standard for residential uses. **Project Design Feature PDF-Noise-1** (e.g., noise barriers) would be required for outdoor active use areas for the three front-row dwelling units along Topanga Canyon Boulevard/Santa Susana Avenue.

Based on the United States Environmental Protection Agency (EPA) *Protective Noise Levels* (EPA 1978), a combination of exterior walls, doors, and windows, standard construction for Southern California (warm climate) provides at least 12 dBA of exterior-to-interior noise attenuation with windows and doors open, and 24 dBA with windows and doors closed (the national average is 15 dBA with windows and doors open and 25 dBA with windows and doors closed). With windows or doors open, interior noise levels would exceed the 45 dBA CNEL interior noise threshold (70.6 dBA - 12 dBA = 58.6 dBA). Therefore, mechanical ventilation systems such as air conditioning are required for all proposed residential dwelling units to ensure that windows and doors can remain closed for a prolonged period of time to meet the interior noise standard. See **Project Design Feature PDF-Noise 2**.

With windows and doors closed, interior noise levels for the three front-row dwelling units along Topanga Canyon Boulevard/Santa Susana Avenue would be 46.6 dBA CNEL (70.6 dBA -

24 dBA = 46.6 dBA) and would exceed the 45 dBA CNEL interior noise standard. Therefore, building façade upgrades (e.g., windows) with sound transmission class (STC) ratings higher than standard building construction (STC-24 to STC-28) would be required. Based on the above analysis, it is estimated that windows with a minimum STC-30 would be required for the three front-row dwelling units along Topanga Canyon Boulevard/Santa Susana Avenue. See **Project Design Feature PDF-Noise-3**. Other dwelling units with standard building construction would meet the interior noise standard of 45 dBA CNEL with windows and doors closed.

Based on the analysis, the Project would not exceed the City's interior and exterior noise standards with the implementation of the identified project design features.

Project Design Features

PDF-Noise-1 A noise barrier with a minimum height of 6 ft above ground will be implemented along the perimeter of the outdoor active use areas, such as backyards, associated with the three front-row dwelling units along Topanga Canyon Boulevard/Santa Susana Avenue.

PDF-Noise-2 Mechanical ventilation systems such as air conditioning are required for all proposed residential dwelling units.

PDF-Noise-3 Building façade upgrades such as double-paned windows with a minimum STC rating of 30 are required for the three front-row dwelling units along Topanga Canyon Boulevard/Santa Susana Avenue.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact with Mitigation*.*

As discussed earlier, construction activities would temporarily increase ambient noise levels at nearby receptors. Any other future developments that are built concurrently with the Project could further contribute to these temporary increases in ambient noise levels. However, given the ambient noise levels of the Project area, it is unlikely that construction noises from any concurrent developments (related projects) would be audible at Project receptors, let alone capable of contributing to cumulatively considerable noise increases. Persistent traffic noise on Topanga Canyon Boulevard would mask any distant construction sounds in a manner largely similar to the effect of white noise, and the presence of numerous multi-story structures would further obstruct these sounds' line of sight travel.

In addition, any other related project would be required to comply with the City's noise ordinance, as well as implement any mitigation measures that may be prescribed pursuant to CEQA. Project construction noise levels would exceed the City's construction noise level standard of 75 dBA L_{max} at a distance of 50 ft because construction activities would occur between 7:00 a.m. and 10:00 p.m. within 500 ft of a residential zone. The implementation of

Mitigation Measures MM-Noise-1 through **MM-Noise-5** listed above would be required to reduce potential construction noise impacts to less than significant.

With respect to cumulative traffic noise impacts, it should be noted that the Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Traffic Impact Study. Given these considerations, Project construction activities would not be expected to contribute to significant cumulative construction noise impacts.

e) For a proposed 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 proposed project expose people residing or working in the project area to excessive noise levels?

No Impact.

The Project Site is located 7.5 miles west of the Van Nuys Airport. Therefore, it would not expose workers or residents to such elevated noise levels from aircraft. No impact would occur.

f) For a proposed project within the vicinity of a private airstrip, would the proposed project expose people residing or working in the proposed project area to excessive noise levels?

No Impact.

The Project is not located within the vicinity of any private airstrip. As a result, the Project would not expose any people to excessive noise levels associated with any private airstrip activities. Therefore, the Project would not result in an impact related to private airstrip noise levels.

13. POPULATION AND HOUSING

a) Would the project 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)?

Less Than Significant Impact.

A significant impact would occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

Localized Growth Forecasts

The following tables provide different geographic scales of population and housing, from the community plan and citywide.

Table 3.13-1 Population and Households in the City of Los Angeles, lists the 2010 and 2017 population, households, and subsequent persons/housing ratio, the SCAG forecast for 2035.

Table 3.13-2 shows the SCAG planned growth of the City of Los Angeles in population, housing, and employment from 2014 to 2035.[115]

Table 3.13-3, Population and Households in the Community Plan Area, provides data from the Chatsworth-Porter Ranch CP, adopted in 1993, and the more recent 2015 Growth and Infrastructure Report.[116]

Table 3.13-1
Population and Households in the City of Los Angeles

Year	Population	Households	Persons/Household
2010	3,792,621	1,412,006	2.69
2017	4,041,707	1,469,845	2.75
2035	4,442,500	1,618,900	2.75
Change 2010 to 2017	**+249,086**	**+57,839**	**+0.06**
Change 2017 to 2035	**+400,793**	**+149,055**	**0.00**

Ratio rounded up to nearest second decimal point.
2010: Census data, reported 4/1/2010.
2017: As of January 1, 2017, Department of Finance:
http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/
2035: Based on the adopted 2016-2040 Regional Transportation Plan by SCAG:
http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf.
Table: CAJA Environmental Services, August 2017.

[115] The 2014 data was from a May 2015 report and profile. The 2035 projection was from the 2016 RTP adopted April 2016.

[116] Los Angeles City Planning: 2015 Growth and Infrastructure Report, November 1, 2016: http://planning.lacity.org/policyinitiatives/GrowthandInfrastructure/2015Rpt.pdf

Table 3.13-2
SCAG Population, Housing and Employment of the City of Los Angeles

	Population	Housing (units)	Employment (jobs)
2014	3,904,657	1,432,553	1,753,559
2035	4,442,500	1,618,900	2,104,100
Change (2014-2035)	+537,843	+186,347	+350,541

2014: SCAG Local Profile for City of Los Angeles, dated May 2015:
http://www.scag.ca.gov/Documents/LosAngeles.pdf
2035: Based on the adopted 2016-2040 Regional Transportation Plan by SCAG:
http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf
Table: CAJA Environmental Services, August 2017.

Table 3.13-3
Population and Housing Units in the Community Plan Area

	2010 Census	2015 Estimate	Change 2010-2015
Population	93,251	102,323	+9,072
Housing Units	34,031	35,473	+1,442

2010 Census: Census data, reported 4/1/2010.
2015 Estimate: City Planning Dept, Demographics Research Unit, Population/Housing Estimate, 2015 Growth and Infrastructure Report.
Table: CAJA Environmental Services, August 2017.

Construction Impacts

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts will not result from construction of the Project. Therefore, construction-related population growth impacts will be less than significant.

Operational Impacts

Population generation is shown in **Table 3.13-4**. It is estimated that the Project would have approximately 76 residents. This is a conservative estimate as it does not take into account the residential bedroom mix. This analysis is conservative and does not take into account the removal of existing uses, which are vacant.

Table 3.13-4
Project Estimated Population Generation

Land Use	Quantity	Population Generation Rates	Total Population
Residential	19 DUs	4 persons / DU	76
		Proposed Population	**76**

Note: DU = dwelling unit
Source: The 2017 Department of Finance data shows that the average household size in Los Angeles is 2.75 persons/household. For a conservative analysis, this assumes 4 persons/household.
Table: CAJA Environnemental Services, November 2018.

The Project would not create a unique use which would compel substantial new workers to the area to fill the demand created by the Project. Rather the jobs would most likely be filled by workers already living within the Los Angeles area since there is a sufficient unemployed workforce in the area to fill that demand. The September 2018 unemployment rate in the Los Angeles-Long Beach-Glendale area is approximately 4.8 percent.[117] Thus, there is still potential for local residents to fulfill the demand for jobs that this Project would generate.

The Project would not conflict with SCAG's projections for the City of Los Angeles, or represent a significant population or housing increase as compared to existing levels. The Project would be consistent with SCAG's growth projections which are based on macroeconomic data and socioeconomic variables independent of parcel-level land use designation and zoning. Thus, the Project does not represent a substantial or significant growth as compared to the existing characteristics. The potential to induce substantial growth may be indicated by the introduction of a project in an undeveloped area or the extension of major infrastructure.[118] The Project does not include introduction of development in an undeveloped area or the extension of major infrastructure (such as public roadways and bridges). Accordingly, the Project would result in a less than significant impact to population and housing.

Housing Element

The City updated its Housing Element portion of the General Plan for the period of 2013-2021. On December 3, 2013, the City Council adopted the update to the Housing Element of the General Plan.[119] The Housing Element provides the Regional Housing Needs Assessment (RHNA) allocation, which is the number of housing units that each community must plan for and accommodate during the 8-year period. The Housing Element does not alter the development potential of any site in the City, nor modify land use of the Zoning Code. It also does not undermine, in any way, neighborhood planning efforts such as Community Plans, Specific Plans or Historic Preservation Overlay Zones. While the State requires the City to evaluate and plan for the existing capacity to accommodate future projected growth, the

[117] Bureau of Labor Statistics: http://www.bls.gov/eag/eag.ca_losangeles_md.htm.
[118] LA City CEQA Thresholds Guide, page J.1-3.
[119] City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm.

Housing Element does not have any material effect on development patterns, nor specify areas for increased height or density.[120]

The Project will not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.[121] The Project, which is adding 19 housing units to the City's stock, will not result in a net loss of housing inventory in the area.

Infrastructure Impacts

The Project Site is infill, and surrounded by other residential uses. It would not expand the development of residential uses to an edge area. Rather the Site acts as a transitional zone between the rural edge and more developed area along Topanga Canyon. Impacts would be less than significant.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact.

A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. A loss is considered to be equal to or greater than a one-half block equivalent of habitable housing units (One-half block is generally equivalent to 15 single-family or 25 multi-family dwelling units.). The Project would remove two single family homes, retain one home, and construct lots to support 19 homes (18 new). The Project Site will not be displacing substantial number of existing housing. Therefore, impacts will be less than significant.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact.

A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. A loss is considered to be equal to or greater than a one-half block equivalent of habitable housing units (One-half block is generally equivalent to 15 single-family or 25 multi-family dwelling units.). The Project would remove two single family homes, retain one home, and construct lots to support 19 homes (18 new). The Project Site will not be displacing a substantial number of people. Therefore, impacts will be less than significant.

[120] City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm.

[121] City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.

14. PUBLIC SERVICES

a) Would the project 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:

i) Fire protection?

Less Than Significant Impact.

A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project, and a new or physically altered fire station would be necessary. LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. A total of 1,104 uniformed firefighters (included 242 serving as Firefighters/Paramedics), are always on duty at 106 neighborhood fire stations located in the LAFD's 471-square-mile jurisdiction.[122] Pursuant to Table 507.3.3 of the 2014 Fire Code, the maximum response distance between low density residential land use and a LAFD station that houses an engine company[123] is 1.5 mile and a station that houses a truck company[124] is 2 miles. If these response distances are exceeded, installation of an automatic fire sprinkler system is required.[125] The Project Site is served by several fire stations, as shown in **Table 3.14-1, Fire Stations**.

Response Distance

The Project Site is located within the distance identified by the Fire Code. There is a station with an engine and truck (Assessment Light Force)[126] at 1.5 miles. Additionally, the Project will be constructed with fire protection as required by the LAFD Chief or applicable building and safety codes, unless other building and safety codes supersede this. The LAFD goal is to reach Emergency Medical Service (EMS) incidents within 5 minutes 90 percent of the time and fire incidents within 5:20 minutes 90 percent of the time. The Project is within the maximum response distance of a fire station with adequate equipment. There are additional fire stations located nearby. Impacts related to response distance would be less than significant.

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122 http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

123 LAFD: All LAFD Engines are Triple Combination apparatus, meaning they can pump water, carry hose, and have a water tank: http://lafd.org/about/apparatus.

124 LAFD: Aerial Ladder Fire Engines: http://lafd.org/about/apparatus.

125 http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

126 A Truck Company runs with a single Engine in a configuration called a "Light Force." Or, when running with two engines, the term "Task Force" is used.

Table 3.14-1
Fire Stations

No.	Address	Distance	Equipment	Ave. Time (Turnout + Travel)	Incident Counts
96	21800 Marilla St	1.5 miles	Assessment Light Force Paramedic Ambulance Rescue Ambulance	EMS: 5:52 min Non-EMS: 6:00 min.	EMS: 1,525 Non-EMS: 243
107	20225 Devonshire	2.5 miles	Engine Paramedic Ambulance	EMS: 4:43 min Non-EMS: 4:39 min.	EMS: 987 Non-EMS: 173

Incident counts: year 2017 (January to July). Non-EMS is fire emergency. EMS is emergency medical service.
Response Time: year 2016 (January to July) average time (turnout time + travel time) in the station area.
Response time listed above does not include call processing, which averages 1:02 minutes citywide in 2017. Call processing is done at a central location and does not differ by fire stations.
Fire Department Call Processing Time: The time interval that starts when the call is created in CAD by a Fire Dispatcher until the initial Fire or EMS unit is dispatched.
Turnout Time: The time interval between the activation of station alerting devices to when first responders put on their personal protective equipment and are aboard apparatus and en-route (wheels rolling). Both station alarm and en-route times are required to measure this for each unit that responds.
Travel Time: The time interval that begins when the first unit is en route to the incident and ends upon arrival of any of the units first on scene. This requires one valid en-route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events and unspecified incident locations, may impact travel time.
Incident Count: The number of incidents that result in one or more LAFD units being dispatched, regardless of record qualification.
http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf
Task Force: Truck company and two fire engines.
LAFD April 2016 Fire Station Directory.
Table: CAJA Environmental Services, August 2017.

Emergency Access

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site (i.e. Topanga Canyon). The routes from the fire stations to the Project Site would likely pass through several of the study intersections. Based on the nominal level of net new project-related traffic, the Project will not produce significant impacts at any of the intersections or streets in the project vicinity.[127]

All circulation would be in compliance with the Fire Code, including any access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts related to emergency access would be less than significant.

Fire Flow

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the zoning of the area, type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-

[127] Trip Generation Assessment, Hirsch/Green, August 2017.

density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing.[128] The following fire hydrants are near the Site:[129]

- Hydrant (ID 71415, size 2½ x 4D, 12-inch main) on west corner of Santa Susana.

Upgrades to the hydrants and system will be evaluated at the plan check phase. The Project will submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the project area is sufficient. If it is not, then onsite or offsite upgrades to the existing infrastructure, as determined by the LADWP and LAFD shall be required to be made by the Applicant.

No changes are planned in the near future for new or expanded fire stations in the area. The Project will comply with the required regulations and feasible recommendations of the Fire Department relative to fire safety and emergency access, and shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department prior to the approval of a building permit. This allows the LAFD to ensure that the Project will not increase demand on the fire department to the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment.

ii) Police protection?

Less Than Significant Impact.

A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. The Project Site is served by the City of Los Angeles Police Department's (LAPD) Valley Bureau, which oversees LAPD operations in the Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley communities.[130]

The Devonshire Community Police Station, located at 10250 Etiwanda Avenue, is approximately 5 miles driving distance from the Project Site. The boundaries of the Station are as follows: LA City boundaries to the north and west; Roscoe to the south; and I-405 freeway to the east.[131]

Deployment

Deployment of police officers to existing area stations in the City is based on a number of factors and is not calculated solely based on police-need-per-population standards. The LAPD presently uses a quantitative workload model, known as Patrol Plan, to determine the deployment level in each of the area stations. Patrol Plan, which was developed by a private

[128] LAMC Sec. 57.09.06, Fire Flow: https://law.resource.org/pub/us/code/city/ca/LosAngeles/Municipal/chapter05.pdf.
[129] Navigate LA, DWP (Fire Hydrants) Layer: http://navigatela.lacity.org/navigatela/
[130] LAPD, Valley Bureau: http://www.lapdonline.org/valley_bureau
[131] http://assets.lapdonline.org/assets/pdf/Devonshire_RD_09.pdf

consultant, is a computer program which mathematically formulates 25 data variables (factors) to provide patrol officer deployment recommendations for the 18 geographic areas in the City to meet predetermined constraints (response time and available time). These factors include patrol speed, number of units fielded, forecast call rate, percent of calls with additional units dispatched, average service time, dispatching policy, percent of calls dispatched by priority, square miles of an area, average travel time and street miles (length of streets, alleys and other routes in an area). Police units are in a mobile state; hence the actual distance between the Station and the Project Site is often not relevant to service performance. Instead the realized response time is more directly related to the number of officers deployed. Police assistance is prioritized based on the nature of a call.

Crime Rate

Crime statistics (Part 1 violent and property crimes) are shown in **Table 3.14-2, Crime Statistics**. The crime rate, which represents the number of crimes reported, affects the "needs" projection for staff and equipment for the LAPD to some extent.

Table 3.14-2
Crime Statistics

Type of Crime	Devonshire	Citywide
Homicide	2	169
Rape	33	1,140
Robbery	154	6,798
Aggravated Assault	264	10,570
Burglary	775	10,140
Motor Vehicle Theft	448	12,030
Burglary Theft from Vehicle	1,156	20,168
Personal/Other Theft	1,034	19,588
Total (Part 1 Crimes)	**3,906**	**80,603**
Year-to-date: August 19, 2017 Devonshire: http://assets.lapdonline.org/assets/pdf/devprof.pdf Citywide: http://assets.lapdonline.org/assets/pdf/cityprof.pdf Table: CAJA Environmental Services, August 2017.		

Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site.

The Project Site is open and accessible from all sides. All sides will need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services (see **Project Design Feature PDF-**

Police-1). These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. This measure would reduce potential construction impacts on police protection services to less than significant.

Operational Impacts

The Project would increase the number of people at the Site. As such, the Project could potentially increase in the number of police service calls due to an increase in onsite persons. The LAPD will require that the commanding officer of the Station Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response (see **Project Design Feature PDF-Police-2**). The Project will not require the construction of a new or expanded police station. These features will ensure the impacts associated with police services to less than significant.

Moreover, the Project will contribute sales and property tax revenue into the City's General Fund which can be used to fund additional resources in accordance with the planning and deployment strategies of the LAPD. The Project would not require the construction of a new or expanded police station. Project design features would reduce the impacts associated with police services to less than significant.

Project Design Features

PDF-Police-1 Public Services (Police – Demolition/Construction Sites)

Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

PDF-Police-2 Upon completion of the Project, the Devonshire Area commanding officer shall be provided with a diagram of each portion of the property. The diagram shall include access routes and any additional information that might facilitate police response.

iii) Schools?

Less Than Significant Impact.

A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for additional school facilities. The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:[132]

- Chatsworth Park Elementary School (K-5), located 22005 Devonshire Street.

[132] LAUSD School Finder: http://rsi.lausd.net/ResidentSchoolIdentifier/.

- Ernest Lawrence Middle School (6-8), located 10100 Variel Avenue.
- Chatsworth Charter High School (9-12), located at 10027 Lurline Avenue.

Enrollment Capacities

As shown on **Table 3.14-3**, the Project would generate a total increase of approximately 14 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD. As discussed below, payment of required school fees is deemed to provide full and complete mitigation.

Table 3.14-3
Project Estimated Student Generation

Project		Students Generated			
Source	**Quantity**	**Elementary**	**Middle**	**High**	**Total**
Residential units	20	8	2	4	**14**
Total		**8**	**2**	**4**	**14**

Residential land uses: Elementary: 0.4 students per household; Middle: 0.1 students per household; High: 0.2 students per household
Source (rates): LAUSD 2012 Developer Fee Justification Study, February 9, 2012.
Table: CAJA Environmental Services, August 2017.

Proximity to Schools

The Project Site is within one-quarter mile of the following schools:[133]

- Meraj Academy, 11070 Old Santa Susana, 400 feet north of the Project Site.
- Academy for Advancement of Children with Autism, 10824 Topanga Canyon, 550 feet southeast of the Project Site.

The schools are generally shielded from the Project Site by intervening residential buildings. These intervening structures and redundant street network ensure that construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Construction activities would be limited to on-site work. Therefore, no impact would occur.

School Fees

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or

[133] LAUSD and Google Maps.

reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, impacts related to schools will be less than significant.

iv) Parks?

Less Than Significant Impact.

A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons).

Table 3.14-4, Parks, lists the parks and open space areas that are located nearby the Project Site. While the LADRP is currently in the process of implementing the 50 Parks Initiative, these are small pocket parks typically less than half an acre, often only one tenth of an acre, and have a service radius of one half mile. None of these parks will be sited within half mile from the Project Site.

Table 3.14-4
Parks

Name	Address
Stoney Point Park	On Topanga Canyon Blvd, between Chatsworth St & 118 Freeway
Chatsworth Park North	22300 Chatsworth Street
Garden of the Gods Park	Redmesa Road and Santa Susana
Santa Susana	9853 Andora Avenue
NavigateLA with Recreation and Parks Department layer: http://navigatela.lacity.org/navigatela/ Table: CAJA Environmental Services, August 2017.	

The LAMC provides for the payment of parks fees, depending on the nature of the development:

- Pursuant to LAMC Section 17.12-A or 17.58, the applicant shall pay the applicable Quimby fees for the construction of dwelling units.

- Pursuant to LAMC Section 12.33, the applicant shall pay the applicable fees for the construction of dwelling units if using a zone change.

Although project residents would use the private on-site open spaces, it is reasonably foreseeable that Project residents would also use nearby parks and recreation facilities. However, with the provided on-site and open space and payment of applicable fees, impacts would be less than significant.

v) Other public facilities?

Less Than Significant Impact.

A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the Project Site. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library, 8 regional branches, and 64 community branches. The LAPL collection has 6.4 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.[134] On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for communities with less than 45,000 people, 14,500 square feet for community with more than 45,000 people, and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. **Table 3.14-5** describes the libraries that would serve the Project.

The Project would not directly necessitate the need for a new library facility. This is because the LAPL has indicated that there are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community. The LAPL uses the most recent Census figures to determine if a branch should be constructed in a given area. The *L.A. CEQA Thresholds Guide* considers features (on-site library facilities, direct support to LAPL) that would reduce the demand for library services. It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations.[135, 136] Further, Measure L has provided funds to restore adequate services to the existing library system. For all of these reasons, it is not anticipated that the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Impacts to library service would be less than significant.

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134 LAPL website: http://www.lapl.org/about-lapl/press/2012-library-facts.

135 "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": http://www.nea.gov/research/toread.pdf.

136 "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: http://old.diglib.org/use/whitepaper.htm.

Table 3.14-5
Los Angeles Public Libraries

Name	Address	Size (sf)	Volumes/Circulation	Current Service	Staff
Chatsworth	2105 Devonshire Street	12,500	53,745 / 188,634	52,903	13.5
Northridge	9051 Darby Avenue	12,500	58,994 / 179,960	66,761	9.5
Porter Ranch	11371 Tampa Avenue	12,300	58,469 / 167,778	35,382	8.5

Staffing is full-time equivalent. Current Service – 2010 Census.

The LAPL does not make targeted projections but rather uses the most recent Census figures to determine if a branch should be constructed in a given area, according to the new Branch Facilities Plan.

Table: CAJA Environmental Services, August 2017.

15. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact.

A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities.

The Project would increase the number of residents at the Project Site. The nearby parks and the open space provided on the Project Site are discussed under Section 14.iv. Parks, above. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of required fees and private open space will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact.

A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of required fees and private open space will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts would be less than significant.

16. TRANSPORTATION/TRAFFIC

This section is based, in part, on the following items, included as Appendix I of this IS/MND:

I-1 Trip Generation Assessment, Hirsch/Green Transportation Consulting, Inc. August 25, 2017.

I-2 LADOT Approval Letter, May 23, 2018.

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for 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?

Less Than Significant Impact.

A significant impact may occur if roadways and intersections that would carry project-generated traffic would exceed adopted City of Los Angeles Department of Transportation (LADOT) thresholds of significance.

Methodology

Based on the trip generation thresholds identified in LADOT current Transportation Impact Study Guidelines (dated December 2016), the project will not produce sufficient net new traffic to warrant the preparation of a detailed traffic impact analysis. Specifically, LADOT identifies that projects that generate fewer than 500 net daily trips and/or 43 net trips during either the AM or PM peak hours are not typically required to prepare a detailed traffic impact analysis, as incremental traffic increases at or below these levels are not likely to produce significant traffic impacts to nearby intersections or project-area streets.

Calculations indicate that the development of the Project, including the removal of the existing on-site uses (and their associated traffic), is expected to result in a net increase in site-related trips of only about 162 net new trips per day, including increases of approximately 12 net new trips (3 inbound, 9 outbound) during the AM peak hour and 17 net new trips (11 inbound, 6 outbound) during the PM peak hour. As such, the Project is expected to result in far fewer net new trips than would typically be necessary to require the preparation of a detailed traffic impact analysis. Further, while LADOT reserves the right to request that any development project prepare a traffic study based on a variety of factors beyond the number of anticipated net new trips, review of the Project's site plan and anticipated operations indicates that no "special circumstances" exist that would warrant a traffic impact analysis for the Project.

Project Trip Generation Assessment

The first step in evaluating the potential for traffic impacts resulting from the Project involved the calculation of the number of net new trips that could result from its development. The trip

generation rates used in this analysis to estimate the amount of traffic produced by both the existing on-site and Project's residential uses were obtained from the 9th Edition of the Trip Generation manual[137], published by the Institute of Transportation Engineers (ITE). This publication identifies the typical traffic-generating characteristics for a variety of land uses, including single-family detached housing units such as those proposed, and is the primary source for the trip generation information used in most traffic studies conducted throughout the Southern California region, including the City of Los Angeles and most surrounding jurisdictions. The trip generation rates used to estimate the number of trips generated by both the existing and proposed single-family residences are identified in **Table 3.16-1**.

Table 3.16-1
Existing and Proposed Project Uses Trip Generation Rates

Use	Daily	AM Peak Hour	PM Peak Hour
Single Family Detached Housing	T = 9.52 (U)	T = 0.75 (U); I/B = 25%, O/B = 75%	T = 1.00 (U); I/B = 63%, O/B = 37%
Where: T = Trip Ends I/B = Inbound Trip Percentage U = Number of Residential Units O/B = Outbound Trip Percentage Note: All trip generation rates and information per 9th Ed. ITE Trip Generation Source: Trip Generation Assessment, Hirsch/Green Transportation Consulting, Inc. August 25, 2017 Table by CAJA Environmental Services, August 2017.			

It should be noted that the "baseline" trip generation rates shown in **Table 3.16-1** are typically derived from actual counts of vehicles entering and exiting the driveways of the subject land uses, and as a result, do not generally account for a number of factors that can influence the amount of "net" traffic generated by a specific development. For typical residential developments such as the one proposed, the most pertinent of these factors involves the use of public transportation by project residents. However, the Project Site is not currently served by any transit services that provide stops within convenient walking distance (typically about one-quarter of a mile). The nearest existing public transportation service in the immediate project vicinity is provided by Simi Valley Transit (Route C), which exhibits a westbound stop located at the intersection of Topanga Canyon Boulevard and Chatsworth Street, just over one-quarter mile south of the Project Site, and an eastbound stop more than three-quarters of a mile from the Project Site at Topanga Canyon Boulevard and Devonshire Street. Therefore, in order to provide for a conservative estimate of the potential trip generation of the Project, no adjustments to account for potential public transit usage by project residents were assumed in this evaluation. As such, using only the "baseline" ITE trip generation rates shown earlier in **Table 3.16-1**, the number of trips generated by the Project was calculated, and are summarized in **Table 3.16-2**.[138]

[137] Trip Generation, 9th Edition, Institute of Transportation Engineers, Washington, D.C., 2012.

[138] The Project was revised to include 18 new units, instead of 19 new units. The traffic study assumed 19 new units and thus provides a larger, more conservative analysis.

Table 3.16-2
Project and Existing Site Uses Trip Generation Estimates

Use	Size	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Proposed Project								
Single Family Detached Housing	19 unit	181	3	11	14	12	7	19
Less Existing Uses (Removed)								
Single Family Detached Housing	2 unit	19	0	2	2	1	1	2
Net New Project Trips		**162**	**3**	**9**	**12**	**11**	**6**	**17**
Existing Uses (to remain)								
Single Family Detached Housing	1 unit	10	0	1	1	1	0	1
Total Site Access (Driveway) Volumes *		**191**	**3**	**12**	**15**	**13**	**7**	**20**

*Includes 19 new and 1 existing single-family residences.
Source: Trip Generation Assessment, Hirsch/Green Transportation Consulting, Inc. August 25, 2017.

As shown in **Table 3.16-2**, the Project itself is expected to produce a total of approximately 181 trips per day, including about 14 trips (3 inbound, 11 outbound) during the AM peak hour, and about 19 trips (12 inbound, 7 outbound) during the PM peak hour. These values are well below LADOT's minimum trip thresholds for requiring a detailed traffic impact study. However, as briefly discussed earlier, the demolition of two of the existing on-site single-family residences in order to construct the Project will also result in the removal of their associated trips from the "existing" area traffic volumes, thereby offsetting some of the new traffic expected to be generated by the Project. As also identified in **Table 3.16-2**, these existing uses generate a total of approximately 19 daily trips, including about 2 trips (0 inbound, 2 outbound) during the AM peak hour, and about 2 trips (1 inbound, 1 outbound) during the PM peak hour. Therefore, once it is constructed and fully occupied (including the removal of two of the three existing on-site residences and their associated traffic), it is anticipated that the Project will result in a net increase in site-related trips of approximately 162 daily trips, including a net increase of about 12 trips (3 inbound, 9 outbound) during the AM peak hour, and a net increase of about 17 trips (11 inbound, 6 outbound) during the PM peak hour.

Note that, as further shown in **Table 3.16-2**, the traffic associated with the one existing single-family residence that will remain on the Project Site already occurs on the area roadway network, and as a result, any trips attributable to this use are included in the existing traffic utilizing the area roadways, and will not affect the existing or future traffic volumes in the project vicinity beyond the levels that would be experienced without the development of the new project.

The trip generation calculations summarized in **Table 3.16-2** confirm that the development of the Project, including the removal of the existing on-site uses and their associated trips, will result in only relatively nominal increases in daily, AM peak hour, and PM peak hour trips from the Project Site. As a result, the Project will not meet LADOT's current minimum trip generation thresholds for preparation of a detailed traffic impact study, and consequently, the Project is not

required to prepare any such analyses. Further, the project-related trips are expected to disperse throughout the street and highway network surrounding the Project Site (travelling both north and south of the Project Site on Topanga Canyon Boulevard, as well as east and west along the Simi Valley (SR-118) Freeway, Chatsworth Street, Devonshire Street, and other area roadways), and as such, the potential project-related traffic increases at any individual intersection or on any particular street or highway will be minimal. Therefore, the Project will not result in significant impacts to any intersections or streets in the project vicinity.

Construction

LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. The Project developer will park and stage for construction on-site as much as possible. During portions of the construction where off-site street surfaces are needed, the developer will submit for review and approval a traffic control plan detailing days, time of day, and safety features. Any off-site construction needs will be minimized and be conducted outside of peak traffic times. Construction worker vehicles that cannot be accommodated on site will be provided off-street parking and shuttle service to the site if needed. The Applicant will adopt **Project Design Feature PDF-Traffic-1** for construction impacts. Therefore, construction impacts would be less than significant.

Project Design Feature

PDF-Traffic-1 A Construction Traffic/Management Plan will be submitted to LADOT for review and approval.

The bulk of the work will be conducted on site. However, if temporary lane closures were needed it would require Street Services approval.

Existing access for the site would be maintained for construction access.

Deliveries of construction material will be coordinated to non-peak travel periods, to the extent possible.

b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

No Impact.

The Los Angeles County Congestion Management Program (CMP) was adopted to monitor regional traffic growth and related transportation improvements. The CMP designated a transportation network including all state highways and some arterials within the County to be

monitored by local jurisdictions. If LOS standards deteriorate on the CMP network, then local jurisdictions must prepare a deficiency plan to be in conformance with the program. Local jurisdictions found to be in nonconformance with the CMP risk the loss of state gas tax funding.

Based on the nominal level of net new project-related traffic, the Project will not produce significant impacts at any of the intersections or streets in the project vicinity.[139]

c) Would the project 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?

No Impact.

This question would apply to the Project only if it were an aviation-related use. The Project Site does not contain any aviation-related uses and the Project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the Project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact.

A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. The Project will ensure that sight distance at the Project access shall comply with standard California Department of Transportation and City of Los Angeles sight distance standards.

Roadway Changes

A review of the City's current roadway design standards indicates that no roadway widenings or right-of-way dedications are anticipated to be required along any of the project-fronting streets, including Old Santa Susana Pass Road, Calle Milagros, or Farralone Street. Additionally, since the southern portion of Bee Canyon Road will be replaced by the new project access roadway, and the northern portion of Bee Canyon Road (which will be unaffected by the Project) is a private street, no new dedications or roadway improvements are required for that facility.

Temporary impacts to pedestrian safety could occur during construction as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. The

[139] Trip Generation Assessment, Hirsch/Green, August 2017.

Project shall comply with LAMC Section 62.45 (Materials or Equipment in Streets – Permits, Regulations, Fees) and LAMC Section 91.3306 (Protection of Pedestrians). This will ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. Therefore, construction impacts would be less than significant.

Project Site Access and Internal Circulation

Primary vehicular access for the Project will be provided via a new private roadway that will intersect with Old Santa Susana Pass Road approximately 300 feet north of Calle Milagros. This new roadway will continue westward into the eastern portion of the Project Site (generally between Old Santa Susana Pass Road and the Santa Susana Wash flood control channel) to provide internal site access to Lots 1 through 19 of the Project as well as the non-project single-family residential development located south of the Project Site. Note that an existing private street, Bee Canyon Road, currently runs north-south through a portion of this part of the Project Site, connecting to Calle Milagros and providing access to two of the existing on-site residences, as well as to other existing lots located to the north and west of the Project Site. The Project's proposed new site-access and internal circulation roadway will include a portion of Bee Canyon Road (within the Project Site), which will provide a link between the new project roadway and Calle Milagros. Access to the existing (non-project) residences and lots located to the north and west of the Project Site will be maintained via a connection between Bee Canyon Road and the new project roadway, while access to the (non-project) residential development located to the south of Calle Milagros will also be available via the new project roadway and Bee Canyon Road.

Access to Lot 19 will be provided via a proposed bridge over the Santa Susana Wash flood control channel.

Although vehicular access control gates are not currently proposed for the Project, an evaluation of gated entry and exit operations at the new project roadway and exit-only operations at the Calle Milagros connections to Old Santa Susana Pass Road was conducted in the event that such controls may be desired in the future to provide enhanced security for the site's residents. Should the new project roadway be gate controlled at Old Santa Susana Road, it is anticipated that the gates would operate via card keys or transponders that automatically open the gates for vehicles so equipped (such as project residents) and/or provide a drive-up "call box" for visitors to request entry to the Project Site. Adequate maneuvering area between the "call box" and the entry gate would be provided in order to allow visitor vehicles to turn around in order to exit the site access driveway if they are denied entry through the access gate. It is also anticipated that the new project roadway would provide "full access" (left-turn and right-turn) capabilities into and out of the Project Site for both directions of travel along Old Santa Susana Pass Road, while the project's secondary access point at Calle Milagros and Old Santa Susana Pass Road would operate as an "exit only" location (allowing both left-turn and right-turns for the exiting vehicles).

Typical card key or transponder-activated gate mechanisms generally exhibit entry capacities of up to about 400 vehicles per hour per lane; the new project access roadway is expected to provide a single entry (and single exit) lane, and as such, any access control gate at this location would therefore be expected to accommodate up to about 400 vehicles per hour.

Similarly, driveways equipped with sensor-activated gate controls typically exhibit exit capacities of up to approximately 400 vehicles per hour per lane. However, while the physical operations of the gate mechanisms have some bearing on overall driveway exit capacities, the amount of exiting traffic that can be accommodated by a driveway during any particular time period is more dependent on the traffic volumes and congestion levels on the street accessed by the driveway, as these factors generally control the number of vehicles that can actually exit the driveway and enter the traffic flow (in either direction) on the fronting street. A review of the current conditions in the vicinity of the Project indicate that the traffic volumes and congestion levels along Old Santa Susanna Pass Road are relatively low, and as a result, the gates at each location are expected to exhibit exit capacities of about 400 vehicles per hour.

It should be noted that the trip "credits" used to account for the removal of the traffic associated with the two existing on-site residences (to be removed) are not applicable to the calculation of a project's driveway trips, since the driveways need to be designed to accommodate all of the project's anticipated traffic, not just the "net new" site-related trips associated with the project. Specifically, the total "driveway" trips for the Project would include the trips associated with both the 19 new single-family residences and the one existing residence that will remain. Therefore, the total Project Site access traffic volumes are expected to be approximately 191 trips per day, including 15 trips (3 inbound, 12 outbound) during the AM peak hour and 20 total trips (13 inbound, 7 outbound) during the PM peak hour.

As such, should the project applicant elect to install vehicular access control gates at the new project roadway and Calle Milagros driveways (both intersecting with Old Santa Susana Pass Road), the vehicular demands at either location during both the AM and PM peak periods will be substantially below the driveway capacities described previously, and no significant access-related issues are anticipated. It is also of note that the project's "exiting" volumes will likely be divided between the new project roadway and Calle Milagros driveways, further reducing the vehicular demands at either driveway.

Therefore, the project's proposed vehicular site access and internal circulation scheme is typical of single-family residential developments, and is expected to operate acceptably under either the currently-proposed "no gated access" or potential future "with gated access" scenarios. Additionally, access to the existing residential developments surrounding the Project Site will be maintained, and due to the project's anticipated low trip generation levels, no significant impacts to the operations of any of the existing streets and highways in the project vicinity are expected.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact.

A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The Project will not result in inadequate emergency access to the Project Site or surrounding area because no intersections would be significantly impacted due to the Project. Access, including driveway widths and aisles, would comply with LAMC and Fire Code access requirements. If vehicle gates are included, they would comply with LAFD requirements for access including knox box compliance. Impacts related to emergency access would be less than significant.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact.

A significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Public Transit Services

The Project does not propose the modification of existing alternative transportation facilities and no impact would occur.

Bicycle Services

Each residential unit will provide an on-site garage or other area for storage of the bicycles, and as such, no significant bicycle-parking related impacts are anticipated.

Pedestrian Facilities

The Project does not propose the modification of existing pedestrian facilities and no impact would occur.

17. TRIBAL CULTURAL RESOURCES

This section is based, in part, on the following item, included as Appendix D-1 of this IS/MND:

D-1 Phase I Cultural Resources Inventory, Psomas, May 2018.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant Impact with Mitigation.

A significant effect would be if the project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources section 5020.1(k). Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to tribal cultural resources, as defined in Public Resources Code section 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The proposed project is the subdivision of an 11.92 acre site and in-fill development of 19 single family homes on a site previously used for agriculture and residential with approximately 12,800 cubic yards graded and 5,200 cubic yards exported. The City sent a records request to the Native American Heritage Commission (NAHC) on August 22, 2016. The NAHC responded on August 26, 2016 informing the City that the results of the search were negative and provided a list of Native American Tribes who may be able to provide additional information regarding potential tribal cultural resources. On September 8, 2017, an informational letter pursuant to AB 52 was mailed to a total of ten tribes describing the project and requesting any information regarding resources that may exist on or near the site.

On September 22, 2017 a letter requesting consultation was received from the Gabrieleño Band of Mission Indians via email, and on September 22, 2017 the City responded to the Tribe acknowledging the request for consultation. On October 11, 2017 a consultation meeting was held via phone call and was attended by Department of City Planning staff and Tribe members from the Gabrieleño Band of Mission Indians. During the consultation, the Tribe presented

evidence from various sources identifying areas near the project site as having a higher probability of containing tribal cultural resources. During the consultation, the City directed the Tribe to provide any follow up materials the tribe would like included in the case file. On October 11, 2017 the City received an email from the tribe regarding the Governor's Office of Planning and Research's AB 52 Technical Advisory which verifies that oral history can be utilized as evidence that may support the finding of a tribal cultural resource. As of May 2018, no additional evidence has been provided to the City. On May 1, 2018, the City provided a letter to the Gabrieleño Band of Mission Indians and notifying them that based on the information provided during the consultation, it has been determined that there could be an impact to tribal cultural resources if mitigation measures were not applied. As such, the project shall be required to implement **Mitigation-Measure MM-Tribal-1** to mitigate any potential impacts to tribal cultural resources and consultation was concluded.

On November 7, 2017 the City received a consultation request from the Fernandeño Tataviam Band of Mission Indians. The deadline to request formal tribal consultation pursuant to AB 52 for the proposed project was October 10, 2017. As such, the time period to request formal consultation had expired. However, the Tribe still requested to submit evidence of the cultural significance and sensitivity of the project site for the City's evaluation of project impacts. On November 30, 2017 information and comments regarding the site's tribal cultural significance were provided via email to the City and the transmittal was confirmed by City staff. On May 1, 2018, the Tribe was provided a letter notifying them of the City's mitigation measure.

In December 2017, a Phase I Cultural Resources Inventory was prepared by Psomas for the project site. The report identified 18 prior cultural resources technical studies within a half mile of the project site and three academic overview studies. Several prehistoric sites consisting of habitation sites, lithic scatters, and ceremonial sites (rock art and burials) have been identified within a half-mile of the project site; however, none of these archaeological sites are within the project site and will not be affected from project related activities. The impact analysis of tribal cultural resources notes that the NAHC results of Sacred Lands File search were negative for cultural resources considered important to Native Americans, but the absence of site-specific information in these files does not indicate the absence of tribal cultural resources. There is a possibility that undiscovered intact cultural resources, including tribal cultural resources, could be present below the surface in native sediments and may be subject to direct impact that could be mitigated. The report recommends having a tribal monitor present to observe all ground disturbance activities during construction on site to reduce impact to a less than significant level.

Therefore, based on the information available to the City and in consideration of the concerns from the Tribe, the project shall be required to comply with **Mitigation Measure MM-Tribal-1** to ensure that project-level and cumulative impacts related to tribal cultural resources are less than significant.

Mitigation Measure

MM-Tribal-1 Prior to commencing any ground disturbance activities including excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling,

removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site, the Applicant, or its successor, shall retain and pay for archeological monitors, determined by the City's Office of Historic Resources to be qualified to identify subsurface tribal cultural resources. The archeological monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological monitor shall be assigned to each location where the ground disturbance activities are occurring.

Prior to the commencement of any ground disturbance activities at the project site, the Applicant, or its successor, shall notify any California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project that ground disturbance activities are about to commence and invite the tribes to observe the ground disturbance activities, if the tribes wish to monitor.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by the qualified archeologist, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning, Office of Historic Resources.

2. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the Applicant, or its successor, reasonably concludes that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize

impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by a qualified archaeologist and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File. 9. Notwithstanding paragraph 8 above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and shall comply with the City's AB 52 Confidentiality Protocols.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision

(c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact with Mitigation.

A significant impact would occur if the project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code section 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The proposed project is the subdivision of an 11.92 acre site and in-fill development of 19 single family homes on a site previously used for agriculture and residential with approximately 12,800 cubic yards graded and 5,200 cubic yards exported. The City sent a records request to the Native American Heritage Commission (NAHC) on August 22, 2016. The NAHC responded on August 26, 2016 informing the City that the results of the search were negative and provided a list of Native American Tribes who may be able to provide additional information regarding potential tribal cultural resources. On September 8, 2017, an informational letter pursuant to AB 52 was mailed to a total of ten tribes describing the project and requesting any information regarding resources that may exist on or near the site.

On September 22, 2017 a letter requesting consultation was received from the Gabrieleño Band of Mission Indians via email, and on September 22, 2017 the City responded to the Tribe acknowledging the request for consultation. On October 11, 2017 a consultation meeting was held via phone call and was attended by Department of City Planning staff and Tribe members from the Gabrieleño Band of Mission Indians. During the consultation, the Tribe presented evidence from various sources identifying areas near the project site as having a higher probability of containing tribal cultural resources. During the consultation, the City directed the Tribe to provide any follow up materials the tribe would like included in the case file. On October 11, 2017 the City received an email from the tribe regarding the Governor's Office of Planning and Research's AB 52 Technical Advisory which verifies that oral history can be utilized as evidence that may support the finding of a tribal cultural resource. As of May 2018, no additional evidence has been provided to the City. On May 1, 2018, the City provided a letter to the Gabrieleño Band of Mission Indians and notifying them that based on the information provided during the consultation, it has been determined that there could be an impact to tribal cultural resources if mitigation measures were not applied. As such, the project will be required to

implement **Mitigation-Measure MM-Tribal-1** to mitigate any potential impacts to tribal cultural resources and consultation was concluded.

On November 7, 2017 the City received a consultation request from the Fernandeño Tataviam Band of Mission Indians. The deadline to request formal tribal consultation pursuant to AB 52 for the proposed project was October 10, 2017. As such, the time period to request formal consultation had expired. However, the Tribe still requested to submit evidence of the cultural significance and sensitivity of the project site for the City's evaluation of project impacts. On November 30, 2017 information and comments regarding the site's tribal cultural significance were provided via email to the City and the transmittal was confirmed by City staff. On May 1, 2018, the Tribe was provided a letter notifying them of the City's mitigation measure.

In May 2018, a Phase I Cultural Resources Inventory was prepared by Psomas for the project site. The report identified 18 prior cultural resources technical studies within a half mile of the project site and three academic overview studies. Several prehistoric sites consisting of habitation sites, lithic scatters, and ceremonial sites (rock art and burials) have been identified within a half mile of the project site; however, none of these archaeological sites are within the project site and will not be affected from project related activities. The impact analysis of tribal cultural resources notes that the NAHC results of Sacred Lands File search were negative for cultural resources considered important to Native Americans, but the absence of site specific information in these files does not indicate the absence of tribal cultural resources. There is a possibility that undiscovered intact cultural resources, including tribal cultural resources, could be present below the surface in native sediments and may be subject to direct impact that could be mitigated. The report recommends having a tribal monitor present to observe all ground disturbance activities during construction on site to reduce impact to a less than significant level.

Therefore, based on the information available to the City and in consideration of the concerns from the Tribe, the project shall be required to comply with **Mitigation Measure- MM-Tribal-1** in order to ensure that project-level and cumulative impacts related to tribal cultural resources are less than significant.

18. UTILITIES AND SERVICE SYSTEMS

This section is based, in part, on the following item, included as Appendix J of this IS/MND:

J LADWP Will Serve, December 5, 2016.

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact.

A significant impact may occur if a project would discharge wastewater whose content exceeds the regulatory limits established by the governing agency. The Los Angeles Water Quality Control Board (LAWQCB) implements programs to protect all waters in the coastal watersheds for Los Angeles and Ventura counties. LAWQCB's Water Quality Control Plan for the Los Angeles Region (the Basin Plan) establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.[140] Wastewater reclamation and treatment in the City is provided by the City of Los Angeles Department of Public Works' Bureau of Sanitation (LABS), which operates two treatment plants (Hyperion and Terminal Island) and two water reclamation plants in accordance with the treatment requirements of the LAWQCB and/or water reclamation requirements of the Basin Plan.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP)[141], which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment,[142] and currently treats an average daily flow of approximately 362 mgd.[143] Thus, there is a remaining capacity of approximately 88 mgd. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LAWQCB's discharge policies for Santa Monica Bay. Additionally, the City's Sewer Allocation Ordinance (Ordinance No. 166,060) limits the annual increase in wastewater flow to HTP to five mgd.[144] This allocation allowance is monitored by the HTP and the Project's contribution would not affect the amount. Further, the HTP is a public facility and is, therefore, subject to the state's wastewater treatment requirements. The Project's wastewater discharge would be typical for a residential development. Therefore, the Project would have a less than significant impact with regard to wastewater treatment.

b) Would the project 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?

Less Than Significant Impact.

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140 Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region (4)(adopted June, 1994, updated July 2006).

141 LA Sewers: http://www.lasewers.org/treatment_plants/about/index.htm.

142 Los Angeles Sanitation: http://www.lacitysan.org/irp/Wastewater.htm.

143 LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: http://www.lacitysan.org/wastewater/factsfigures.htm.

144 Los Angeles City Clerk, Ordinance 166,060: http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=87-2121.

A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

The Project shall implement all applicable mandatory measures of the:

- 2016 California Plumbing Code, effective January 1, 2017;
- 2016 California Green Building Code (CALGreen), effective Jan. 1, 2017;
- 2017 Los Angeles Plumbing Code, effective January 1, 2017;
- 2017 Los Angeles Green Building Code, effective January 1, 2017;
- State Senate Bill SB 407, effective January 1, 2014;
- City of Los Angeles Ordinance No. 184,248 (titled, Green Building Codes Revision, Greywater Systems, Water Conservation Measures), effective June 6, 2016;
- City of Los Angeles Ordinance No. 180,822 (titled, Water Efficiency Requirements), effective December 1, 2009 and October 1, 2010; and
- City of Los Angeles Ordinance No. 172,075 (titled, Retrofit on Resale), effective 1988 and amended 1998.
- City of Los Angeles Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- City of Los Angeles Ordinance No. 181,899 (Low Impact Development) and implement Best Management Practices that have stormwater recharge or reuse benefits for the Project (as applicable and feasible).

Wastewater Generation, Treatment Facilities, and Existing Infrastructure

As shown on **Table 3.18-1, Project Estimated Wastewater Generation**, it is estimated the Project will generate a total of approximately 5,225 gallons per day (gpd) (or 0.052 mgd) of wastewater. This total does not take any credit for the proposed sustainable and water conservation features of the Project nor does it reflect the net increase since no credit is taken for existing uses, which would be removed. This is a worse-case, conservative approach.

Table 3.18-1
Project Estimated Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Proposed New Uses			
Residential	19 units	275 gallons / unit	5,225
		Total Proposed	**5,225**
Note: sf = square feet; gpd = gallons per day Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors. Assuming >3 bedroom single family rates. Table: CAJA Environmental Services, November 2018.			

Sanitary sewer service will be provided by the City of Los Angeles for lots 1 through 18. A sewer line serving lots 1 through 9 will be constructed in proposed A Street and connect to an existing sewer line in Bee Canyon Road. Lots 10 through 13 are anticipated to have lateral connections constructed to the existing sewer line located in Calle Milagros. Lots 14 through 18 will either have lateral connections to the existing sewer line located in Bee Canyon Road, or alternatively, a new parallel sewer line will be constructed in Bee Canyon Road to serve lots 14 through 18. Lot 19 will not connect to a sewer line and will utilize a private septic system.

All lots except Lot 19 would be served by a wastewater collection, conveyance, and treatment system operated by the City. Lot 19 would have an onsite wastewater treatment system (OWTS), also called septic or private sewer system). It would have properly installed and operating backwater valves. The OWTS can be either a septic system with cesspool or septic system with drain field. The State Water Resources Control Board has responsibility for regulating OWTS and protecting groundwater resources. However, LA Sanitation's OWTS group works to ensure protection of the City's surface water and groundwater resources. This is done to ensure that OWTS are meeting water quality and construction standards for maintaining the City's environmental and public health needs. LA Sanitation's OWTS group facilitates the permitting process for homeowners and operators that need permits for new construction of OWTS. LA Sanitation works with the Bureau of Engineering, Watershed Protection Division, Department of Building and Safety, and the Regional Water Quality Control Board.[145] Therefore, a less than significant impact related to alternative wastewater disposal systems would occur.

As part of the building permit process the lead agency would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project's wastewater flows. The standard procedure is that further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity (see **Project Design Feature PDF-Utilities-1**). Construction of these connection lines would not cause a significant environmental effect. A

[145] https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-ssps?_adf.ctrl-state=nvisvzg88_4&_afrLoop=13151823664984153#!

final approval for sewer capacity and connection permit will be made at that time. Therefore, Project's impacts to the wastewater conveyance system will be less than significant.

The wastewater generated by the Project will be similar to other uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system, which is designed to treat 450 mgd and which currently treats an average daily flow of approximately 362 mgd.[146] Thus, there is a remaining capacity of approximately 88 mgd. The increase in wastewater generation by the Project represents approximately 0.05% of the remaining capacity[147], and would not have a significant impact on treatment plant capacity. As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts with regard to wastewater treatment requirements will be less than significant.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) will be implemented as part of the Project and will help reduce the amount of project-generated wastewater.

Water Consumption and Treatment Facilities

The City of Los Angeles Department of Water and Power (LADWP), which provides municipal water services to the City, is responsible for providing water to the Project Site. Using the water demand rates and methodology described in the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates (2012), the proposed water demand estimate is shown in **Table 3.18-2, Estimated Future Water Demand**.

The proposed development land uses will conform to Water-Efficiency Requirements Ordinance No. 180822, 2013 California Plumbing Code, 2016 California Green Building Code (CALGreen), 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code.

As shown on **Table 3.18-2, Project Estimated Water Consumption**, it is estimated the Project will consume a total of approximately 5,225 gallons per day (gpd) (or 0.052 mgd or 5.9 acre-feet per year[148]) of water. This total does not take any credit for the proposed sustainable and water conservation features of the Project nor does it reflect the net increase since no credit is taken for existing uses, which will be removed. This is a worse-case, conservative approach.

[146] LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: http://www.lacitysan.org/wastewater/factsfigures.htm.

[147] 0.052 mgd / 88 mgd x 100% = 0.05%.

[148] 1 acre foot = 325,851.429 US gallons.

Table 3.18-2
Project Estimated Water Demand

Land Use	Size	Water Demand Rates	Total (gpd)
Proposed New Uses			
Residential	19 units	275 gallons / unit	5,225
		Total Proposed	**5,225**
Note: sf = square feet; gpd = gallons per day Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors. Assuming >3 bedroom single family rates. Table: CAJA Environmental Services, November 2018.			

It is anticipated that private water lines will be constructed to serve all lots with points of connection to existing water lines located in Old Santa Susana Road and Farralone Avenue.

LADWP indicated that the tract can be supplied with water from the municipal system subject to LADWP's Water System Rules and requirements of the Will Serve Letter.[149] Upon compliance with the conditions and requirements, the LADWP's Water Services Organization (WSO) will provide the necessary clearances to the Bureau of Engineering after receiving the final tract map.

The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the Project, and will contact the WSO at the LADWP to order a Service Availability Request (SAR). This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of LAAFP is 600 mgd with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season. The Project's water consumption increase represents approximately 0.05 percent and 0.02 percent of the remaining capacity currently available at LAAFP during the summer and non-summer months, respectively. Therefore, impacts to water treatment facilities and existing infrastructure would be less than significant. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant would be required to fund the required upgrades to adequately serve the Project as required by **Project Design Feature PDF-Utilities-2**. Therefore, Project's impacts to the water conveyance system will be less than significant.

Project Design Features

[149] LADWP Will Serve, December 5, 2016

PDF-Utilties-1 Wastewater Service

Prior to the development of a new building, the capacity of the on-site sanitary sewers that would serve the building shall be evaluated based on applicable Bureau of Sanitation and California Plumbing Code standards and replacement or new sanitary sewers shall be installed on-site as necessary to accommodate proposed flows.

As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project's wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. If street closures for construction are required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety.

PDF-Utilities-2 Water Service

New on-site water mains and laterals would be installed in accordance with City Plumbing Code requirements, where necessary, to distribute water within the Project Site.

As part of the building permit process, the Project Applicant shall confirm with the LADWP Water Service Organization (WSO) that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. If the water infrastructure has insufficient capacity, then the Project Applicant shall be required to build water lines to a point in the system with sufficient capacity. If street closures for construction are required, the Project applicant shall coordinate with LADOT on a traffic control plan.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact.

A significant impact may occur if the volume of storm water runoff increases to a level exceeding the capacity of the storm drain system serving a project or if a project would substantially increase the probability that polluted runoff would reach the storm drain system. The Project Site is located in an urbanized area of the City. Impacts to water quality would be reduced from current conditions since the Project would be required to comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles, SWRC, and Low Impact Development requirements. The Project would be required to implement stormwater

control measures during its construction phase. Any construction during the rainy season (between October 1 and April 15) would implement a Wet Weather Erosion Control Plan. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the Project to minimize the off-site conveyance of pollutants. Therefore, impacts will be less than significant.

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact.

A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs through the year 2040, according to LADWP's2015 Urban Water Management Plan (UWMP).

Water Supply Assessment (WSA)

State CEQA Guidelines Section 15083.5 requires a lead agency to identify water systems to provide WSAs for projects over specified thresholds. For any residential subdivision project Senate Bill (SB) 221 requires that the lead agency include a requirement that a sufficient water supply shall be available to serve the residential development. SB 610 requires a WSA to evaluate whether total projected water supplies will meet the projected water demand for certain development projects that are otherwise subject to CEQA review. Existing law identified those certain development projects as follows:

(a) Residential developments of more than 500 dwelling units;

(b) Shopping centers or businesses employing more than 1,000 persons or having more than 500,000 square feet of floor space;

(c) Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet;

(d) Hotels or motels with more than 500 rooms;

(e) Industrial or manufacturing establishments housing more than 1,000 persons or having more than 650,000 square feet of 40 acres;

(f) Mixed use projects containing any of the foregoing; or

(g) Any other project that would have a water demand at least equal to a 500-dwelling unit project.

Since the Project does not meet any of the criteria, a WSA is not required.

Drought Conditions

On January 17, 2014, Governor Jerry Brown officially declared California in a drought emergency. LADWP has activated the Water Conservation Response Unit in order to implement the mandatory Emergency Water Conservation Plan Ordinance – Phase 2. This includes an odd/even numbered address watering calendar. In addition, customers cannot: 1) Use water on hard surfaces such as sidewalks, walkways, driveways, or parking areas (with exception of water brooms); 2) Irrigate landscaping between the hours of 9 a.m. and 4 p.m.; 3) Allow excess water from sprinklers to flood gutters; 4) Use water to clean, fill, or maintain decorative fountains unless the water is part of a recirculation system; 5) Serve water to customers in eating establishments, unless requested; and 6) Allow irrigation leaks to go unattended.[150] The 2015 UWMP takes into account drought conditions. After adjusting for economy and drought conditions, projected water demands can vary by approximately ± 5 percent in any given year due to average historical weather variability. This means that water demands under cool/wet weather conditions could be as much as 5 percent lower than normal demands on average; while water demands under hot/dry weather conditions could be as much as 5 percent higher than normal demands on average.[151]

On April 1, 2015, Governor Brown signed Executive Order B-29-15, which provides actions that will save water, increase enforcement to prevent wasteful water use, streamline the state's drought response, and invest in new technologies to make California more drought resilient. The Executive Order provides water savings by directing the State Water Resources Control Board to implement mandatory water reductions in cities and towns to reduce water usage by 25% or approximately 1.5 million acre-feet. The Executive Order calls for local water agencies to implement conservation pricing to discourage water waste.[152] State mandated conservation and reductions are implemented by LADWP.

On April 7, 2017, Governor Brown signed Executive Order B-40-17, which ended the drought state of emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne, where emergency drinking water projects will continue to help address diminished groundwater supplies. It maintains water reporting requirements and prohibitions on wasteful practices.[153]

The 2015 UWMP was adopted in June 2016 and projects a demand of 611,800 AFY in 2020 and 644,700,000 AFY in 2025.[154] The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multifamily, commercial/government, industrial), then

[150] LADWP, Drought Information: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation/a-w-c-droughtbusters?_adf.ctrl-state=nviecbhak_4&_afrLoop=932704326968157.
[151] 2015 Urban Water Management Plan, Los Angeles, pg. ES-12, August 26, 2017.
[152] California Governor: http://gov.ca.gov/news.php?id=18910, August 26, 2017.
[153] http://www.water.ca.gov/waterconditions/declaration.cfm
[154] 2015 Urban Water Management Plan, Los Angeles, pg. ES-23.

adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG 2012 RTP.[155] The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).[156] Neither the UWMP forecasts, nor the 2012 RTP include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. Therefore, impacts related to the project's water demand would be less than significant.

e) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact.

A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As previously discussed, the Project's generation of 0.052 mgd of wastewater would be sufficiently accommodated as part of the remaining 88 mgd of treatment capacity currently available at HTP. Therefore, impacts to wastewater treatment would be less than significant.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact.

A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. 43 percent of the waste generated in the City is disposed of at the Sunshine Canyon City/County Landfill, 20 percent at the Chiquita Canyon Landfill, and the remaining amounts sent to over a dozen other landfills, recycling, refuse-to-energy, or resource recovery facilities.[157]

Facilities

The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day (tpd) and accepted an average of 7,582 tpd (2014 daily average).[158] It is expected to close in 2037.[159] It has a remaining daily intake availability of 4,993 tpd, and has approximately 96.8 million cubic yards

[155] 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.
[156] SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.
[157] City of Los Angeles, Fact Sheet: Solid Waste Facilities: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf.
[158] County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: http://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, April 11, 2016.
[159] 23 years remaining life as of 2014 Annual Report, prepared in December 2015.

(cy) of remaining capacity out of a total capacity of 140.9 million cy.[160] As of September 30, 2013, Sunshine Canyon Landfill accepted approximately 7,800 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).[161] Space is calculated by volume, with 1.7 cubic yards equaling one ton of trash. Projections of capacity are tied to how tightly the trash is compacted.[162] Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 4,300 tpd during each weekday and 9,100 tpd on Saturday.

There are two solid waste transformation facilities within Los Angeles County. The Commerce Refuse-to-Energy Facility has a permitted intake 1,000 tpd and accepted an average of 337 tpd (2013 daily average). It has a remaining daily intake availability of 663 tpd.[163] The Southeast Resource Recovery Facility, located in the City of Long Beach, has a permitted intake 2,240 tpd and accepted an average of 1,504 tpd (2013 daily average). It has a remaining daily intake availability of 736 tpd.[164] It is expected that these two facilities will continue to operate at their current permitted capacities through the planning period of 2022. The owners and operators of these facilities have indicated that there are no plans to increase the daily capacity.

The County is exploring the use of conversion technologies to reduce future disposal needs as well as address global climate change. These technologies encompass a variety of processes that convert normal household trash into renewable energy, biofuels, and other useful products. The County has launched the Southern California Conversion Technology Demonstration Project, which seeks to promote, evaluate, and establish a demonstration facility for the conversion of solid waste into clean energy.[165] Additionally, the County recently completed its final Phase II Conversion Technology Evaluation Report, which provides a comprehensive study of existing technology suppliers and materials recovery facilities throughout southern California.

The Puente Hills Materials Recovery Facility (MRF) accepts all kinds of waste for recycling and disposal, including commercial, construction/demolition, and residential wastes. The Puente Hills MRF is permitted to accept 4,400 tons per day and 24,000 tons per week of municipal solid waste.[166] In 2016, the Puente Hills Intermodal Facility provides a Materials Recovery Facility/Transfer Station for the Waste-by-Rails system to the Mesquite Regional Landfill in Imperial County.[167] The Mesquite Landfill can accept 20,000 tons per day, with an overall capacity of 600 million tons and a lifespan of 100 years.[168]

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160 State of California Department of Resources Recycling and Recovery, Solid Waste Facility Listing/Details Page, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000), website: http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail, accessed November 19, 2016.

161 Sunshine Canyon Landfill Newsletter, Fall 2013 (latest newsletter), website: http://www.sunshinecanyonlandfill.com/home/newsletter/fall_2013_newsletter.pdf, accessed November 19, 2016.

162 Sunshine Canyon: http://www.sunshinecanyonlandfill.com/home/Future.html, November 19, 2016.

163 County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: http://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, April 11, 2016.

164 County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: http://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, April 11, 2016.

165 Los Angeles County Phase II Conversion Technology Evaluation Report - October 2007, http://www.socalconversion.org/pdfs/LACo_Conversion_PII_Report.pdf, October 8, 2014.

166 LA County Sanitation Districts, PHMRF: http://www.lacsd.org/solidwaste/swfacilities/mrts/phmrf/phmrffactsheet.asp

167 LA County Sanitation Districts, Waste-by-rail: http://www.lacsd.org/solidwaste/wbr/default.asp

168 Mesquite Regional Landfill, Site Information: http://www.mrlf.org/index.php?pid=5

Construction

Construction of the Project will generate construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged. Materials not recycled would be disposed of at local landfills.

Construction of the approximately 90,000 square feet of new floor area would generate approximately 197 tons of construction waste.[169] Construction would take approximately 330 days. Therefore, Project construction would generate approximately 0.60 tons per day of construction waste on average throughout the various construction phase.[170] Compliance with AB 939 would require a minimum of 50 percent of demolition and construction debris to be recycled. Therefore, construction impacts to landfills and solid waste services will be less than significant.

Operation

As shown on **Table 3.18-3, Project Estimated Solid Waste Generation**, it is estimated the Project will generate a total of approximately 357 pounds per day (or 0.18 tons per day) of solid waste. It does not reflect the net increase since no credit is taken for existing uses, which will be removed. This is a worse-case, conservative approach.

Table 3.18-3
Project Estimated Solid Waste Generation

Land Use	Size	Solid Waste Generation Rates	Total (pounds)
Proposed New Uses			
Residential	76 residents	4.7 pounds / resident	357
		Total Proposed	**376**
http://www.calrecycle.ca.gov/LGcentral/GoalMeasure/DisposalRate/MostRecent/default.htm Table: CAJA Environmental Services, November 2018.			

The Sunshine Canyon Landfill has a remaining daily intake availability of 4,993 tpd and could therefore accommodate the additional approximately 0.18 tons per day increase in solid waste resulting from the Project. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. The City had an accelerated goal of 75 percent by 2013. During fiscal 2013-14, the

[169] Based on 4.02 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-2, page A-1).

[170] 197 / 330 days = 0.60 tons per day.

City exceeded the mandated 75 percent diversion rate goal, achieving 76.4 percent,[171] with the goal to achieve a 90 percent diversion by 2025.[172]

In compliance with the LAMC, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation. Therefore, the impact associated with solid waste during operation of the Project would be less than significant.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact.

A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated on-site by the Project will be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of Project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Integrated Resources Plan, which is the long-range solid waste management policy plan for the City through 2025, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills.

The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction, and the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials. Waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Sunshine Canyon Landfill has adequate capacity to accept the Project's waste through its slated to closure date of 2037. The Waste-By-Rails program to the Mesquite Landfill, located in southeastern Imperial County, CA, would have adequate capacity and is slated to operate for 100 years. The Project would comply with federal, state, and local regulations, and as such, impacts would be less than significant.

[171] City of Los Angeles, Department of Public Works, Annual Report, 2013-14: http://bpw.lacity.org/DPW-2013-14-ANNUAL-REPORT.pdf, April 11, 2016.

[172] City of Los Angeles, Department of Public Works, A Five-Year Strategic Plan, Fiscal Years 2013/14-2017/18: http://www.lacitysan.org/general_info/pdfs/Strategic_Plan2013-14.pdf, accessed January 5, 2017.

ENERGY ANALYSIS

Regulatory Framework

Federal Regulations

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.[173]

State Building Energy Efficiency Standards

The Building Energy Efficiency Standards (Title 24 Part 6) were first adopted in 1976 and have been updated periodically since then as directed by statute. The Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code Sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the Energy Commission to establish performance standards, in the form of an "energy budget" in terms of the energy consumption per square foot of floor space. For this reason, the Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference Appendices are adopted along with the Standards that contain data and other information that helps builders comply with the Standards.

The 2016 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential Standards include alignment with the American Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) 90.1 2013 national standards. New efficiency requirements for elevators and direct digital controls are included in the nonresidential Standards. The 2016 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. The building efficiency standards are enforced through the local building or individual agency permit and approval processes.[174]

[173] CAFE standards: www.nhtsa.gov/fuel-economy.

[174] CalGreen: http://www.bsc.ca.gov/

California Green Building Code

Part 11 of the Title 24 California Building Standards Code is referred to as the California Green Building Standards Code, or CalGreen. The purpose of the California Green Building Standards Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." As of January 1, 2011, the California Green Building Standards Code is mandatory for all new buildings constructed in the state. The California Green Building Standards Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. The California Green Building Standards Code was most recently updated in 2016 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2017.

California Renewable Energy Resources Act

LADWP is subject to the California Renewable Energy Resources act and thus is required to commit to the use of renewable energy sources, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 mw or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and "other renewables that may be defined later".[175]

LADWP's target procurement of energy from renewable resources in 2014 is 20 percent. As of 2011, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet Project demand. With respect to on-site renewable energy sources, because of the Project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy, the use of heat naturally present in shallow soil or in groundwater or

[175] City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.

rock to provide building heating/cooling and to heat water, requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air to a building. Although methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form (i.e., a form that could be used without further treatment), and its extraction and treatment for energy purposes would result in secondary impacts; it is currently regulated as a hazardous material by the City.

The use of energy provided by alternative (i.e., renewable) resources, off-site and on-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by LADPW, the service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation.

Assembly Bill 32

Assembly Bill 32 (Health and Safety Code Sections 38500–38599; AB 32), also known as the California Global Warming Solutions Act of 2006, commits the State to achieving year 2000 GHG emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32 tasked the California Public Utilities Commission and the California Energy Commission with providing information, analysis, and recommendations to the California Air Resources Board (CARB) regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors.

Assembly Bill 1493 (AB 1493)/Pavley Regulations

AB 1493 (commonly referred to as CARB's Pavley regulations) was the first legislation to regulate GHG emissions from new passenger vehicles. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks) for model years 2009–2016. The Pavley regulations are expected to reduce GHG emissions from California's passenger vehicles by about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs. [176]

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products, or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas, and hydrogen.[177]

CARB's Advanced Clean Cars Regulation

[176] Clean Car Standards—Pavley, Assembly Bill 1493, www.energy.ca.gov/low_carbon_fuel_standard/,

[177] Low Carbon Fuel Standard: Fuels and Transportation Division Emerging Fuels and Technologies Office, www.energy.ca.gov/low_carbon_fuel_standard/

Closely associated with the Pavley regulations, the Advanced Clean Car Standards emissions-control program (ACC program) was approved by CARB in 2012. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles for model years 2017–2025. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. Additionally, environmentally superior cars will be available across the range of models (compacts, sport utility vehicles (SUVs), pickups, and minivans) and consumer savings on fuel costs will average $6,000 over the life of the car.[178]

Airborne Toxic Control Measure

The California Air Resources Board (CARB) has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))179 to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Construction workers working on the Site would be required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment.

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375 (SB 375), coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction mandates established in AB 32. SB 375 specifically requires the Metropolitan Planning Organization (MPO) to prepare a “sustainable communities strategy” (SCS) as a part of its Regional Transportation Plan (RTP) that will achieve GHG emission reduction targets set by CARB for the years 2020 and 2035 by reducing vehicle miles traveled (VMT) from light-duty vehicles through the development of more compact, complete, and efficient communities.[180]

The Project Site is located within the planning jurisdiction of the Southern California Association of Governments (SCAG). SCAG’s first-ever SCS is included in the 2012–2035 Regional

[178] California Renewables Portfolio Standard (RPS), http://www.cpuc.ca.gov/RPS_Homepage/

[179] California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf, accessed May 12, 2017.

[180] Sustainable Communities, www.arb.ca.gov/cc/sb375/sb375.htm

Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), which was adopted by SCAG in April 2012. The goals and policies of the SCS that reduce VMT (and result in corresponding decreases in transportation-related fuel consumption) focus on transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities so there is access to high quality transit service. Recently, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS).[181] The goals and policies of the Updated RTP/SCS are the same as those in the 2012–2035 RTP/SCS.

The RTP/SCS also establishes High-Quality Transit Areas (HQTA), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT.

The Project Site is located within a HQTA as designated by 2016 RTP/SCS.[182]

Senate Bill 1389

Senate Bill 1389 (Public Resources Code Sections 25300–25323; SB 1389) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. The California Energy Commission must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The most recently completed report, the 2015 Integrated Energy Policy Report, addresses a variety of issues related to energy efficiency, benchmarking under the Assembly Bill 758 Action Plan, strategies related to data for improved decisions in the Existing Buildings Energy Efficiency Action Plan, building energy efficiency standards, achieving 50 percent renewable by 2030, among other issues.[183]

2016 Final Power Integrated Resource Plan[184]

The LADWP released the 2016 Final Power Integrated Resource Plan (IRP) in December 2016, which provides a 20-year framework to ensure LADWP can meet the future energy needs of its ratepayers by forecasting demand for energy and determining how that demand will be met. The IRP is an update of the 2015 IRP, and reflects evolving environmental, regulatory, and economic developments. The 2015 IRP included a newly created and redesigned energy efficiency (EE) program to achieve at least 10 percent less customer usage of electricity by 2020; development of a new Power System Reliability Program (PSRP) to incorporate not only distribution, but also generation, transmission, and substations with a new prioritization model to improve system reliability; and plans for an agreement between Intermountain Power Agency and the Intermountain Power Project (IPP) participants to replace IPP coal-fired generation with

[181] SCAG, 2016 RTP/SCS, dated April 2016.

[182] http://scagrtpscs.net/SiteAssets/ExecutiveSummary/assets/resources/Exhibit5-1_HighQualityTransitAreaInTheSCAGregionFor2040Plan.pdf

[183] California Energy Commission, 2015 Integrated Energy Policy Report.

[184] 2016 Final Power IRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=86387266209556, accessed May 12, 2017.

new highly efficient gas-fired generators by no later than July 1, 2025, two years earlier than recommended in 2012's IRP.

The 2016 IRP incorporates updates to reflect the latest load forecast, fuel price and projected renewable price forecasts, and other modeling assumptions. Major renewable projects approved or implemented include the approval of 460 mw of large scale solar, approval of the 250 mw Beacon Solar Project, implementation of Pine Tree and Adelanto Solar, and implementation of two geothermal projects. An innovative Solar Feed-in-Tariff (FiT) Program was implemented by the Department of Energy, which consists of a FiT 100 – Set Pricing Program and a FiT 50 – Competitive Pricing Program, which bundles Beacon Solar and Local Solar. The Fit 50 - Competitive Pricing Program is an innovative program that combines both a FiT local solar agreement committing to a large block of approximately 10mw, together with a commitment to a large utility scale project of approximately 50 mw to be built by the same vendor at LADWP's Beacon Solar site.[185] This IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The overriding purpose is to provide a framework to assure the future energy needs of LADWP customers are met in a manner that balances the following key objectives: superior reliability and supply of electric service; competitive electric rates consistent with sound business principles; and responsible environmental stewardship exceeding all regulatory obligations.[186]

LADWP Rules Governing Water and Electric Service

Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[187] LADWP will provide a dependable supply of potable water, from available sources, in quantities adequate to meet the reasonable needs of its customers. The delivery of such supply will be at the Service Connection. Generally, the LADWP will maintain operating pressures at the Service Connection of not less than 25 pounds per square inch. Pressures may be lower at times of Maximum Demand or because of unusual elevations or other special conditions.

City of Los Angeles Green Building Code

The 2017 LA Green Building Code is based on the 2016 California Green Building Standards Code and commonly known as *CAL*Green as discussed above, that was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and non-residential)

[186] 2016 Final Power IRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=86387266209556, accessed May 12, 2017.

[187] LADWP Rules Governing Water and Electric Service: https://www.lacity.org/your-government/government-information/city-charter-rules-and-codes

- Alterations with building valuations over $200,000 (residential and non-residential)

Specific measures to be incorporated into the Project to the extent feasible could include, but are not limited to:

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed concrete
- sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Use of energy efficient lighting;
- Use of Energy Star appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15% of the roof area set aside for future solar panels;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping;
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to stormdrain systems; and
- Provision of electric vehicle charging stations in the parking structure; 5% of total spaces will be designated for low emitting, fuel efficient and carpool/van pool vehicles.

Los Angeles Department of Water and Power

The LADWP provides electricity to the Project Site. The LADWP provides its 1.4 million customers with more than 26 million megawatt hours (mw-h) of electricity a year.[188] LADWP serves a 465-square-mile area and is the largest municipal utility in the nation. In total, LADWP operates 20 receiving stations and 174 distribution stations and plans to acquire additional facilities as their load increases. The LADWP electricity portfolio is made up of coal (39

[188] LADWP, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=na2o8wvza_4&_afrLoop=81976737428000, June 10, 2017.

percent), natural gas (22 percent), renewables[189] (20 percent), nuclear (11 percent), unspecified sources (5 percent), and large hydroelectric (3 percent).[190]

Table 3.18-4, LADWP Electricity Capacity, shows the LADWP electricity system capacity.

Table 3.18-5, LADWP Energy Usage, shows the LADWP power usage.

Table 3.18-6, Energy Sales and Peak Demand, provides the estimated sales (consumption) by sector (residential, commercial, industrial, etc.) and peak demand over the next 10 years.

Table 3.18-4
LADWP Electricity Capacity

	Amount (megawatts)
Net Maximum Plant Capacity	7,300
Los Angeles Peak Demand	6,177
Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afrLoop=1119458526572567 Table: CAJA Environmental Services, June 2017.	

Table 3.18-5
LADWP Energy Usage

	Amount (megawatt-hours)
Residential	8.4
Commercial	12.8
Industrial	1.9
Other	0.4
Total	**23.14**
Fiscal Year 2013. Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afrLoop=1119458526572567. Table: CAJA Environmental Services, June 2017.	

Table 3.18-6
Energy Sales and Peak Demand

Year	Sector Sales (gw-h)						Peak Demand (mw)
	Residential	Commercial	Industrial	Misc.	PHEV	Total	
2017-18	8,217	13,019	1,843	305	126	23,508	5,765
2018-19	8,184	12,731	1,837	306	205	23,264	5,739
2019-20	8,166	12,506	1,829	309	288	23,098	5,707
2020-21	8,173	23,480	1,832	311	368	23,163	5,718
2021-22	8,288	12,714	1,843	314	451	23,609	5,782
2022-23	8,430	13,037	1,852	316	531	24,165	5,908
2023-24	8,568	13,306	1,850	319	610	24,653	6,006
2024-25	8,686	13,568	1,849	321	673	25,097	6,098

[189] Renewables include small hydroelectric, solar, wind, geothermal, biomass and waste.

[190] LADWP, Power Facts and Figures website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=scgxlug8o_21&_afrLoop=820632791590000&_afrWindowMode=0&_afrWindowId=na2o8wvza_1#%40%3F_afrWindowId%3Dna2o8wvza_1%26_afrLoop%3D820632791590000%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dna2o8wvza_33, June 10, 2017.

gw-h – gigawatt-hours; mw – megawatts
Misc. includes streetlighting, Owens Valley, and intra-departmental
LADWP, 2016 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=86387266209556
Table: CAJA Environmental Services June 2017.

Power and Energy

When discussing electricity, the appropriate unit of measurement depends on whether one is referring to power or energy. Power is the rate at which energy is consumed (in watts, kilowatts, or megawatts). Energy is the amount of power consumed (in watt-hours). Customers are charged based on their energy use (typically kilowatt-hours). The relationship between power and energy:

- Energy (watt-hours) = power (watts) X time (hours)

For example, a 60-watt light bulb refers to the amount of power the light consumes. If the 60-watt light bulb was on for 12 hours, it would consume 720 watt-hours (or 0.72 kilowatt-hours) of energy.

Load Factor

Load factor represents how consistent the rate of energy usage throughout a given day. A 100 percent load factor means that the same amount of power is used off peak as on peak, so the system is getting full use of its generating resources. A low load factor results in generators being started more often to serve load for a few hours a day, which is not optimum. From the 1990s through 2005, annual system load factors were trending slowly upward, which is a positive movement. Since 2006, system load factors are trending down. Some of this decline in load factor is due to the fact that much of the historic energy efficiency effort is directed at lighting, which has a higher impact on sales when compared to peak. The 2013 California Energy Commission's forecasted load factors shows that forecasted load factor will continue to decline for earlier years of the forecast, due to energy conservation; however, forecasted load factors increase in later years due to increasing electric vehicle usage.[191]

Load factor can be expressed as the ratio of the average load in kilowatts (kw) supplied at a designated period compared to the peak or maximum load in kilowatts occurring in the period. Load factor, in percent, is derived by multiplying the kilowatt-hours (kw-h) in the period by 100 and dividing by the product of the maximum demand in kilowatts and the number of hours in the period:[192]

- Load Factor (%) = (kw-h / hours / kw) X 100%

[191] LADWP, 2016 IRP, pg 47: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=86387266209556, June 10, 2017.
[192] Madison Gas and Electric, Glossary for Load Factor: http://www.mge.com/about/electric/glossary.htm#f, June 10, 2017.

- Example: Assume a 30-day billing period or 30 days X 24 hours for a total of 720 hours. Assume a customer used 10,000 kw-h and had a maximum demand of 21 kw. The customer's load factor would be 66 percent [(10,000 kw-h / 720 hours / 21 kw)*100].

Natural Gas Supply and Demand

The Southern California Gas Company (SCG) provides natural gas to the Project Site. SCG is a subsidiary of Sempra Energy and the nation's largest natural gas supplier, distributes natural gas to 19.5 million residential, commercial, and industrial customers throughout southern California, including the Project Site. SCG owns and operates 95,000 miles of gas distribution mains and service lines, gas transmission compressor stations, underground storage facilities, as well as nearly 3,000 miles of transmission and storage pipeline. The total 136.1 billion cubic feet (Bcf) of natural gas storage capacity is divided as follows: 82 Bcf is for core customers, small industrial, and commercial customers; 4 Bcf is for system balancing; and the remaining 49.1 Bcf is available to other customers.[193] Natural gas service is provided in accordance with SCG's policies and extension rules on file with the California Public Utilities Commission (PUC) at the time contractual agreements are made.

The State produces about 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the State, 62 percent from the Southwest and Rocky Mountain area, and 23 percent from Canada. In the last ten years, three new interstate gas pipelines were built to serve California, expanding the over one million miles of existing pipelines. However, the availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SCG is under the jurisdiction of the PUC, but can be affected by the actions of federal regulatory agencies. Should these agencies take any action affecting natural gas supply or the conditions under which service is available, natural gas service would be provided in accordance with those revised conditions.

The 2016 California Gas Report includes projections regarding future demand for natural gas in the Southern California region. SCG projects total gas demand to decline at an annual rate of 0.6% from 2016 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). From 2016 to 2035, residential demand is expected to decline from 239 Bcf to 218 Bcf. The decline is due to declining use per meter offsetting new meter growth. The core, non-residential markets are expected to grow from 113 Bcf in 2016 to 105 Bcf by 2035. The change reflects an annual growth rate of 0.5% over the forecast period. The noncore, non-EG markets are expected to decline from 170 Bcf in 2016 to 153 Bcf by 2035. The annual rate of decline is approximately 0.5% due to very aggressive energy efficiency goals and associated programs. On the other hand, utility gas demand for enhanced oil recovery (EOR) steaming operations, which had declined since the FERC-regulated Kern/Mojave interstate pipeline began offering direct service to California customers in 1992, has shown some growth in recent years because of continuing high oil prices and is expected to show further growth in

[193] 2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, June 10, 2017.

the early years of the forecast period. EOR demand is expected to remain at about its 2015 level through 2035 as gains are offset by the depletion of older oil fields.[194]

In 2016 gas demand for California is projected to average 6,072 million cubic feet per day (cf/day) and is projected to decrease to 4,626 million cf/day by 2035, a decline of 1.35 percent per year.[195]

Table 3.18-7, Statewide Total Supplies and Requirements, shows the anticipated statewide total supplies and requirements for natural gas for 2017 to 2030. In 2015 (the latest data available from the 2016 California Gas Report), SCG's highest winter sendout was 4,036 million cf/day and highest summer sendout was 3,601 million cf/day.[196]

In 2017, SCG retail core demand was 2,944 million cf/day. By 2019, the demand is expected to fall to 2,917 million cf./day.[197]

Table 3.18-7
Statewide Total Supplies and Requirements

	2017	2018	2019	2020	2021	2022
Utility Supply Source						
California Sources	165	165	165	165	165	165
Out-of-State	4,798	4,758	4,711	4,668	4,620	4,618
Non-Utility Served Load	1,056	985	910	813	781	691
Statewide Supply Source Total	**6,020**	**5,909**	**5,787**	**5,645**	**5,566**	**5,474**
Utility Requirements						
Residential	1,181	1,185	1,167	1,155	1,148	1,139
Commercial	485	481	478	473	470	465
Natural Gas Vehicles	48	50	52	54	57	59
Industrial	950	943	937	932	931	929
Electric Generation	1,648	1,623	1,590	1,566	1,529	1,540
Enhanced Oil Recovery Steaming	46	46	46	46	46	46
Wholesale/International Exchange	245	246	246	247	247	247
Company Use and Unaccounted-For	75	74	73	73	71	72
Non-Utility Served Load	1,056	985	910	813	781	691
Statewide Requirements Total	**5,734**	**5,623**	**5,501**	**5,360**	**5,281**	**5,188**

All measurements in million cf per day. Numbers in the table may not add up exactly due to rounding.
Average temperature and normal hydro year.
2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, June 10, 2017.
Table: CAJA Environmental Services June 2017.

The SCG demands for 2015 and 2035 are shown in **Table 3.18-8**. Demand is expected to be relatively flat (commercial) or exhibit annual declines (residential, industrial) due to modest economic growth, PUC-mandated demand-side management goals and renewable electricity goals, decline in commercial and industrial demand, and continued increased use of non-utility pipeline systems by EOR customers and savings linked to advanced metering modules.[198]

[194] 2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, June 10, 2017.
[195] 2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, June 10, 2017.
[196] 2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, June 10, 2017.
[197] 2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, June 10, 2017.
[198] 2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, June 10, 2017.

Table 3.18-8
SCG Natural Gas Demands

	2015	2035	Difference
Residential	239	218	-21
Core Commercial	81	65	-16
Non-Core Commercial	16.4	14.7	-1.7
Industrial	21.6	15.3	-6.3
All measurements in billion cf 2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, May 12, 2017. Table: CAJA Environmental Services May 2017.			

ENVIRONMENTAL IMPACTS

Thresholds of Significance

State CEQA Guidelines

Appendix F, Energy Conservation, of the CEQA Guidelines directs an EIR[199] to include the following:

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

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

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

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

(e) The effects of the project on energy resources; and

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

City of Los Angeles CEQA Thresholds Guide

As set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

(a) The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;

[199] The analysis is included in this MND for disclosure purposes.

(b) Whether and when the needed infrastructure was anticipated by adopted plans; and

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

Based on these factors a project would have a significant impact if:

- The project would result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities; or

- The design of the project fails to incorporate energy conservation measures that go beyond existing requirements.

Methodology

The SCAQMD has electricity[200] and natural gas[201] consumption rates for various land uses based on the square footage of development. Applying the SCAQMD rates to the proposed building square footages and use types, an estimate was made as to the future demand for the Project. Given the existing capacity of the Project Site's electrical and natural gas delivery system and future projected consumption and demand, an assessment was made of the Project's impacts. Appendix F of the State CEQA Guidelines further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives. In accordance with Appendix F of the State CEQA Guidelines, this section includes relevant information and analyses that address the energy implications of the Project. This section represents a summary of the Project's anticipated energy needs, impacts, and conservation measures.

Project Impacts

Construction

Petroleum-Based Fuel Demand

During Project construction, energy would be consumed in three general forms: (1) petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, as well as delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities); (2) electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance), and electricity associated with providing temporary power for lighting and electronic equipment inside temporary construction trailers and within the proposed structures; and (3) energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

[200] SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-11-A, Electricity Usage Rate.
[201] SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate.

The petroleum-based fuel use summary represents a conservative estimate of energy that would be consumed throughout the Project construction period based on maximum intensity construction assumptions. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. In addition, construction activities would be subject to compliance with applicable regulatory requirements designed to reduce the consumption of energy resources. Specifically, regulatory requirements (CCR Title 13, Section 2485) would require idling of all diesel-fueled commercial vehicles weighing over 10,000 pounds during construction to be limited to five minutes at any location.[202] Compliance with this Airborne Toxic Control Measure (ATCM) would reduce the Project's reliance on petroleum-based fuels during construction activities and the Project's consumption of petroleum-based fuels would not have an adverse impact on available supplies. In addition, with regard to trips for hauling demolition materials, the City of Los Angeles has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. The project's compliance with these regulations would reduce the number of trips and fuel required to transport construction debris, which would reduce the wasteful, inefficient, and unnecessary consumption of energy, and provide for reduced transportation-related energy usage compared to similar projects in other jurisdictions.

In 2015, California consumed a total of 342,523 barrels of gasoline for transportation, which is equivalent to a total annual consumption of 14.4 billion gallons by the transportation sector.[203] Fuel would be consumed by construction worker vehicles travelling to and from the Project Site. A study by Caltrans found that the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) is projected at 22.711 miles per gallon (mpg) and worse-case diesel trucks is 5.71 mpg in 2015.[204] Further, while construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and cease upon the completion of construction. Therefore, construction-related impacts to petroleum fuel consumption would be less than significant.

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))[205] to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be

202 CA ARB: https://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm

203 US EPA, State Energy Data System, Table F-3: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf, accessed August 26, 2017.

204 Caltrans, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF, accessed August 26, 2017.

205 California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf

phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated.

Electricity Demand

Electricity would be consumed during the conveyance of the water used during construction activities that require the use of water to control fugitive dust. Furthermore, electricity used to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structures. This electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. Similar to the use of petroleum-based fuels, electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.

Construction of the Project's electrical infrastructure would occur entirely within the Project Site with the possible need for off-site connections to facilities adjacent to the Project Site. As such, construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses, utility system capacity, or existing electrical infrastructure. The Project's on-site electrical system would consist of underground electrical lines, conduits, banks, and transformers, as needed. Where feasible, the new service installations and connections would be scheduled and implemented in a manner that would not result in electrical service interruptions to other properties. Compliance with LADWP's guidelines and requirements would ensure that the Project Applicant fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations with LADWP, and limits any impacts associated with grading, construction, and development within LADWP easements.

While it is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete, it is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. In addition, the Project would feature a sustainable design to comply with CALGreen, which would also result in the use of

sustainable materials and recycled content that would reduce energy consumption during Project construction. Thus, as compared to a similar project that utilizes more conventional materials, the Project would result in reduced indirect energy usage related to construction material production.

Therefore, the Project's on-site construction activities would not result in the wasteful, inefficient, or unnecessary use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. Furthermore, Project construction would not violate state or federal energy standards or consume a substantially greater amount of energy than other similar projects. As such, impacts would be less than significant.

Natural Gas Demand

During construction, natural gas would not typically be consumed on the Project Site. Natural gas consumed on-site would be limited to the minor amounts of natural gas released during installation, and if necessary the upgrade of the natural gas infrastructure that currently serves the Project Site. In addition, prior to operation, the Project would connect to the existing natural gas lines on the Project Site. Any extension of the existing natural gas facilities would comply with the SCG design and sizing requirements and would result in minimal amounts of natural gas being released.

Operation

Electricity Demand

As shown in **Table 3.18-9, Project Estimated Electricity Demand**, the Project would demand approximately 106,885 kw-h/year (0.107 gw-h/year) of electricity. This total does not take any credit for the proposed sustainable and energy conservation features of the Project nor does it reflect the net increase since no credit is taken for existing uses, which would be removed. This is a worse-case, conservative approach.

Table 3.18-9
Project Estimated Electricity Demand

Land Use	Size	Electricity Rates	Total (kw-h/yr)
Residential	19 units	5,626.5 kw-h / unit	106,885
		Total Proposed	**106,885**

sf =square feet; kw-h = kilowatt-hour; yr = year
Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate
The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
Table: CAJA Environmental Services, November 2018.

Electrical conduits, wiring and associated infrastructure would be conveyed to the Project from LADWP lines in the surrounding streets to the Project during construction. This analysis

compares the electricity demand for the Project to the overall LADWP capacity Citywide. The LADWP forecasts that in 2019-20, the total adjusted electricity sales (load forecast) will be 23,098 gigawatt-hours (gw-h) with residential uses consisting 8,166 gw-h and commercial uses consisting of 12,506 gw-h. The peak demand would be 5,707 megawatts (mw).[206]

Currently, the LADWP is able to supply over 7,640 mw of generation capacity with the highest recorded peak being 6,396 mw.[207] If the Project demand of 216 mw-h/year in energy were operating at full load for a full year (8,760 hours), the Project's demand would be approximately 0.02 mw of power.[208] This represents approximately 0.001 percent of the LADWP's power capacity at existing levels. Peak demand is expected to grow to 5,707 mw in 2019-2020 (project buildout).[209] Despite these growth projections, demand would still not exceed the existing capacity of 7,640 mw. Thus, there is adequate generation supply capacity to serve the Project.

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[210] It should also be noted that the Project's estimated electricity consumption is based on usage rates that do not account for the Project's energy conservation features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the Project would likely be lower than that forecasted. Based on the above analysis, no operational impacts associated with the consumption of electricity would occur.

Natural Gas Demand

As shown in **Table 3.18-10, Project Estimated Natural Gas Demand**, the Project is estimated to demand approximately a net increase of 76,219 cf/month (2,541 cf/day) of natural gas. This total represents a more conservative result since it does not take any credit for the proposed sustainable and energy conservation features of the Project, nor does it reflect the net increase since no credit is taken for existing uses, which would be removed. This is a worse-case, conservative approach.

The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the Project's energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2017 is estimated at 2,944 million cf/day and by 2019 is estimated at

206 LADWP, 2016 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=86387266209556

207 LADWP https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=12do6zwhm2_4&_afrLoop=86275907941327, accessed May 12, 2017.

208 921 / 8,760 = 0.10

209 2016 Power Integrated Resource Plan, Forecasted growth in Annual Peak Demand, accessed May 12, 2017.

210 LADWP Rules Governing Water and Electric Service: http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf.

2,917 million cf/day. The Project's natural gas demand represents approximately 0.002 percent of the 2019 peak demand. Thus, there is adequate supply capacity and no impacts would occur.

Table 3.18-10
Project Estimated Natural Gas Demand

Land Use	Size	Natural Gas Rates	Total (cf/mo)
Residential	19 units	4,011.5 cf / mo	76,219
		Total Proposed	**76,219**

sf =square feet; cf = cubic feet; mo = month
Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate
The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
Table: CAJA Environmental Services, November 2018.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SCG undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., distribution lines) that would cause significant environmental impacts. As such, no impacts on natural gas infrastructure would occur.

In 2015, the state anticipated a surplus difference of 179 million cf of gas between the supply and demand requirements. Therefore, it is anticipated that adequate supplies exist to accommodate the Project's demand for natural gas. Even if this were not the case, SCG would make the adequate changes in order to provide the load to the customer, as SCG has an obligation to serve projects in its service area. Overall, the Project would not require the acquisition of additional natural gas resources beyond those that are anticipated by SCG.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Ordinance and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards. Therefore, because of energy efficient design features, compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the three sites, Project impacts related to natural gas would be less than significant.

The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use. The Project shall comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria. The

Project shall comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

Transportation Energy Demand

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on the Project's estimated VMT of approximately 683,772 miles per year[211], and assuming the Project's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 22.711 mpgs[212], approximately 30,108 gallons of fuel would be required in a year. This would represent less than 0.001 percent of the statewide gasoline consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Sites would reduce the Project's consumption of gasoline and diesel. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

Alternative Energy Discussion

The use of energy provided by alternative (i.e., renewable) resources, off-site and on-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by LADWP, the service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation. LADWP is required to commit to the use of renewable energy sources for compliance with the California Renewable Energy Resources Act, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 MW or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and "other renewables that may be defined later".[213] LADWP's target procurement of energy from renewable resources was 20 percent by 2010. As of 2012, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that

[211] Operational VMT derived from the Air quality trips and VMT model sheets, included in appendix to the MND.

[212] Caltrans, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF.

[213] City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.

would meet Project demand. LADWP is committed to reach a goal of 35% renewable energy by 2020.[214]

With respect to on-site renewable energy sources, because of the Project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy, the use of heat naturally present in shallow soil or in groundwater or rock to provide building heating/cooling and to heat water, requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air to a building. Although methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form (i.e., a form that could be used without further treatment), and its extraction and treatment for energy purposes would result in secondary impacts; it is currently regulated as a hazardous material by the City through its Methane Code.

The City's Green Building Code discusses renewable energy (Section 99.04.211):

99.04.211.4. Solar Ready Buildings [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid after the effective date of the 2013 California Energy Code (Title 24, Part 6) shall comply with the following:

> 1. All one- and two-family dwellings, shall comply with Section 110.10(b)1A, 110.10(b)2, 110.10(b)3, 110.10(b)4, 110.10(c), 110.10(d) and 110.10(e) of the California Energy Code (Title 24, Part 6).
>
> 2. All buildings, other than one- and two-family dwellings, shall comply with Section 110.10(b) through 110.10(d) of the California Energy Code (Title 24, Part 6).

99.04.211.5. Space for Future Electrical Solar System Installation [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid prior to the effective date of the 2013 California Energy Code (Title 24, Part 6), shall provide a minimum of 250 square feet of contiguous unobstructed roof area for the installation of future solar photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Finally, solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant. Wind-powered energy is not viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin. The California Energy Commission (CEC) studied the State's

[214] https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-rpsprogram?_adf.ctrl-state=2zwwyiver_4&_afrLoop=482029044070877.

high wind resource potential.[215] Based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County. Additionally, there are no viable sites within the Project Site for placement and operation of a wind turbine. The CEC has identified areas within the State with high potential for viable solar, wind, and geothermal energy production. The CEC rated California's solar potential by county using insolation values available to typical photovoltaic system configurations, as provided by the National Renewable Energy Laboratory. Although Los Angeles as a County has a relatively high photovoltaic potential of 3,912,346 megawatt-hours (MWh)/day, inland counties such as Inyo (10,047,177 MWh/day), Riverside (7,811,694 MWh/day), and San Bernardino (25,338,276 MWh/day) are more suitable for large-scale solar power generation.[216] In addition, most of the high potential areas of greater than 6 KWh/sqm/day in Los Angeles County are concentrated in the northeastern corner of the county around Lancaster, approximately 30 miles away from the Project Site.

[215] California Energy Commission. California Wind Resource Potential, http://www.energy.ca.gov/maps/renewable/Wind_Potential.pdf.

[216] California Energy Commission, California Solar Resources, April 2005, http://www.energy.ca.gov/2005publications/CEC-500-2005-072/CEC-500-2005-072-D.PDF.

19. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact with Mitigation.

A significant impact may occur if a project would have an identified potentially significant impact for any of the above issues. The Project Site is located in an urbanized area of the City. The Project will have a less than significant impact on historic resources, archeological resources, paleontological resources, and human remains. As previously discussed in this IS/MND, the Project will not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise) (**MM-Bio-1** to **MM-Bio-5**), or eliminate important examples of the major periods of California history or pre-history (**MM-Culural-1 to MM-Cultural-4**), or affect any unknown tribal cultural resources within the Project Site (**MM-Tribal-1**). Therefore, impacts from the Project would be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact.

A significant impact may occur if a project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The Project will not combine with other potential future projects nor is it expected to have concurrent construction in the immediate area to create a cumulatively significant impact in any of the environmental issue areas analyzed in the IS/MND.

The cumulative impacts analysis is based on projections in the regional AQMP. The Project is consistent with the growth assumptions in the City's General Plan, the 2016 RTP/SCS, and the regional AQMP. Further, the project does not increase the frequency or severity of an air quality standards violation or cause a new violation. Because there is no cumulative significant impact and the Project is consistent with the growth assumptions in the 2016 RTP/SCS and the AQMP, the combined effects are not cumulatively significant. Therefore, the Project would not result in a significant long-term cumulative impact.

Local temperatures could increase in time as a result of Global Climate Change (GCC) with or without development as envisioned by the project. This increase in temperature could lead to

other climate effects, including, but not limited to, increased flooding due to increased precipitation and runoff. At present, the extent of GCC impacts is uncertain, and more extensive monitoring of runoff is necessary for greater understanding of changes in hydrologic patterns. Studies indicate that increased temperatures could result in a greater portion of peak stream flows occurring earlier in the spring, with decreases in late spring and early summer (CEC 2006). These changes could have implications for water supply, flood management, and ecosystem health. In addition, there is a potential for sea level rising due to global warming. However, as the Project Site is located more than 5 mi from the ocean and at an elevation that would not subject it to local flooding, the Project is not expected to be significantly affected by GCC.

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040. Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant with implementation of provided mitigation measures (where applicable). These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the related projects in the City. In addition, some related projects could be subject to SB 610, which requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand. Ultimately, the wastewater and water facilities (HTP and LAAFP) and the Puente Hills MRF, Sunshine Canyon landfill, and Mesquite landfill have adequate capacity to accommodate the project and related projects along with the general growth within the City. The Project's contribution to cumulative wastewater, water, and solid waste impacts will not be cumulatively considerable and cumulative impacts would be less than significant.

The Project's contribution to the cumulative natural gas demand would not be substantial. Therefore, Project impacts to natural gas demand would not be cumulatively considerable or significant. These estimates do not account for energy reduction features employed by the Project or related projects. Each of the related projects would be evaluated within its own context with consideration of energy conservation features that could alleviate natural gas demand. Further, any related project would need to be consistent with the building energy efficiency requirements of Title 24 as well as how SCG serves each location with its existing distribution infrastructure.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The related projects would be in compliance with the City's Green Building Ordinance (for the City of Los Angeles) and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards.

All forecasted growth would incorporate design features and energy conservation measures, as required by Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2018-2030. Thus, there is a plan to secure natural gas supplies to meet demand. Therefore cumulative impacts would be less than significant.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact with Mitigation.

A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts.

Construction noise levels would exceed the City's construction noise level standard of 75 dBA L_{max} at a distance of 50 ft because construction activities would occur between 7:00 a.m. and 10:00 p.m. within 500 ft of a residential zone. The implementation of **Mitigation Measures MM-Noise-1** through **MM-Noise-5** would be required to reduce potential construction noise impacts to less than significant.

Thus, the Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.

4. LIST OF PREPARERS

Lead Agency	**City of Los Angeles** Department of City Planning 6262 Van Nuys Boulevard, Suite 430, Van Nuys, CA 91401 Michelle Levy, Senior City Planner Valentina Knox-Jones, City Planner Christine Bustillos, Planning Assistant
Environmental Consultant	**CAJA Environmental Services** 15350 Sherman Way, Suite 315, Van Nuys, CA 91406 Chris Joseph, President Seth Wulkan, Project Manager
Project Applicant	**Santa Susana Estates, LLC** 11766 Wilshire Boulevard, Suite 820, Los Angeles, CA 90025
Architect	**Dahlin** 18818 Teller Avenue, Suite 260, Irvine, CA 92612
Air Quality and GHG	**LSA Associates, Inc.** 20 Executive Park, Suite 200, Irvine, CA 92614
Biological	**LSA Associates, Inc.** 20 Executive Park, Suite 200, Irvine, CA 92614
Cultural	**PSOMAS** 3 Hutton Centre Drive, Suite 200, Santa Ana, CA 92707
Historic	**Daly & Associates** 2242 El Capitan Drive, Riverside, CA 92506
Geotechnical	**Albus-Keefe and Associates, Inc.** 1011 North Armando Street, Anaheim, CA 92806
Hazards	**Partner Engineering and Science, Inc.** 2154 Torrance Boulevard, Suite 200, Torrance, CA 90501
Landscape	**Studio Pad** 23282 Mill Creek Drive, Suite 200, Laguna Hills, CA 92653
Land Use	**Stantec Consulting Services, inc.** 14801 Califa Street, Van Nuys, CA 91411

Noise	**LSA Associates, Inc.** 20 Executive Park, Suite 200, Irvine, CA 92614
Traffic	**Hirsch/Green Transportation Consulting, Inc.** 13333 Ventura Boulevard, Suite 204, Sherman Oaks, CA 91423
Trees	**The Tree Resource** P.O. Box 49314, Los Angeles, CA 90049