City of Los Angeles

Clarendon Street Apartments Development Project

Initial Study

October 2015

Environmental Scientists Planners Engineers

Clarendon Street Apartments Development Project

22055-22147 Clarendon Street

Los Angeles, CA 91367

Revised Initial Study

Prepared for:

City of Los Angeles
200 North Spring Street, Suite 750
Los Angeles, CA 90012

Prepared with the assistance of:

Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003

October 2015

This report prepared on 50% recycled paper with 50% post-consumer content.

Table of Contents

Page

Initial Study 1
1. Project Title: 1
2. Lead Agency Name and Address: 1
3. Contact Person and Phone Number: 1
4. Project Location: 1
5. Project Sponsor's Name and Address: 1
6. General Plan Designation: 1
7. Specific Plan Designation: 1
8. Zoning: 1
9. Description of Project: 1
10. Surrounding Land Uses and Setting: 2
11. Other Public Agencies Whose Approval is Required: 3

Environmental Factors Potentially Affected 12
Determination 13
Environmental Checklist 14
I. Aesthetics 14
II. Agriculture and Forestry Resources 18
III. Air Quality 19
IV. Biological Resources 27
V. Cultural Resources 30
VI. Geology and Soils 32
VII. Greenhouse Gas Emissions 38
VIII. Hazards and Hazardous Materials 41
IX. Hydrology and Water Quality 47
X. Land Use and Planning 52
XI. Mineral Resources 54
XII. Noise 55
XIII. Population and Housing 60
XIV. Public Services 62
XV. Recreation 65
XVI. Transportation/Traffic 66
XVII. Utilities and Service Systems 70
XVIII. Mandatory Findings of Significance 78
Bibliography 80
Persons Contacted 82

List of Figures

Figure 1 Regional Location 4
Figure 2 Project Site Location 5
Figure 3 Proposed Site Plan 6
Figure 4 Photos of Project Site 8
Figure 5 Photos of Surrounding Uses 9

Figure 6 Summer Shadows 10
Figure 7 Winter Shadows 11

List of Tables

Table 1 Proposed Project Characteristics 2
Table 2 Current Federal and State Ambient Air Quality Attainment Standards 20
Table 3 Health Effects Associated with Criteria Pollutants 21
Table 4 SCAQMD Air Quality Significance Thresholds 22
Table 5 SCAQMD LSTs for Construction 23
Table 6 Typical Noise Levels at Construction Sites 64
Table 7 Student Generation Rates 64
Table 8 Project Trip Generation 68
Table 9 Estimated Wastewater Generation 71
Table 10 Multiple Dry Years Water Supply and Demand 73
Table 11 Solid Waste Disposal Facilities 76
Table 12 Estimated Solid Waste Generation 76

Appendix

Appendix A: Trip Generation Analysis

INITIAL STUDY

1. Project Title:	Clarendon Street Apartments Development Project
2. Lead Agency Name and Address:	City of Los Angeles 200 North Spring Street, Room 750 Los Angeles, CA 90012
3. Contact Person and Phone Number:	Adam Villani (818) 374-5067
4. Project Location:	22055-22147 Clarendon Street Los Angeles, CA 91367 APN: 2169-026-110 Acres: 4.22 The project site encompasses approximately 4.22 acres and is located at 22055-22147 Clarendon Street in the neighborhood of Woodland Hills in the City of Los Angeles, California. Figure 1 shows the regional location. Figure 2 shows the project site location.
5. Project Sponsor's Name and Address:	Darin Hansen, Vice President AMCAL Equities, LLC 30141 Agoura Road, Suite 100 Agoura Hills, CA 91301
6. General Plan Designation:	Community Commercial
7. Specific Plan Designation:	Community Commercial
8. Zoning:	One-Family (R1-1VL), Limited Commercial (CR-1VLD), Automobile Parking (P-1VLD)

9. Description of Project:

The proposed project would involve demolition of an existing United States Post Office (USPS) Retail Store and Distribution Center and office building, and development of a multi-family housing project consisting of a five-story residential building with 335 residential units, club house, leasing office, 369 bicycle storage spaces, and a five-story, six-level parking garage. The proposed residential project would have a density of 335 residential units including an affordable set-aside of 5% very low income units. The proposed residential and parking structures would be located adjacent to US Highway 101, on the site's northern boundary. The parking structure would provide 560 parking spaces, with an additional four spaces provided

on-grade. Vehicular access to the project site would be provided by two entrances located on along Clarendon Street between Farralone Avenue and Glade Avenue, and between Glade Avenue and the on-ramp to Topanga Canyon Boulevard.

Project characteristics are summarized in Table 1. Figure 3 shows the conceptual site plans.

Table 1
Proposed Project Characteristics

Project Site Size	4.22 acres (183,799 square feet)
Existing On-Site Uses	USPS Post Office: 29,638 sf Office Building: 10,929 sf
Proposed Floor Area	385,976 sf
Proposed Parking	Automobile parking: 564 spaces Bicycle parking: 369 spaces
Proposed Height	Residential Structure: 5 stories, 56 feet maximum Parking Structure: 5 stories, 6 levels, 56 feet maximum

An environmental impact report (EIR) will be prepared for the project. In accordance with Section 15063(c) of the Guidelines for the California Environmental Quality Act (CEQA Guidelines), the purpose of this Initial Study is to focus the EIR on the effects preliminarily determined to be significant; identify the effects preliminary determined not to be significant and therefore do not need to be studied in the EIR; and explain the reasons for determining that potentially significant effects have been preliminarily determined not to be significant.

In accordance with Section 15126(d) of the CEQA Guidelines, the EIR will examine a range of reasonable alternatives to the proposed project that could feasibly achieve similar objectives. The following alternatives will be considered in the EIR:

- No Project Alternative.
- 100% Commercial Alternative: This alternative will consider a commercial development on the project site, rather than a residential project.
- Mixed-Use Development Alternative: This alternative will consider a mixed-use residential and commercial project that would be 45-feet high and comply with applicable local zoning codes.

10. Surrounding Land Uses and Setting:

The project site is currently developed with a one-story commercial structure utilized as a U.S. Postal Service (USPS) post office (29,638 square feet) and a two-story commercial office building (10,929 square feet). The remainder of the site is developed with paved parking lots and landscaped areas. Figure 4 shows photos of the project site. The project site has a General Plan designation of Community Commercial. The project site is within the Ventura/Cahuenga Boulevard Corridor Specific Plan area and also has a Specific Plan designation of Community Commercial. The project site's zoning is not consistent with its current General Plan and

Specific Plan designation. The project site is zoned One-Family (R1), Limited Commercial (CR), and Automobile Parking (P).

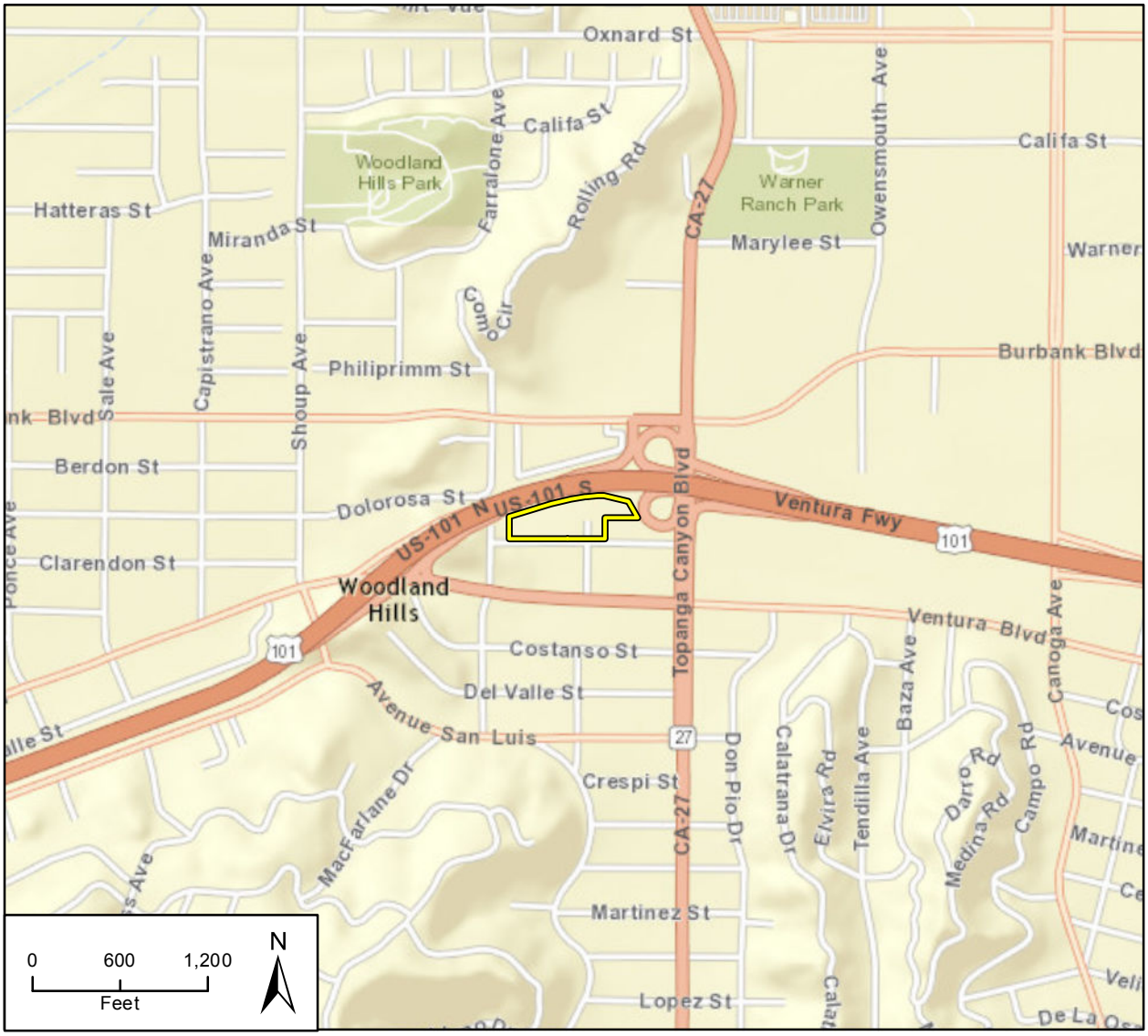
The project site is bordered by US Highway 101 to the north, Clarendon Street to the south, existing commercial development to the west and southeast, and the US Highway 101 southbound on-ramp from State Route 27 and a residential property to the east. Figure 5 shows photos of the surrounding uses.

11. Other Public Agencies Whose Approval is Required:

The following approvals from the City of Los Angeles would be required:

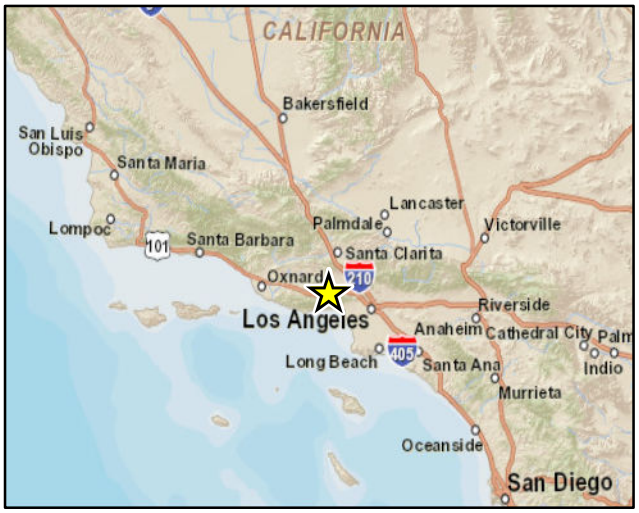
- *Zone and Height District Change from R1-1VL, [Q]CR-1VLD, and P-1VLD to [T][Q]RAS4-1L (pursuant to Section 12.32 of the Los Angeles Municipal Code [LAMC]) to bring about consistency between the General Plan and Specific Plan Community Commercial designations for the site and its zoning designations;*
- *Waiver of Development Standards (pursuant to LAMC Section 12.22. A.25 Affordable Housing Incentives – Density Bonus and utilizing Parking Option 1) to allow:*
    - *Building height of 56 feet in lieu of the 45 foot height limitation of the Ventura Cahuenga Boulevard Corridor Specific Plan Section 7.E.1.e.;*
    - *Floor area ratio of 2.1:1 in lieu of 1.25:1 floor area limitation of the Ventura Cahuenga Boulevard Corridor Specific Plan Section 6.B.a.;*
- *Project Permit Compliance Review for the Ventura Cahuenga Boulevard Corridor Specific Plan (pursuant to LAMC Section 11.5.7.F); and*
- *Site Plan Review for residential development projects greater than 50 units (pursuant to LAMC Section 16.05).*

Additional approvals, if any, necessary from the City of Los Angeles and/or other agencies will be identified during the CEQA process.



Imagery provided by National Geographic Society, ESRI and its licensors © 2015. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

Project Location



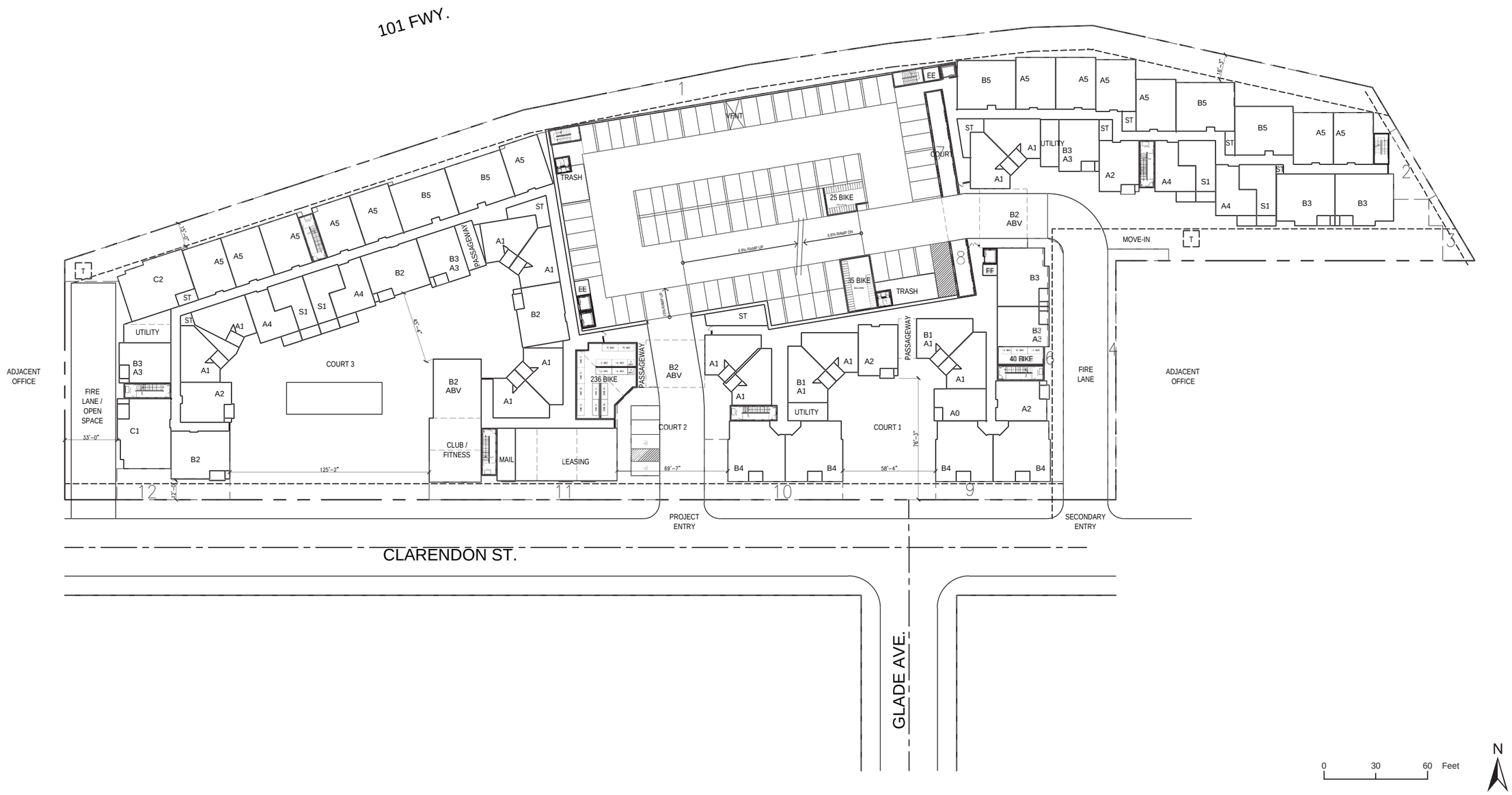
Regional Location

Figure 1

Imagery provided by ESRI and Google and their licensors © 2015.

Project Site Location

Figure 2



Conceptual Site Plan

Source: Architects Orange, March 2015

Figure 3

Photo 1: Existing on-site U.S. Post Office building (22121 Clarendon Street)

Photo 2: Existing on-site office building (22053 Clarendon Street)

Photo 3: U.S. Post Office loading and parking area

Photo 4: View of U.S. 101 from project site

Photos of Project Site

Figure 4

Photo 1: Warner Pointe apartments located south of project site (22044 Clarendon Street)

Photo 2: Office building located south of the project site (22110 Clarendon Street)

Photo 3: Office building located south of the project site (22120 Clarendon Street)

Photo 4: Office buliidng located southwest of the project site (22144 Clarendon Street)

Photos of Surrounding Uses

Figure 5

June 21, 9:00am

June 21, 12:00pm

June 21, 3:00pm

June 21, 6:00pm

Summer Shadows

Figure 6

December 21, 8:00am

December 21, 10:00am

December 21, 12:00pm

December 21, 3:00pm

Winter Shadows

Figure 7

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

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 potential 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.

Ewa Nuño-O'Donnell
Signature

10·30·15
Date

ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
I. 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 state 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?	☐	☐	■	☐
e) Result in shade created by project-related structures on shadow-sensitive uses?	☐	☐	■	☐

a) ***LESS THAN SIGNIFICANT IMPACT***. Based on the 2006 City of Los Angeles *L.A. CEQA Thresholds Guide (L.A. CEQA Thresholds Guide),* a significant impact may occur if the proposed project (the "project") introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a 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). The determination of whether a project results 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 proposed project would involve replacing existing one and two-story structures with five-story residential buildings and a parking structure with a maximum height of 56 feet (see Figure 4 for photos of the project site). However, the proposed project would not block any scenic

vistas because there are no views of scenic vistas from the project site. The project site is relatively flat and is surrounded on all sides by development and mature trees that block views from the site and surrounding areas. North of the project site is the US Highway 101, which is elevated. Views to the north from the project site and areas to the south of the site are blocked by the elevated US Highway 101. In addition, views from the US Highway 101 to areas south of the project site are limited because the US Highway 101 is lined with mature trees that block views. No further analysis of this issue in an EIR is warranted.

b) ***LESS THAN SIGNIFICANT IMPACT***. Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur only if scenic resources would be damaged and/or removed by development of a project.

The project site is developed with a post office, commercial building, and parking areas (see Figure 4 for site photos). The project site does not include any scenic resources. There are no scenic rock outcroppings on the project site. The project site contains mature trees, but the trees are typical landscape trees and do not have exceptional aesthetic or scenic value. The project site is located adjacent to US Highway 101, which is eligible, but not officially designated a scenic highway, by the California Department of Transportation (Caltrans) (Caltrans, 2011). However, the City of Los Angeles General Plan designates US Highway 101 as a scenic highway (City of Los Angeles, 1999). The Transportation Element of the City of Los Angeles General Plan established guidelines for designated scenic highways. These guidelines are designed to be interim, utilized until a Scenic Corridor Plan is established in accordance with the individual scenic character or concept associated with the specific designated highway. The Ventura-Cahuenga Boulevard Corridor Specific Plan was amended by Ordinance No. 174,052 and went into effect on August 18, 2001. The Corridor Specific Plan does not outline requirements regarding scenic highways, so the interim guidelines outlined in the Transportation Element are utilized. The interim guidelines include requirements regarding (1) roadway, (2) earthwork/grading, (3) planting/landscaping, (4) signs/outdoor advertising, and (5) utilities (City of Los Angeles, 1999).

The proposed project would involve removal of a one-story post office and two-story office building, the construction of a residential building, and no changes in the freeway design characteristics are proposed. Earthwork and grading would take place only on the proposed project site, and not on the adjacent US Highway 101. Likewise, tree removal would take place at the project site; however, no trees along the US Highway 101 frontage would be removed. The proposed project does not include integration of signage or outdoor advertising, and the existing utilities in place would not need to be expanded to accommodate the project. Additionally, the proposed project would replace the existing commercial structures and parking areas with structures of scale and density similar to that of surrounding properties. Therefore, the view from US Highway 101 would not be significantly altered by the proposed project. No further analysis of this issue in an EIR is warranted.

c) ***LESS THAN SIGNIFICANT IMPACT***. Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur if the proposed project would result in the removal of one or more features that contribute to the valued aesthetic character or image of the neighborhood, community, or localized area or if the proposed project were 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.

The proposed project would involve removal of a one-story post office and two-story office building and construction of a residential building with a maximum height of 56 feet. The proposed project would change the visual character of the site by changing the land use from commercial to residential and introducing buildings that are one to four stories higher than the existing buildings. The project would also replace the existing commercial structures and parking areas, which have low to moderate visual quality, with a new structure with an updated contemporary aesthetic. The new residential building would be generally compatible in scale with the office and residential buildings located on the south side of Clarendon, which range from one to five stories and include an eclectic range of architectural styles (see Figure 5 for photos of surrounding buildings). The proposed structure would not conflict with these surrounding styles. No further analysis of this issue in an EIR is warranted.

d) ***LESS THAN SIGNIFICANT IMPACT***. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the proposed project introduces new sources of light or glare on or from the project site which would be incompatible with the areas surrounding the project site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The determination of whether the proposed project results in a significant nighttime illumination impact shall be made considering the following factors:

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and effect adjacent light-sensitive areas.

The proposed project involves the replacement of the existing post office, office building, and parking areas with residential uses. The existing structures and parking lot include outdoor lighting. Parking lot lighting is oriented towards the ground. Lighting associated with the existing buildings on-site includes both shielded and unshielded lighting. Additionally, the adjacent commercial, residential, and roadway uses generate nighttime light and daytime glare along all sides of the property.

The proposed project would incorporate exterior lighting, in the form of pedestrian walkway lighting, courtyard lighting, building mounted lighting, and other safety related lighting. These light sources would not have a significant impact on the night sky, as they would only incrementally add to the existing background light levels already present as a result of the surrounding urban development.

The windows proposed on the exterior elevations could increase the reflected sunlight during certain times of the day. However, these impacts would be similar to those already experienced during the daily occupation of the surrounding residential dwellings and during normal operation of the surrounding commercial retail uses.

Furthermore, the proposed project would be subject to the City's Green Building Code (Chapter IX, Article 9) which includes provisions for light and glare reduction (LAMC Section 99.05.106.8). Table 5.106.8 in the LAMC sets maximum allowable backlight, uplight, and glare ratings.

While lighting impacts are not expected to be significant, the following mitigation from the *L.A. CEQA Thresholds Guide*, will be incorporated into the Project to further reduce spillover lighting effects:

AES-1 **Lighting.** The proposed project shall include measures to reduce nighttime lighting spillover. These may include, but are not limited to:

- Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting;
- Prohibit or limit signs with flashing, mechanical, strobe, or blinking lights; moving parts; or lighted monument signs;
- Provide structural and/or vegetative screening from sensitive uses;
- Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses; and
- Restrict the operation of outdoor lighting for recreational activities to the hours of 7:00 AM to 10:00 PM

Implementation of the City's municipal code requirements and mitigation measure AES-1 would further ensure that light and glare impacts would be less than significant**.** Further analysis of this issue in an EIR is not warranted.

e) ***LESS THAN SIGNIFICANT IMPACT***. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the proposed project structures shade a shadow-sensitive area for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Daylight Time (PDT) from late October to early April (winter), or more than four hours between the hours of 9:00 AM and 5:00 PM from early April to late October (summer).

The proposed project involves the removal of a one-story post office and two-story office building and construction of a residential building with a maximum height of 56 feet. A shade study (completed June 2015) evaluated the potential shade impact that the proposed project would have on the surrounding uses (Figures 6 and 7). The project site is bordered by US Highway 101 to the north, Clarendon Street to the south, existing commercial development to the west and southeast, and the US Highway 101 southbound on-ramp from State Route 27 and a residential property to the east. The study found that the proposed project would not create a significant shadow impact because the proposed project would only create an estimated 1.5 hours of shade during summer, with the shadow beginning to affect the adjacent residential property to the east at 3:30 PM and an estimated 1.75 hours of shade during the winter, with the shadow beginning to affect the property to the east at 1:45 PM. This will be analyzed further in an EIR.

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

a, b, e) ***NO IMPACT***. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the project were to convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance; conflicted with existing zoning for agricultural use, or a Williamson Act contract; or otherwise converted agriculture. The project site is developed with a post office and commercial building. The site is within the Los Angeles city limits, is zoned CR, P, and R1 and is designated on the City's General Plan as Community Commercial. The California Department of Conservation's 2010 map of Los Angeles County Important Farmland shows that the project site is within an area of "urban and built-up land" and not within an area of "prime farmland" (Department of Conservation, 2011).

The project site is not under Williamson Act contract (Department of Conservation, 2013). The project site is not located on agricultural land and the project would not involve any development that could result in the conversion of farmland to non-agricultural uses. For these reasons, the project would have no impact with respect to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use; conflict with existing agricultural zoning or Williamson Act contract; or other conversion of farmland to non-agricultural use.

c, d) ***NO IMPACT***. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the proposed project conflicts with existing zoning or rezoning or resulted in the loss or conversion of forest land or timberland. The project site is not located on or near forest land or timberland, and the project would have no impact on such resources.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY				
-- Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	■	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	■	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?				
i.) Expose occupants to potentially elevated concentrations of diesel particulates?	■	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY				
-- Would the project:				
e) Create objectionable odors affecting a substantial number of people?	☐	☐	■	☐

The federal and state governments have been empowered by the federal and state Clean Air Acts to regulate emissions of airborne pollutants and have established ambient air quality standards for the protection of public health. Federal and state ambient air quality standards have been established for six criteria pollutants, including ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulates less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$), and lead (Pb). Table 2 lists the current federal and state standards for these criteria pollutants. California air quality standards are identical to or stricter than federal standards for all criteria pollutants. California has also set ambient standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Table 2
Current Federal and State Ambient Air Quality Attainment Standards

Pollutant	Federal Standard	California Standard
Ozone	0.075 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.07 ppm (8-hr avg)
Carbon Monoxide	9.0 ppm (8-hr avg) 35.0 ppm (1-hr avg)	9.0 ppm (8-hr avg) 20.0 ppm (1-hr avg)
Nitrogen Dioxide	0.100 ppm (1-hr avg) 0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.03 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg)	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)
Lead	0.15 $\mu g/m^3$ (3-mo avg)	1.5 $\mu g/m^3$ (30-day avg)
Particulate Matter (PM_{10})	150 $\mu g/m^3$ (24-hr avg)	50 $\mu g/m^3$ (24-hr avg) 20 $\mu g/m^3$ (annual avg)
Particulate Matter ($PM_{2.5}$)	12 $\mu g/m^3$ (annual avg) 35 $\mu g/m^3$ (24-hr avg)	12 $\mu g/m^3$ (annual avg)

ppm= parts per million $\mu g/m^3$ = micrograms per cubic meter
Source: California Air Resources Board, http://www.arb.ca.gov/research/aaqs/aaqs2.pdf, June 2013

The health effects associated with criteria pollutants are described in Table 3.

The project site is within the South Coast Air Basin (the Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to ensure that

state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Table 3
Health Effects Associated with Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(a) Pulmonary function decrements and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; (f) Property damage
Carbon monoxide (CO)	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; (d) Possible increased risk to fetuses
Nitrogen dioxide (NO_2)	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; (c) Contribution to atmospheric discoloration
Sulfur dioxide (SO_2)	(a) Bronchoconstriction accompanied by symptoms which may include wheezing, shortness of breath, and chest tightness during exercise or physical activity in persons with asthma
Suspended particulate matter (PM_{10})	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Decline in pulmonary function or growth in children; (c) Increased risk of premature death
Suspended particulate matter ($PM_{2.5}$)	
Lead (Pb)	(a) Learning disabilities; (b) Impairment of blood formation and nerve Conduction

Source: SCAQMD, 2013
[a] More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: Office of Environmental Health Hazard Assessment, Particulate Matter Health Effects and Standard Recommendations, www.oehha.ca.gov/air/toxic_contaminants/PM10notice.html#may, May 9, 2002; and EPA, Air Quality Criteria for Particulate Matter, October 2004.

Depending on whether or not the standards are met or exceeded, the Basin is classified as being in "attainment" or "nonattainment." The part of the Basin within which the project site is located is in nonattainment for the federal standards for ozone, $PM_{2.5}$, and Pb and the state standards for ozone, PM_{10}, $PM_{2.5}$, NO_2, and Pb (California Air Resources Board, Area Designations Maps/State and National, September 2011; EPA, June 26, 2013;). Thus, the Basin currently exceeds several state and federal ambient air quality standards and is required to implement strategies to reduce pollutant levels to recognized acceptable standards. This nonattainment status is a result of several factors, the primary ones being the naturally adverse meteorological conditions that limit the dispersion and diffusion of pollutants, the limited capacity of the local airshed to eliminate pollutants from the air, and the number, type, and density of emission sources within the Basin.

Despite the current nonattainment status, air quality within the Basin has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly due to lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend toward cleaner air

has occurred in spite of continued population growth. As discussed in the 2012 Air Quality Management Plan (AQMP) for the SCAB as a whole:

> *Despite this growth, air quality has improved significantly over the years, primarily due to the impacts of the region's air quality control program…PM_{10} levels have declined almost 50% since 1990, and $PM_{2.5}$ levels have also declined 50% since measurements began in 1999. As shown in Chapters 2 and 5, the only air monitoring station that is currently exceeding or projected to exceed the 24-hour $PM_{2.5}$ standard from 2011 forward is the Mira Loma station in Western Riverside County. Similar improvements are observed with ozone, although the rate of ozone decline has slowed in recent years. (2012 Air Quality Management Plan for the South Coast Air Basin. (Introduction, pages 1-5; Available at: http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/MainDoc.pdf).*

These trends are projected to continue into the future, as described in Chapter 5 of the 2012 AQMP for the South Coast Air Basin.

The SCAQMD thresholds for temporary construction-related pollutant emissions and project operations are shown in Table 4. These thresholds are utilized for the project specific analysis as well as determining whether the project would contribute a cumulatively considerable increase to emissions.

Table 4
SCAQMD Air Quality Significance Thresholds

Pollutant	Mass Daily Thresholds	
	Operation Thresholds	Construction Thresholds
NO_X	55 lbs/day	100 lbs/day
ROG[1]	55 lbs/day	75 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

[1] Reactive Organic Gases (ROG) are formed during combustion and evaporation of organic solvents. ROG are also referred to as Volatile Organic Compounds (VOC).
Source: SCAQMD, http://www.aqmd.gov/ceqa/handbook/signthres.pdf, March 2011.

In addition to the thresholds shown in Table 4, the SCAQMD has developed Localized Significance Thresholds (LSTs). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project size, distance to the sensitive receptor, etc. However, LSTs only apply to emissions within a fixed stationary location, including idling emissions during both project construction

and operation. LSTs have been developed for NO_X, CO, PM_{10}, and $PM_{2.5}$. LSTs are not applicable to mobile sources such as cars on a roadway (Final Localized Significance Threshold Methodology, SCAQMD, June 2003). As such, LSTs for operational emissions do not apply to on-site development as the majority of emissions would be generated by cars on the roadways.

LSTs have been developed for emissions within areas up to five acres in size, with air pollutant modeling recommended for activity within larger areas. The SCAQMD provides lookup tables for project sites that measure one, two, or five acres. The project site is located in Source Receptor Area 3 (SRA-3, Southwest Coastal LA County). Though the project site is 4.275 acres in size, it is assumed that construction would not occur on more than two acres on any given construction day. According to the SCAQMD's publication *Final Localized Significant (LST) Thresholds Methodology*, the use of LSTs is voluntary, to be implemented at the discretion of local agencies. LSTs for construction are shown in Table 5.

Table 5
SCAQMD LSTs for Construction

Pollutant	Allowable emissions as a function of receptor distance in feet from a two-acre site (lbs/day)				
	82 Feet	164 Feet	328 Feet	656 Feet	1,640 Feet
Gradual conversion of NO_x to NO_2	131	128	139	165	233
CO	967	1,158	1,597	2,783	7,950
PM_{10}	8	23	37	65	148
$PM_{2.5}$	5	7	12	25	81

Source: http://www.aqmd.gov/CEQA/handbook/LST/appC.pdf, October 2009.

a) ***LESS THAN SIGNIFICANT IMPACT***. Based on the *L.A. CEQA Thresholds Guide*, a significant air quality impact may occur if the proposed project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. According to SCAQMD Guidelines, to be consistent with the AQMP, a project must conform to the local General Plan and must not result in or contribute to an exceedance of the City's projected population growth forecast.

The 2012 AQMP relied upon the projections developed by the Southern California Association of Governments (SCAG). According to SCAG growth forecasts, the City of Los Angeles will have a population of 3,991,700 in 2020, an increase of 87,043 over the current City population of 3,904,657 (California Department of Finance, May 2014). Development of 335 dwelling units on the project site could cause an increase in the City's population. Using the California Department of Finance average household size for Los Angeles of 2.85 persons, the 335 dwelling units would generate an average resident population of 955 persons (335 units x 2.85 persons/unit). Therefore, the proposed project would result in a total population of approximately 3,905,612 persons (3,904,657 + 955). This increase in population would be within the City's projected 2020 population of 3,991,700. Since project-related population growth

would be within SCAG population growth forecasts, the project would be consistent with the AQMP.

b, c) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED.*** Based on the *L.A. CEQA Thresholds Guide*, a project may have a significant impact where:

- Project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.
- A project would add a considerable cumulative contribution to federal or state non-attainment pollutant.

The City of Los Angeles utilizes the thresholds for the environmental review of plans and development proposals within its jurisdiction as outlined above. The SCAQMD currently recommends that impacts to sensitive receptors be considered significant when emissions generated at a project site causes localized CO and NO_2 levels to exceed state ambient air quality standards at sensitive receptors or where a project causes an increase in local $PM1_0$ levels of 10.4 µg/m^3during construction and 2.5 g/m^3during operation of the project. A significant impact may also occur where a project would cause concentrations at sensitive receptors located near congested intersections to exceed the national or state ambient air quality standards and the traffic generated by the project contributes at least 1.0 parts per million (ppm) to the 1-hour concentrations or 0.45 ppm to the 8-hour concentrations.

As mentioned above, Los Angeles County is in nonattainment for the federal standards for ozone, $PM_{2.5}$, and Pb and the state standards for ozone, PM_{10}, $PM_{2.5}$, NO_2, and Pb (California Air Resources Board, Area Designations Maps/State and National, September 2011; EPA, June 26, 2013;). Thus, the County currently exceeds several state and federal ambient air quality standards and is required to implement strategies to reduce pollutant levels to recognized acceptable standards. Additionally, the project site is within 500 feet of US Highway 101 and therefore may be subject to substantial concentrations of diesel exhaust particulates, a potentially toxic air contaminant. This may expose site residents to unhealthful air quality.

Emissions generated by the proposed project would include temporary construction emissions and long-term operational emissions. Construction activities such as the operation of construction vehicles and equipment over unpaved areas, grading, trenching, and disturbance of stockpiled soils have the potential to generate fugitive dust (PM_{10}) through the exposure of soil to wind erosion and dust entrainment. In addition, exhaust emissions associated with heavy construction equipment would potentially degrade air quality. Emissions could exceed SCAQMD significance thresholds and could expose nearby sensitive receptors to pollution.

Long-term emissions associated with operational impacts would include emissions from vehicle trips, natural gas and electricity use, landscape maintenance equipment, and consumer products and architectural coating associated with on-site development. Emissions could exceed SCAQMD significance thresholds and could expose nearby sensitive receptors to pollution.

Included below are mitigation measures to be used to reduce construction and operational emissions. These mitigation measures are recommended for the proposed project and include:

AQ-1 **Construction Emissions.** The proposed project shall implement measures to reduce air pollution emissions during construction. These may include, but are not limited to:

- Establish an on-site construction equipment staging area and construction worker parking lot, located on either paved surfaces or unpaved surfaces subjected to soil stabilization treatments, as close as possible to a public highway. Control access to public roadways by limiting curb cuts/driveways to minimize project construction impacts upon roadway traffic operations;
- Properly maintain non-vehicular equipment engines to minimize the volume of exhaust emissions;
- Use electricity from power poles, rather than temporary diesel or gasoline powered generators;
- Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane);
- Pave construction roads;
- Inspect construction equipment prior to leaving the site and wash off loose dirt with wheel washers, as necessary; and
- Provide ridesharing or shuttle service for construction workers.

AQ-2 **Operational Emissions.** The proposed project shall implement the following measures to reduce air pollution emissions during operation. These may include, but are not limited to:

- Install on-site pollution control equipment;
- Modify industrial processes to reduce emissions;
- Provide telecommunications centers near residential areas;
- Establish shuttle service from residential areas to transit centers or commercial core areas;
- Construct off-site pedestrian facility improvements, such as overpasses and wider sidewalks;
- Contribute to regional transit systems (e.g., right-of-way, capital improvements, etc.);
- Construct, contribute, or dedicate land for the provision of off-site bicycle trails linking the facility to designated bicycle commuting routes;
- Provide video-conferencing facilities;
- Implement home dispatching system where employees receive routing schedule by phone instead of driving to work;
- Use low-emission fleet vehicles;
- Provide on-site child care facilities;
- Provide services, facilities, or incentives to reduce employee work trips. Consider ride share programs or shuttle service for employees;
- Include adequate ventilation systems in parking structures to dissipate CO emissions;

- Contribute to signal synchronization at congested areas;
- Locate sensitive receptors away from potential "hotspots;" and
- Provide barriers, such as wall or vegetative screen, between hotspots and sensitive receptors.

AQ-3 **Toxic Air Contaminants.** The proposed project shall implement the following measures to reduce air pollution emissions during operation. These may include, but are not limited to:

- Provide barriers that reduce emissions (e.g., screens, vents, closed systems);
- Use non-toxic or less toxic substances in project construction or operation;
- Investigate opportunities and implement programs to improve efficiency and/or reduce the amount of waste emissions generated;
- Provide forced air ventilation with filter screens on outside air intake ducts for the residences. The filter screens shall have a minimum efficiency reporting value (MERV) rating of 12 (these filters have efficiency rates exceeding 95%); and
- For individual residential units with separate HVAC systems, a brochure notifying the future residents of the need for maintaining the filter screens shall be prepared and provided at the time of ownership exchange.

The impacts related to both temporary construction-related air pollutant emissions and long-term emissions would be potentially significant unless mitigation is incorporated. This will be analyzed further in an EIR.

d) ***POTENTIALLY SIGNIFICANT IMPACT***. Based on the *L.A. CEQA Thresholds Guide*, a project may have a significant impact where a project would expose sensitive receptors to substantial pollutant concentrations.

The proposed project site is located immediately adjacent to US Highway 101; therefore, occupants could potentially be exposed to elevated concentrations of diesel particulates. This could create health risks for site occupants. This issue will be further studied in the EIR.

e) ***LESS THAN SIGNIFICANT IMPACT***. Although not specified in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if construction or operation of the project would result in generation of odors that would be perceptible in adjacent sensitive areas. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

The proposed project would involve construction of a residential project. This type of use would not be expected to generate objectionable odors that would affect a substantial number of people. Residential uses are not included on Figure 5-5, *Land Uses Associated with Odor*

Complaints, of the 1993 SCAQMD CEQA Air Quality Handbook. Therefore, the proposed project would not generate objectionable odors. Further analysis of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES				
-- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	■
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or 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, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	■
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	■	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐
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?	☐	☐	☐	■

a, b, c) ***NO IMPACT***. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- The alternation of an existing wetland habitat; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The project site is centrally located in a developed area of Woodland Hills. The project site and surrounding properties are developed with urban land uses. Due to the developed nature of the site, the project site lacks significant native vegetation that would provide habitat for any unique, rare, or endangered plant or animal species. On-site landscaping consists of ornamental species that lack habitat value. Additionally, no wetlands are located on or adjacent to the project site (USFWS Wetlands Mapper, 2015). Therefore, the proposed project would not have an adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, because no listed species are known or expected to occur at the project site.

d) ***LESS THAN SIGNIFICANT IMPACT***. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species.

As described above, the project site is developed and there are no known nests and no native biological habitat on-site and it is unlikely that the project would present a significant impact on biological resources. However, the project site contains non-native trees and other non-native landscaping that would be removed as part of the project. The trees and shrubs within the project site provide potentially suitable nesting habitat for a variety of bird species that are afforded protection under the federal Migratory Bird Treaty Act (MBTA – 16 United States Code Section 703-711) and California Fish and Game Code (CFGC) Section 3503. Due to the limited number of existing larger trees and shrubs, the proposed project has minimal potential to impact migratory and other bird species. Nevertheless, construction-related disturbance could result in nest abandonment or premature fledging of the young. The proposed project would be required to comply with the MBTA 16 United States Code Section 703-711, CFGC Section 3503, and mitigation measure BIO-1 to avoid construction-related disturbance of nesting birds. Following compliance with MBTA and CFGC requirements, and mitigation measure BIO-1, impacts would be less than significant.

BIO-1 **Nesting/Breeding Native Bird Protection.** To avoid impacts to nesting birds, all initial ground disturbing activities, including tree removal, shall be limited to the time period between August 16 and January 31 (i.e., outside the nesting season) if feasible. If initial site disturbance, grading, and vegetation removal cannot be conducted during this time period, a pre-construction survey for active nests within the project site shall be conducted by a qualified biologist at the site no more than two weeks prior to any construction activities. If active nests are identified, species specific exclusion buffers shall be determined by the biologist, and construction timing and location adjusted accordingly. The buffer shall be adhered to until the adults and young are no longer reliant on the nest site, as determined by the biologist. Limits of construction to avoid a nest shall be established in the field with flagging and stakes or construction fencing. Construction personnel shall be instructed on the sensitivity of the area.

Because Measure BIO-1 would clearly mitigate the potential for impacts to nesting birds, further analysis of this issue in an EIR is not warranted.

e) ***LESS THAN SIGNIFICANT IMPACT***. For the purpose of this Initial Study, a project-related significant adverse effect could occur if the project would cause an impact that is inconsistent with local regulations pertaining to biological resources. The City adopted a Native Tree Protection Ordinance (Ord. 177,404) in 2006. This ordinance protects trees with trucks four inches in diameter at 4.5 feet above ground level for the following tree species: native oak trees (*Quercus* species including scrub oak), California sycamore (*Platanus racemosa),* California bay laurel (*Umbellularia californica*), and Southern California black walnut (*Juglans californica*). Under the ordinance, removal of a protected tree requires a tree removal permit from the City's Board of Public Works. A protected tree report is required prior to the removal or relocation of trees. The Board also has the authority to require mitigation as a condition of granting a permit. Mitigations may include tree replacement or relocation (City of Los Angeles Native Tree Protection Ordinance, 1996). The proposed project would involve removal of the mature landscape trees on the project but would not involve the removal of any trees that are protected under the City's Native Tree Protection Ordinance.

In addition, LAMC Section 62.169 requires a permit in order to prune, remove, or plant any native or non-native tree or shrub in any City street (i.e., within the public right of way associated with the street). The proposed project would involve removal of street trees on the sidewalks adjacent to the project site in order to repave the sidewalks. The developer would be required to obtain approval and permits to remove street tress in accordance with LAMC Section 62.169. Further analysis of this issue in an EIR is not warranted.

f) ***NO IMPACT***. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if the project would be inconsistent with mapping or policies in any conservation plans of the types cited.

The project site is not located within an area that is subject to an adopted conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Further analysis of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES				
-- Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	■	☐
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §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 formal cemeteries?	☐	☐	☐	■

a) ***LESS THAN SIGNIFICANT IMPACT.*** Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources which presently exist within the project site. Pursuant to Section 15064.5 of the *State CEQA Guidelines*, a historical resource is presumed significant if it is listed on the California Register of Historic Resources (California Register) or has been determined to be eligible for listing by the State Historical Resources Commission (SHRC). A historical resource may also be considered significant if the lead agency determines, based on substantial evidence, that the resource meets the criteria for inclusion in the California Register. CEQA also contains the following additional guidelines for defining a historical resource:

- California properties formally determined eligible for, or listed in the National Register of Historic Places (Section 5024.1.d.1);
- Those resources included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code, or identified as significant in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code;
- Those resources that a lead agency determines to be historically significant (generally, if it meets criteria for listing on the California Register), provided the determination is supported by substantial evidence; or
- Those resources a local agency believes are historical for more broadly defined reasons than identified in the preceding criteria.

The *L.A. CEQA Thresholds Guide* further states that a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Los Angeles Municipal Code ordinance no. 183312 requires that a Notification of Demolition be mailed to all abutting property owners and the Council District Office of the site for which demolition has been proposed for any buildings greater than 45 years old based on the date the application is submitted. Ordinance no. 183312 also requires the applicant to post a public notice of the application for demolition pre-inspection in a conspicuous place near the entrance of the property. The existing post office was built in 1963 and is 52 years old; however, Section 91.106.4.5.5 exempts all buildings or structures with plans to be demolished as part of a project that is subject to CEQA review. Considering this project is being reviewed under CEQA, the requirements under ordinance no. 183312 does not apply.

A resource is eligible for listing on the California Register of Historical Resources if it meets any of the criteria for listing, which are:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c)).

The project site is developed with a post office, a commercial building, and surface parking lots. It has not been identified by Survey LA or listed on any local register or historic resources survey (Los Angeles Historic Resources Inventory). The post office is a concrete tilt-up building and does not embody distinctive design. It is not associated with significant events or the lives of significant persons. The buildings would not be considered for listing on the CRHP. Further analysis of this issue in an EIR is not warranted.

b, c) ***LESS THAN SIGNIFICANT IMPACT***. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project would:

- Disturb archaeological resources which presently exist within the Project Site.
- Disturb paleontological resources or geologic features which presently exist within the project site.

The project site is located in an urbanized area that has been previously disturbed by past activities, specifically construction of existing on-site structures. Given that the project site has been substantially disturbed by previous construction, any archaeological or paleontological resources that may have existed at one time likely have been previously unearthed, collected, and/or destroyed. In addition, disturbed soils typically eliminate the original stratigraphic/geologic context for paleontological and archaeological resources so that they are therefore not considered "significant" or "unique." The likelihood for unknown archaeological resources, paleontological resources, or unique geologic resources to be present within the area of proposed disturbance is low. Therefore, impacts to archaeological and paleontological resources would be less than significant without mitigation. Further analysis of this issue in an EIR is not warranted.

d) ***LESS THAN SIGNIFICANT IMPACT***. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project would disturb previously interred human remains.

The project site is developed and does not contain any evidence of human remains, however, grading and excavation is necessary and may reveal new information. Adherence to Section 7050.5(b) of the California Health and Safety Code would protect any previously unidentified buried human remains. In accordance with these codified requirements, in the event that human bone or bone of unknown origin is found during construction, all work is required to stop in the vicinity of the find and the County Coroner must be contacted immediately. If the remains are determined to be Native American, the Coroner is required to notify the Native American Heritage Commission, who then notifies the person it believes to be the most likely descendent. The most likely descendant would work with the contractor to develop a program for re-internment of the human remains and any associated artifacts. Further analysis of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. 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	☐	☐	■	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. GEOLOGY AND SOILS				
-- Would the project:				
other substantial evidence of a known fault?				
ii) Strong seismic ground shaking?	☐	☐	■	☐
iii) Seismic-related ground failure, including liquefaction?	☐	■	☐	☐
iv) Landslides?	☐	☐	☐	■
b) Result in substantial soil erosion or the loss of topsoil?	☐	■	☐	☐
c) Be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	■	☐
d) Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, 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?	☐	☐	☐	■

a.i and ii) ***LESS THAN SIGNIFICANT IMPACT***. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of these specific issues, a significant impact may occur if:

- A project site is located within a state-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed; or
- A proposed project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the southern California region.

The Alquist-Priolo Act requires the State Geologist to map active earthquake fault zones. Exhibit A of the City of Los Angeles General Plan Safety Element illustrates that the proposed

project site is not located with an Alquist-Priolo Special Study Zone or Fault Rupture Study Area.

No faults have been mapped across the project site; however, similar to all of Southern California, active and/or potentially active faults in the region could generate strong ground shaking on the project site. According to the City of Los Angeles General Plan Safety Element (adopted 1996) there have been 60 damaging seismic events in the Los Angeles region since 1800. The U.S. Geological Survey has estimated the probability of a ten to thirty percent potential for a 7.5 or more magnitude quake along the southern portion of the San Andreas Fault within the next five to thirty years.

The proposed project would involve the replacement of existing retail structures with newer structures. These newer facilities must be constructed in compliance with modern building codes, including the Los Angeles Building Code (LABC), which adopts the California Building Code by reference in Chapter IX, Article 1, Section 91.1010.1 of the Los Angeles Municipal Code (LAMC). The California Building Code (Title 24, California Code of Regulations) contains seismic safety provisions with the aim of preventing building collapse during a design earthquake, so that occupants would be able to evacuate after the earthquake. A design earthquake is one with a two percent chance of exceedance in 50 years, or an average return period of 2,475 years. Adherence to these requirements would reduce the potential of the building from collapsing during an earthquake, thereby minimizing injury and loss of life. Although structures may be damaged during earthquakes, adherence to seismic design requirements would minimize damage to property within the structure because the structure is designed not to collapse. Replacement of existing older buildings with new, more durable structures that adhere to current regulatory mandates would generally reduce the potential for property damage during a seismic event. Further analysis of this issue in an EIR is not warranted.

a.iii) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED***. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project.

Liquefaction is a condition that occurs when unconsolidated, saturated soils change to a near-liquid state during ground shaking. The project site is located in Liquefiable Area according to Exhibit B, Areas Susceptible to Liquefaction, of the City of Los Angeles General Plan Safety Element (1996), which includes recent alluvial deposits and groundwater less than 30 feet deep. Likewise, a review of the State of California Seismic Hazard Zone Map for the Canoga Park Quadrangle (Department of Conservation, 1998) also indicates that the site is located in an area designated as having the potential for liquefaction (Geocon, 2015).

Pursuant to Los Angeles Municipal Code Section 91.7006.2 and California Building Code (CBC) Section 1803, a geotechnical report is required for the proposed project. The geotechnical report was completed by Geocon West, Inc. and evaluated the risk of liquefaction, among other

geologic risks, on the project site. The Design Earthquake (DE) and the Maximum Considered Earthquake (MCE) Ground Motion Empirical Estimation of Liquefaction Potential were measured. DE is the level of ground motion that has a 10% chance of exceedance in 50 years, with a statistical return period of 475 years. MCE is the level of ground motion that has a 2% chance of exceedance in 50 years, with a statistical return period of 2,500 years.

Liquefaction analysis of the site determined that the alluvial soils below the historic high groundwater level could be susceptible to approximately 2.4 inches of liquefaction settlement during DE ground motion. This calculation uses the historic high groundwater table of 27 feet below the ground surface, a magnitude 6.77 earthquake, and a peak horizontal acceleration of 0.449g ($2/3PGA_M$). The MCE peak ground motion analysis determined that the alluvial soils below the historic high groundwater level could be susceptible to less than 2.7 inches of liquefaction. This calculation uses the historic high groundwater table of 27 feet below the ground surface, a magnitude 6.80 earthquake, and a peak horizontal acceleration of 0.673g ($2/3PGA_M$). Multiple recommendations are provided in the geotechnical investigation to reduce foundational and building design risk, including recommendations regarding: general project construction; soil and excavation; minimum resistivity, pH, and water-soluble sulfates; grading; controlled low strength material (CLSM); shrinkage; mat foundation design; foundation settlement; lateral design; exterior concrete slabs-on-grade; preliminary pavement; retaining wall design and drainage; dynamic (seismic) lateral forces; swimming pool design; elevator pit and piston design; temporary excavations; slot cutting; shoring; stormwater infiltration; surface drainage; and plan review (Geocon, 2015). In addition, the CBC includes specific requirements for foundation design in liquefaction areas. The proposed project would be required to comply with applicable provisions of the most recently adopted version of the CBC and the City's building regulations. Adherence to these regulations and mitigation measure GEO-1 would reduce liquefaction impacts to a less than significant level. Further analysis of this issue in an EIR is not warranted.

GEO-1 **Geotechnical Engineering Study Requirements.** The project design, site preparation, and construction shall incorporate and implement all of the provisions, as outlined in Section 7 of the Geotechnical Investigation Study prepared by Geocon West, Inc., dated June 2, 2015. These include but are not limited to:

- Based on the potential for liquefaction affecting the site, and the resulting potential for liquefaction-induced settlement, the proposed structure shall be designed for a combined static and seismically induced differential settlement of 2/3 inch over a distance of 30 feet, with the central and easternmost residential structures being designed for a combined static and seismically induced differential settlement of 1.3 inches over a distance of 30 feet.
- Remove the upper six feet of existing soils within the proposed on-grade building footprint, and properly compact it for foundation and slab support.
- Excavate and remove all existing fill and soft alluvial soils.

- Based on the potential for liquefaction affecting the site, and the resulting potential for liquefaction-induced settlement, a mat foundation shall be utilized for support of the proposed structures. The mat foundation shall be underlain by a minimum of three feet of newly placed compacted fill.
- Utilize a seismic separation or flexible connection where the apartment structures and parking structure may be attached.
- Utilize flexible utility connections for all rigid utilities.
- Construct the parking structure prior to residential structures in order to allow the majority of static settlement to take place in the parking structure and help minimize differential settlements between the two structures.

a.iv) ***NO IMPACT***. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, 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.

The project site is flat. According to Exhibit C (Landslide Inventory & Hillside Area) of the City of Los Angeles General Plan Safety Element the project site is not located in a landslide or hillside area. Therefore, no landslide impacts would occur. Further analysis of this issue in an EIR is not warranted.

b) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED***. 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. The project site is currently developed and paved. Upon completion of the proposed project there would not be a substantial amount of exposed soil such that there is no risk for substantial soil erosion or top soil. Construction activities have the potential to expose surficial soils to wind and water erosion. However, as noted in the Air Quality discussion above, the proposed project would have to comply with SCAQMD Rule 403 regarding incorporation of measures to reduce fugitive dust, which would also help reduce the potential for construction related erosion (SCAQMD Rule 403(d)(2)). SCAQMD Rule 403, Table 1, provides measures for construction activities to reduce fugitive dust. This includes measures for the application of water or stabilizing agents to prevent generation of dust plumes, pre-watering materials prior to use, use of tarps to enclose haul trucks, stabilizing sloping surfaces using soil binders until vegetation or ground cover effectively stabilize slopes, hydroseed prior to rain, and washing mud and soils from equipment at the conclusion of trenching activities (See SCAQMD Rule 403, Table 1, for additional details). Water erosion would also be prevented during construction activities through the City's standard erosion control practices required pursuant to the California Building Code and the National Pollution Discharge Elimination System (NPDES), such as silt fencing or sandbags. Construction activities would be required to comply with the General Construction Activities Stormwater Permit (GCASP) approved by the State Water Resources Control Board by Water Quality Order 99-08-DWQ. Because the project site is currently developed with a post office and office building, is flat (reducing the potential for high speed stormwater flows during construction), would comply with SCAQMD Rule 403,

and the project would not increase storm flows during operations above existing conditions, project development would not have the potential to cause substantial erosion or the loss of topsoil. Further analysis of this issue in an EIR is not warranted.

While compliance with GCASP and SCAMND Rule 403 would reduce potential effects to less than significant levels, the *L.A. CEQA Thresholds Guide* includes the following mitigation measure, which would be included in the project to further reduce potential erosion effects to less than significant.

GEO-2 **Erosion Control.** The proposed project shall implement measures to reduce erosion during construction. These may include, but are not limited to:

- Establish an erosion control plan prior to construction;
- Revegetate cleared areas as soon as feasible after grading or construction with temporary seeding, permanent seeding, mulching, stabilization, vegetative buffer strips, protection of trees, or other soil stabilization practices; reduce sedimentation by using detention basins, straw bale dikes, silt fences, earth dikes, brush barriers, velocity dissipation devices, drainage swales, check dams, subsurface drains, pipe slope drains, level spreaders, storm drain inlet protection, rock outlet protection, sediment traps, temporary sediment basins, or other controls; and
- Incorporate permeable paving materials that permit water penetration.

c, d) ***LESS THAN SIGNIFICANT IMPACT.*** Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if:

- A project is built in an unstable area without proper site preparation or design features to provide adequate foundations for proposed buildings, thus posing a hazard to life and property; or
- The 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.

Unstable soils may include soils that are subject to lateral spreading, subsidence, liquefaction, or collapse. Subsidence is the sudden sinking or gradual downward settling of the Earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities, which include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydrocompaction. Lateral spreading is the horizontal movement or spreading of soil toward an open face. The potential for failure from subsidence and lateral spreading is highest in areas where the groundwater table is high and where relatively soft and recent alluvial deposits exist. Lateral spreading hazards may also be present in areas with liquefaction risks. As mentioned in Section (a.iii), the project site is within a liquefaction zone. Therefore, the project applicant would be required to

prepare and adhere to the recommendations of a geotechnical report that complies with CBC requirements related to these areas.

Expansive soils are generally clays, which increase in volume when saturated and shrink when dried. Expansive soils may be present on the project site. CBC Section 1808.6 requires special foundation design for buildings constructed on expansive soils. If the soil is not removed or stabilized, then foundations must be designed to prevent uplift of the supported structure or to resist forces exerted on the foundation due to soil volume changes or shall be isolated from the expansive soil. Compliance with CBC requirements would protect structures and occupants from hazards involving expansive soils. Further analysis of this issue in an EIR is not warranted.

e) ***NO IMPACT***. Although not specified in the *L.A. CEQA Thresholds Guide*, this question would apply to the project only if it was located in an area not served by an existing sewer system. The project site is already connected to the City's sewer and wastewater disposal system and the proposed project would not involve the use of septic tanks. Further analysis of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. 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 any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	■	☐	☐

Climate change is the distinct change in measures of climate for a long period of time. Climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Natural changes in climate can be caused by indirect processes such as changes in the Earth's orbit around the Sun or direct changes within the climate system itself (i.e. changes in ocean circulation). Human activities can affect the atmosphere through emissions of greenhouse gases (GHGs) and changes to the planet's surface. Human activities that produce GHGs are the burning of fossil fuels (coal, oil, and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock, deforestation activities; and some agricultural practices.

GHGs differ from other emissions in that they contribute to the "greenhouse effect." The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the Sun hits the Earth's surface and warms it. The surface in turn

radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth's temperature. GHGs occur naturally and from human activities. Greenhouse gases produced by human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over by 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Emissions of GHGs affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way the Earth absorbs gases from the atmosphere.

According to the California Energy Commission's (CEC) Draft Climate Action Team Biennial Report, potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years.

Regulatory Framework

In response to an increase in man-made GHG concentrations over the past 150 years, California has implemented AB 32, the "California Global Warming Solutions Act of 2006." AB 32 requires achievement by 2020 of a statewide GHG emissions limit equivalent to 1990 emissions (essentially a 25% reduction below 2005 emission levels) and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. Based upon the California Air Resources Board (ARB) *California Greenhouse Gas Inventory for 2000-2012* (http://www.arb.ca.gov/cc/inventory/data/data.htm), California produced 458.68 MMT CO_2E in 2012.

The project would be required to comply with the Los Angeles Green Building Code (Ordinance no. 181480), California Green Building Standards Code (Part 11 of Title 24, California Code of Regulations), and California Energy Code (Tit. 24, Cal. Code Reg., Part 6). The proposed project would be required to install energy efficient lighting fixtures consistent with the requirements of the 42 U.S.C. § 17001 et seq. California also implements the Renewable Portfolio Standard (Pub. Utilities Code § 399.11 et seq.). As a result of this requirement, the electricity provider for the project, Southern California Edison (SCE), currently procures 20% of its electricity from renewable sources (SCE website, 2015). Pursuant to SBX1 [2011] SCE will be required to provide 33% of their electricity with renewable sources by the year 2020. Additionally, The City of Los Angeles also has a Green Building Program (Ordinance no. 179820) which was approved on April 22, 2008. The ordinance applies to both residential and commercial buildings including residential buildings over 50,000 square feet. The ordinance states that covered new buildings must demonstrate that the project meets the criteria for LEED certified level certification.

April 8th 2015, the City of Los Angeles released pLAn, a sustainability plan for the City of Los Angeles. The plan covers a multitude of environmental, social, and economic sustainability issues. Many of the sustainability plan goals and actions relate to GHG reduction either specifically or by association. Actionable goals include increasing the green building standard for new construction, create benchmarking policy for building energy use, develop "blue, green, and black" waste bin infrastructure, reduce water use by 20%, and possibly require LEED Silver or better new construction. Likewise, Executive Order B-30-15 issued by Governor Brown established a GHG reduction of 40% below 1990 levels by 2030 in California (State of California, 2015).

a, b) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED.*** Generally, the evaluation of an impact under CEQA requires measuring data from a project against a "threshold of significance" (CEQA Guidelines Section 15064.7). Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" [CEQA Guidelines Section 15064.7(c)]. For GHG emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact.

Section 15064.4 of the revised CEQA Guidelines that became effective on March 18, 2010 states:

(b) A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:

(1) The extent to which the project may increase or reduce greenhouse gas emissions as 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 a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

According to Appendix G of the *CEQA Guidelines*, a project could have a significant environmental impact if it would:

- Generate greenhouse gas 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 greenhouse gases.

As such, the project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the *CEQA Guidelines* or Appendix G to the *CEQA Guidelines* as set forth above.

Project construction and operation would generate GHG emissions through the burning of fossil fuels or other emissions of GHGs, thus potentially contributing to cumulative impacts related to global climate change. However, the proposed project would replace older construction with new modern structures that would be developed in a manner consistent with California Green Building Standards, the City of Los Angeles Green Building Code and Program, and would include a number of green building design features to further reduce energy and water use. In addition, the proposed project would place residential uses within walking distance to retail, restaurants, jobs, and alternative transportation. Therefore, impacts related to GHG emissions are expected to be less than significant with mitigation; nevertheless, this issue will be further analyzed in the EIR.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. 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 ¼ mile of an existing or proposed school?	☐	☐	☐	■
d) Be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	■	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS				
-- Would 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 result in a safety hazard for people residing or working in the project area?	☐	☐	☐	■
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	■
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
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?	☐	☐	☐	■

a) ***LESS THAN SIGNIFICANT IMPACT***. According to the *L.A. CEQA Thresholds Guide*, the determination of significance with respect to human health hazards shall be made on a case-by-case basis considering the following factors:

- The regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people or property from exposure to the health hazard; and,
- The degree to which project design will reduce the frequency or severity of consequences of exposure to a health hazard.

The proposed project would not introduce, or locate people adjacent to any of the uses/facilities described above. The proposed project would involve replacement of an existing post office and office building with residential uses. The proposed residential uses would not involve the routine transport, use or disposal of hazardous substances, other than minor amounts typically used for maintenance.

The project would include demolition of existing on-site structures which, due to their age, may contain asbestos and lead-based paints and materials (Rincon Consultants, Inc., 2014). However, the removal of any asbestos-containing materials would be required to comply with all

applicable existing rules and regulations, including SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). SCAQMD Rule 1403 requires work practices that limit asbestos emissions from building demolition and renovation activities, including the removal and disturbance of ACM. This rule is designed to protect uses and persons adjacent to demolition or renovation activity from exposure to asbestos emissions. Rule 1403 requires surveys of any facility being demolished or renovated for the presence of all friable and Class I and Class II non-friable ACM. Rule 1403 also establishes notification procedures, removal procedures, handling operations, and warning label requirements, including HEPA filtration, the glovebag method, wetting, and some methods of dry removal that must be implemented when disturbing appreciable amounts of ACM (more than 100 square feet of surface area). In addition, the proposed project would be required to comply with California Occupational Safety and Health Administration (CalOSHA) regulations regarding lead-based materials. The California Code of Regulations, §1532.1, requires testing, monitoring, containment, and disposal of lead-based materials, such that exposure levels do not exceed CalOSHA standards. Further analysis of this issue in an EIR is not warranted.

b) ***LESS THAN SIGNIFICANT IMPACT***. According to the *L.A. CEQA Thresholds Guide*, a determination of significance regarding risk of upset/emergency preparedness should be made on a case-by-case basis considering the following factors:

- The regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and,
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

As discussed in subpart (a) of this Section, the proposed project would not use or manage potentially hazardous or explosive substances. The proposed project involves residential use and would not require a new, or interfere with an existing, emergency response or evacuation plan. Further analysis of this issue in an EIR is not warranted.

c) ***NO IMPACT***. Though not specified in the *L.A. CEQA Thresholds Guide*, the project would have a significant impact if it would emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within ¼ mile of an existing or proposed school.

As discussed in subsection (a, b), the proposed project would not emit hazardous materials with compliance with existing regulations. In addition, the closest school to the project site is the Woodland Hills Private School, located approximately 0.35 miles northwest of the project site. There would be no impact related to the release of hazardous materials within ¼ mile of a school. Further analysis of this issue in an EIR is not warranted.

d) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED***. Though not specified in *L.A. CEQA Guidelines Thresholds*, a project would normally have a significant impact if it would be located on a site that is included on a list of hazardous material sites compiled

pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

Rincon Consultants, Inc. prepared a Phase I Environmental Site Assessment (ESA) in September 2014 (see Appendix I). A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR) as part of the Phase I ESA (Rincon Consultants, Inc., 2014). The 22121 Clarendon Street portion of the project site was listed on the following databases searched by EDR:

- **Leaking Underground Storage Tank (LUST)**: According to the EDR report, a UST was removed from the project site in 1990 and an unauthorized release of gasoline was discovered to have occurred to the soil and groundwater. One 5,000-gallon capacity UST was formerly utilized to store gasoline for the purpose of fueling post office vehicles. The EDR report indicates that preliminary site assessment and pollution characterization began in 1991. Three groundwater monitoring events are reported to have occurred in November 1996, August 1997 and November 1997. Post remedial action monitoring is reported to have begun in 1996. The remedial action is not reported. The EDR report indicates that during the August 1997 groundwater monitoring event, Methyl Tertiary Butyl Ether (MTBE) was detected at concentrations up to 69 micrograms per liter (µg/L) in the groundwater samples. The MCL for MTBE in drinking water is 5 µg/L. According to the EDR report and the SWRCB GeoTracker website, the LUST case was closed in January 1998. No additional pertinent information was provided by EDR or identified on the GeoTracker website.
- **Recovered Government Archive Leaking Underground Storage Tank (RGA LUST)**: EDR reported that the project site was listed in the RGA LUST database from 1992 to 2012. No additional pertinent information was provided by EDR.
- **Hazardous Waste Information System (HAZNET)**: EDR reported that the subject property was a hazardous waste generator in 1994, 1995, 1996, 1997 and 2006. Hazardous waste that was generated at the subject property included waste oil and mixed oil, unspecified oil-containing waste, and aqueous solutions, polychlorinated biphenyls (PCBs) and material containing PCBs. Hazardous wastes that were generated were reported at quantities ranging from 0.2 tons to 2.17 tons and were removed and recycled by a certified handler. No additional pertinent information was provided by EDR.
- **Statewide Environmental Evaluation and Planning System Underground Storage Tank (SWEEPS UST)**: No information was reported by EDR for the project site listed on the SWEEPS UST database. These underground storage tank listings were updated and maintained by a company contracted by the SWRCB in the early 1980s. This database contains a historical listing of active and inactive UST locations. The

listing is no longer updated or maintained. The local agency is the contact for more information on a site on the SWEEPS list. As part of this Phase I ESA we requested to review environmental records maintained by the Los Angeles Fire Department (LAFD) Underground Tanks Division and the Los Angeles RWQCB. A summary of our review of the LAFD records is described below.

- **Historical Cortese (HIST CORTESE):** No pertinent information was reported by EDR for the project site listed on the HIST CORTESE database. This historical listing includes sites designated by the State Water Resources Control Board (LUST), the Integrated Waste Board - Solid Waste Information System (SWIS), and the Department of Toxic Substances Control (CALSITES). CALSITES contains information on Brownfield properties with confirmed or potential hazardous contamination. The SWIS records contain an inventory of solid waste disposal facilities or landfills. These may be active or inactive facilities or open dumps that failed to meet RCRA Section 4004 criteria for solid waste landfills or disposal sites.
- **California Facilities Inventory Database Underground Storage Tank (CA FID UST)**: EDR reported that the status of the UST at the project site is inactive. No additional pertinent information is provided in this listing.
- **Historical Underground Storage Tank (HIST UST)**: EDR reported that one 5,000 gallon UST was located at the project site (22121 Clarendon St.) that contained waste. No additional pertinent information was provided in this listing.

Based on this information, the Phase I ESA included an evaluation of LAFD and Los Angeles Regional Water Quality Control Board (RWQCB) documents. The documents indicate that two USTs were formerly located to the west of the US Postal Service structure. However, the records maintained by the LAFD and Los Angeles RWQCB only document the removal and assessment of one 10,000- gallon UST from the site. Following removal of the UST, soil samples collected from beneath the UST did not have elevated concentrations of TPH or BTEX. The Los Angeles RWQCB granted case closure for the UST in 1998.

Based on this records search, the Phase I ESA identified the following recognized environmental conditions:

- Known volatile organic compound (VOC) contamination in groundwater beneath project site: groundwater contamination is present beneath the project site in the vicinity of the former USTs and fuel pump; however, the origin or source of the contamination is not defined. In addition, according to the 2013 Annual Groundwater Monitoring Report for the Former Curran Cleaners site located about 480 feet to the south of the subject property, there is evidence of PCE in the groundwater originating at the Former Curran Cleaners site and extending beneath portions of the subject property. VOCs in groundwater pose the potential to migrate into the soil vapor and present a vapor intrusion risk to indoor air.
- Potential presence of an underground storage tank (UST): Documents indicate that two USTs were formerly located to the west of the post office; however, only documents show only one as being removed. The second UST may have been removed from the site, but documents describing the removal were not identified. In addition, information regarding the size of the UST, contents of the UST, date of installation or removal, and soil assessment [if any] in the vicinity of the UST was not provided in the records maintained by the LAFD and Los Angeles RWQCB.

Additional analysis would be needed to determine whether the second UST was removed from the site, to determine the extent of VOC pollution in the groundwater below the project site, and identify necessary mitigation measures to ensure safe residential use of the site. Therefore, the following mitigation measure would be included in the project to further reduce potential impacts associated with the identified RECs to a less than significant level.

HAZ-1 Prior to initiating grading activities, a soil and soil vapor assessment shall be completed by a registered soils engineer or remediation specialist to determine the on-site presence or absence of regulated contaminants that may be present or have migrated from off-site properties. This assessment shall target TPH contamination associated with the on-site USTs and PCE vapors associated with off-site dry cleaning operations. If soil or soil vapor sampling indicates the presence of any contaminant in hazardous quantities, the Regional Water Quality Control Board (RWQCB) and Los Angeles County Fire Department (LACFD) shall be contacted by the project applicant or authorized agent thereof to determine the level of any necessary remediation efforts, and these soils and/or groundwater shall be remediated in compliance with applicable laws. Site assessments that result in the need for soil excavation are required to include: an assessment of air impacts and health impacts associated with excavation activities; identification of any applicable local standards that may be exceeded by the excavation activities, including dust levels and noise; transportation impacts from the removal or remedial activities; and risk of upset practices should an accident occur at the site. A copy of applicable remediation certification from RWQCB and/or LACFD, or written confirmation that a certification is not required shall be submitted to the City of Los Angeles.

Impacts related to the identified RECs are expected to be less than significant with mitigation; nevertheless, this issue will be further analyzed in the EIR.

e, f) ***NO IMPACT***. A significant impact may occur if a project:

- Is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.
- Were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard.

The airport closest to the project site is the Van Nuys airport located approximately seven miles to the northwest. The project site is not located within an airport influence area[1]. Therefore, no impact related to airport safety would occur. Further analysis of this issue in an EIR is not warranted.

[1] *Los Angeles County, Department of Regional Planning. Los Angeles County Airport Land Use Plan. October, 2004. Retrieved from: http://planning.lacounty.gov/view/alup/*

g) ***NO IMPACT***. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if:

- The project would require a new or revised risk management plan, emergency response, or emergency evacuation plan.
- A project involved possible interference with an emergency response plan or emergency evacuation plan.

The City of Los Angeles Department of Emergency Management is responsible for the development of citywide emergency plans. The proposed project would include replacement of commercial buildings with a residential project. The proposed project would not interfere with the City's emergency plans developed by the Department of Emergency Management. Further analysis of this issue in an EIR is not warranted.

h) ***NO IMPACT***. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if the project site is located in proximity to wildland areas and poses a significant fire hazard, which could affect persons or structures in the areas in the event of a fire.

The project site is within a developed part of Woodland Hills and does not include wildlands or high fire hazard terrain or vegetation. Additionally, according to the City of Los Angeles General Plan Safety Element Exhibit D, the project site is not located within a wildfire hazard area. Further analysis of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY				
-- Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	■	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or 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)?	☐	☐	■	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY				
-- Would the project:				
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 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 hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	■
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	■
i) 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?	☐	☐	☐	■
j) Result in inundation by seiche, tsunami, or mudflow?	☐	☐	☐	■

a, e, f) ***LESS THAN SIGNIFICANT IMPACT.*** Based upon criteria in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose

of this specific issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems.

The project site is currently developed and paved. The proposed project would replace existing development. Any project site with a total area over one acre is subject to the provisions of the General Construction Activity Stormwater Permit adopted by the State Water Resources Control Board (SWRCB). The project applicant must submit a Notice of Intent (NOI) to the SWRCB for coverage under the Statewide General Construction Activity Stormwater Permit and must comply with all applicable requirements, including the preparation of a SWPCP, applicable NPDES Regulations, and best management practices (BMPs). The SWPCP must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of the construction site before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement additional control where necessary.

Operational activities would have to comply with numerous modern regulatory requirements, which would result in a reduction stormwater flows off-site. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency has established regulations under the NPDES program to control both construction and operation (occupancy) stormwater discharges. In California, the State Water Quality Control Board administers the NPDES permitting program and is responsible for developing permitting requirements (see subsection VI(b) above for additional details). The project would be required to comply with the NPDES permitting system. The Los Angeles Regional Water Quality Control Board (LARWQCB) adopted the latest Municipal Separate Storm Sewer System (MS4) NPDES Permit in December 2012. The MS4 permit requires new development and redevelopment projects to incorporate stormwater mitigation measures. Under the conditions of the permit, the project applicant would be required to eliminate or reduce non-stormwater discharges to waters of the nation, develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for the project construction activities, and perform inspections of the stormwater pollution prevention measures and control practices to ensure conformance with the site SWPPP. The state permit prohibits the discharge of materials other than stormwater discharges, and prohibits all discharges that contain a hazardous substance in excess of reportable quantities established at 40 Code of Federal Regulations (CFR) 117.3 or 40 CFR 302.4. The state permit also specifies that construction activities must meet all applicable provisions of Sections 30 and 402 of the Clean Water Act (CWA). Conformance with Section 402 of the CWA would ensure that the proposed project does not violate any water quality standards or waste discharge requirements.

The developer of the project would also be required to comply with various sections of the LAMC that regulate water quality and stormwater. These include:

- LAMC Sections 12.40-12.43, Landscape Ordinance;
- LAMC Sections 64.70.01, Stormwater and Urban Runoff Pollution Control Ordinance; and

- LAMC Section 64.72, Stormwater Pollution Control Measures for Development Planning and Construction Activities.

With compliance with applicable state, regional, and City policies and regulations described above (General Construction Permit, MS4 permit, CWA, City stormwater ordinances), the proposed project would not significantly impact water quality. Further analysis of this issue in an EIR is not warranted.

b) ***LESS THAN SIGNIFICANT IMPACT.*** Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would:

- Change potable water levels sufficiently to:
    - Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought;
    - Reduce yields of adjacent wells or well fields (public or private); or
    - Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction in groundwater recharge capacity

As discussed in Section XVII, *Utilities and Service Systems*, the proposed project would receive its water supply from the Los Angeles Department of Water and Power (LADWP). Approximately 12% of LADWP's water supply comes from local groundwater. The City owns water rights in the San Fernando, Sylmar, Eagle Rock, Central, and West Coast Basins. However, LADWP does not exercise its pumping rights in the Eagle Rock or West Coast Basin at this time. All of these basins are adjudicated by decree through Superior Court Judgments (LA UWMP, 2010). The adjudicated basin limits groundwater pumping to safe yield amounts (safe yield based upon a calculation of rate of groundwater replenishment). Therefore, the proposed project would not result in an exceedance of safe yield or a significant depletion of groundwater supplies. Further analysis of this issue in an EIR is not warranted.

c) ***LESS THAN SIGNIFICANT IMPACT***. A significant impact may occur if a project would substantially alter drainage patterns resulting in a significant increase in erosion or siltation during construction or operation of a project.

Because the project site is generally flat and already developed, changes to the hydrological conditions of the site would be minimal and impacts to the existing drainage pattern or surface runoff as a result of the project would be minimal. In addition, as discussed above in subpart (a, e, f), the Los Angeles County MS4 permit requires that all post-development stormwater runoff shall not exceed the predevelopment peak flow.

The project would not alter the course of any stream or other drainage, would not increase the potential for flooding, and would not result in increased erosion (as described in greater detail in Section VI(b)). As discussed above, adherence to the City's urban runoff programs and implementation of design features to capture and treat stormwater runoff would reduce the quantity and level of pollutants within runoff leaving the site. Further analysis of this issue in an EIR is not warranted.

d) ***LESS THAN SIGNIFICANT IMPACT***. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would:

- Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

The project site is urbanized and almost entirely covered with impervious surfaces, and would remain so under the proposed project. Therefore, the project would not substantially alter surface runoff from the site. In addition, the project would be required to comply with the NPDES Multiple Separate Storm Sewer System (MS4) Permit issued by the Los Angeles Regional Water Quality Control Board, which would require implementation of Best Management Practices (BMPs). BMPs would be required to reduce polluted runoff from the project site by retaining, treating, or infiltrating polluted runoff on-site. Further, as discussed in parts (a, e, f) of this section, the proposed project would be required to develop a Site Specific Mitigation Plan to reduce the quantity of runoff from the project site. Further analysis of this issue in an EIR is not warranted.

g-h) ***NO IMPACT***. Although not specified in the City of Los Angeles LA CEQA Thresholds Guide 2006, a significant impact may occur if:

- The project was to place housing in a 100-year flood zone; or
- The project was located within a 100-year flood zone, which would impede or redirect flood flows.

According to the Federal Emergency Management Agency (FEMA), the project site is located in Zone X, which is characterized by a minimal risk of flooding and located outside the 100-year flood hazard area (FEMA FIRM # 06037C1290F, 2008). According to Exhibit F of the City of Los Angeles General Plan Safety Element, the project site is not within a 100-year of 500-year flood plain. Therefore, development of the proposed project would not expose people or structures to significant flood hazards and would not impede or redirect flood flows. Further analysis of this issue in an EIR is not warranted.

i) ***NO IMPACT***. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam.

There are no dams or levees located in the vicinity of the project site. The project site is not located in an Inundation Area according to Exhibit G of the Los Angeles General Plan Safety Element. Further analysis of this issue in an EIR is not warranted.

j) ***NO IMPACT***. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

According to the Exhibit G of the Los Angeles General Plan Safety Element, the project site is not within an area potentially impacted by a tsunami. The project site is not in proximity to a large body of water therefore would not be subject to inundation by seiche. Additionally, the project site is not located near a hillside area and would not be susceptible to mudslides or mudflows. Further analysis of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
X. LAND USE AND PLANNING				
-- Would the project:				
a) Physically divide an established community?	☐	☐	☐	■
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	■	☐	☐
c) Conflict with an applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	■

a) ***NO IMPACT.*** A significant impact may occur if the project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

The project site is located on a developed parcel within an urbanized area in the Woodland Hills neighborhood in the City of Los Angeles. The proposed project would not create a physical barrier that would divide an established community. The proposed project would preserve the local vehicular circulation system and, thus, would not physically divide an established community. Further analysis of this issue in an EIR is not warranted.

b) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED.*** A significant impact may occur if the project is inconsistent with the General Plan or zoning designations

currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

The project site is designated for Community Commercial land use in the City's General Plan. The project site is also within the Ventura/Cahuenga Boulevard Corridor Specific Plan area and has a Specific Plan designation of Community Commercial under the Specific Plan. The Community Commercial land use designation permits both commercial uses, as well as multi-family residential development through corresponding zoning designations of CR, C2, C4, RAS3, and RAS4.

Government Code Section 65860 requires that counties, general law cities, and charter cities with populations of more than two million maintain consistency between their zoning ordinance and their adopted general plan (§65860). While the project site is presently used for Community Commercial purposes, it is not zoned consistently with its General Plan and Specific Plan Community Commercial designations. The site is presently zoned R1-1VL, [Q]CR-1VLD, and P-1VLD. The applicant is requesting a zone change to [T][Q]RAS4-1L in order to build the proposed project. This would provide uniform zone classification on the site and make it consistent with the General Plan. The [Q] condition limitation would impose conditions to mitigate adverse environmental effects of the zone change identified in the EIR prepared for this project (12.32(G)(2)(j)).

The Residential Accessory Services 4 (RAS4) Zone designation permits multi-family development or mixed use development at a 1 dwelling unit for every 400 sf of lot area (108 units per acre). With a zoning designation of RAS4 consistent with the project site's Community Commercial General Plan designation, the project site could be developed with a maximum of 465 units. Development included in the project would be limited to 335 apartments comprised of studios, 1 bedroom units, 2 bedroom units, and 3 bedroom units to provide housing opportunities for differently-sized households. The 335 units included as part of the proposed project would be less than the maximum allowed in the RAS4 designation.

The Specific Plan permits a maximum floor area ratio (FAR) of 1.25:1 and a maximum height of 45 feet. The project's proposed FAR of 2.1:1 and proposed building height of 56 feet would exceed the Specific Plan FAR and height limitations. As such, a waiver of development standards, pursuant to a density bonus with a set-aside of 5% very low income units, i.e. 17 units, is requested to address the exceedance of the permitted floor area and height limitations.

The California Air Resources Board's (ARB's) Air Quality and Land Use Handbook: A Community Health Perspective (April 2005) recommends against siting sensitive receptors within 500 feet of a freeway. The project is located within 500 feet of a freeway. Mitigation

measures included in Section III, *Air Quality* would reduce diesel particulates impacts associated with the Project's proximity to the freeway to a less than significant level. Nonetheless, this subject will be further studied in the EIR prepared for the project. This subject will be further studied in the EIR prepared for the project, which may identify additional mitigation measures.

c) ***NO IMPACT***. Although not specified in the City of Los Angeles LA CEQA Thresholds Guide 2006, a project-related significant adverse effect could occur if the project site were located within an area governed by a habitat conservation plan or natural community conservation plan.

As discussed in Section IV. (f), the project site is not located within an area that is subject to an adopted habitat conservation plan or natural community plan. Further analysis of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XI. 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?	☐	☐	☐	■

a-b) ***NO IMPACT.*** Although not specified in *the LA CEQA Thresholds Guide*, a significant impact may occur if the project site is located in an area used or available for extraction of a regionally-important or locally-important mineral resource, or if the project development would convert an existing or future regionally-important or locally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important or locally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

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

The project site is a not located in an area designated as Oil Drilling District or Surface Mining District by Los Angeles City Comprehensive Zoning Ordinance. Additionally, the project does

not involve the use or mining of mineral resources. Further analysis of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XII. NOISE				
-- Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	■	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	■	☐	☐
c) A substantial permanent increase in ambient noise levels above levels existing without the project?	☐	■	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	■	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use 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?	☐	☐	☐	■

Noise Characteristics

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Because of the logarithmic scale of the decibel unit, sound levels are not added or subtracted arithmetically. If a sound's physical intensity is doubled, the sound level increases by 3 dB, regardless of the initial sound level. For example, 60 dB plus 60 dB equals 63 dB, 80 dB plus 80 dB equals 83 dB. However, where ambient noise levels are high in comparison to a new noise source, there will be a small change in noise levels. For example, 70 dB ambient noise levels are combined with a 60 dB noise source the resulting noise level equals 70.4 dB. In general, humans find a change in sound level of 3 dB is just noticeable.

Noise that is experienced at any receptor can be attenuated by distance or the presence of noise barriers or intervening terrain. Sound from a single source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. For acoustically absorptive, or soft, sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receiver, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receiver specifically to reduce noise. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dB of noise reduction.

a) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED***. Although not specified in *LA CEQA Thresholds Guide*, a significant impact may occur where a project would not comply with the City of Los Angeles General Plan Land Use Compatibility Standards for Noise or the City of Los Angeles Noise Ordinance (Municipal Code Ordinance No. 144,331).

The project site is located adjacent to the US Highway 101. Freeway noise is audible at the project site. The proposed project would involve placing residential uses near a freeway noise source and may not comply with the City of Los Angeles General Plan Land Use compatibility Standards for Noise. Impacts are expected to be less than significant with mitigation, and will be further analyzed in the EIR.

Included below are mitigation measures that shall be used to reduce freeway noise. These mitigation measures are required for the proposed project and include:

N-1 **Noise Reduction Measures.** The proposed project shall implement the following measures to reduce freeway noise levels during operation. These may include, but are not limited to:

- All on-site residential structures facing US Highway 101 shall include windows and exterior doors that have a minimum STC rating of 30 STC or higher. Exterior doors shall be solid core and be installed with weather stripping.
- All on-site residential structures facing US Highway 101 shall include exterior wall assemblies shall have a STC rating of 45 or higher. This can be accomplished using standard wall assemblies

using 2 by 4 inch studs, batt insulation in the wall cavities, and a double-layer of half-inch drywall on each side, or using staggered 2 by 4 inch studs with 2 by 6 inch top and bottom plates and a single-layer of half-inch drywall on each side. Other methods of achieving STC 45 in exterior wall assemblies can be found at:
    - inspectapedia.com/BestPractices/Sound_Control3.htm
    - www.stcratings.com/assemblies.html
    - www.sae.edu/reference_material/pages/STC%20Chart.htm.
- During project design, locate vegetated landscaping areas, including native trees and shrubs, between US Highway 101 and future noise-sensitive uses on site. Vegetated landscaping areas shall be reflected on the project landscaping plan, which shall be approved by the City Planning Department.
- All on-site residential structures facing US Highway 101 shall be provided with forced-air mechanical ventilation, as required by the California Building Code, to adequately ventilate the interior space of the units when windows are closed to control noise.

However, the project would include noise reduction measures that would reduce interior residential noise levels attributable to exterior noise sources to below the land use compatibility levels of 45 db in all habitable room. The project's outdoor common open space areas would be shielded from the freeway by the building structure. The EIR would study exterior anticipated exterior noise levels for compliance with the City's Land Use Compatibility Standards for noise. Impacts are expected to be less than significant with mitigation, and will be further analyzed in the EIR.

b) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED.*** The City of Los Angeles has not adopted any thresholds for groundborne vibration impacts. Therefore, this analysis uses the Federal Transit Administration's vibration impact thresholds for sensitive buildings. These thresholds are 85 VdB at residences and buildings where people normally sleep (e.g., nearby apartments). Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB) in the U.S.

The proposed project would involve construction activities such as demolition, asphalt removal, grading, and excavation activities. Approximately 4,745 cubic yards of cut (CY) and 11,367 CY of fill are anticipated with the proposed project. Construction activities are anticipated to result in some vibration that affect nearby residential sensitive receptors. Operation of the proposed project would not perceptibly increase groundborne vibration or groundborne noise on the project site above existing conditions, due to the proposed mixed-use nature of the project. Due to the presence of sensitive noise receptors approximately 50 feet from the project site (the Warner Pointe apartments south of the project site), groundborne vibration could affect these sensitive receptors. However, in accordance with Section 41.40 of the LAMC no construction activity (including grading) that would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, would occur as part of the project

between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. Additionally, all such activities are also prohibited on Sundays and all federal holidays. Impacts are expected to be less than significant with mitigation, and will be further analyzed in the EIR.

c) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED***. A significant impact may occur if the project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the project. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would typically have a significant impact on noise levels from project operations if the project would increase the ambient noise levels by 3 dBA CNEL at the property line of homes where the resulting noise level would be at least 70 dBA CNEL or at the property line of commercial buildings where the resulting noise level is at least 75 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact.

As discussed in Section XVI, *Transportation/Traffic,* trips to and from the project site would decrease with development of the proposed project. Therefore, local traffic noise levels would decrease for nearby receivers.

Other noise sources associated with operation of the proposed project may be periodically audible at adjacent uses. Noise events that are typical of residential developments include music, conversations, and children playing. On-site operations are expected to also involve noise associated with rooftop ventilation, heating systems, and trash hauling.

General noise that would be associated with the proposed parking garage includes the movement of vehicles through the garage, the slamming of doors, conversations, and similar activities. It is anticipated that these noises would be reduced due to the placement of most of these activities within the parking garage. Impacts are expected to be less than significant with mitigation, and will be further analyzed in the EIR.

d) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED.*** A significant impact may occur if the project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the project. Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact from noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA [CNEL] or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA [CNEL] or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5dBA [CNEL] at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.

The project could generate temporary noise increases during construction. Temporary noise increases would result from demolition and removal of the existing on-site buildings and surface parking lots currently located on the site, grading and trenching for the proposed

structure, construction of the structure, and traffic noise from construction vehicles. The noise sensitive receptors closest to the project site are the Warner Pointe apartments located approximately 50 feet south of the project site boundary across Clarendon Street. As shown in Table 6, noise levels on the project site could reach 89 dBA at 50 feet from the source during construction (FHWA, 2006).

Table 6
Typical Noise Levels at Construction Sites

Equipment On-site	Average Noise Level at 50 Feet
Air Compressor	81 dBA
Backhoe	80 dBA
Concrete Mixer	85 dBA
Dozer	82 dBA
Saw	76 dBA
Scraper Laying	89 dBA

Source: FHWA, 2006

Temporary noise levels shown in Table 6 could affect sensitive receptors near the project site, particularly the multi-family residential uses located 50 feet southeast of the project site. The City's construction noise CEQA criteria anticipate that a certain level of construction noise above ambient noise levels is acceptable for limited periods of time and during certain hours. Mitigation measures should substantially reduce potentially adverse construction noise.

To reduce potential noise impacts, the following mitigation measure from the *L.A. CEQA Thresholds Guide* will be incorporated into the Project:

N-1 **Construction Noise.** The proposed project shall implement measures to reduce noise during construction. These may include, but are not limited to:

- Use noise control devices, such as equipment mufflers, enclosures, and barriers. Natural and artificial barriers such as ground elevation changes and existing buildings can shield construction noise.
- Stage construction operations as far from noise sensitive uses as possible;
- Avoid residential areas when planning haul truck routes;
- Maintain all sound-reducing devices and restrictions throughout the construction period;
- Replace noisy equipment with quieter equipment (for example, a vibratory pile driver instead of a conventional pile driver and rubber-tired equipment rather than track equipment); and
- Change the timing and/or sequence of the noisiest construction operations to avoid sensitive times of the day.

With mitigation, we expect temporary construction noise impacts would be reduced to a less than significant level. This topic will be analyzed further in the EIR.

e, f) ***NO IMPACT***. The project site is not within an airport land use plan or within two miles of a public or private airport. The airport closest to the project site, Van Nuys Airport, is located approximately seven miles to the northwest. Therefore, the proposed project would not expose people to excessive noise levels related to airports for people living or working at the project site and its vicinity, and the project would have no impact in this regard. Further consideration of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. 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?	☐	☐	☐	■

a) ***LESS THAN SIGNIFICANT IMPACT***. The development of 335 residential units on the project site would provide housing to accommodate existing demand as well as new population. The proposed project aligns with the residential goals and objectives outlined in the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan (City of Los Angeles, 1999). The Community Plan outlines the main goal as establishing a safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the Community Plan Area (CPA). Specifically, Objective 1-2, 1-4, and 1-5 apply to the proposed project. Objective 1-2 aims to reduce automobile trips in residential areas by locating new housing in areas offering proximity to goods, services, and facilities. Direct access to US Highway 101, public transportation, and pedestrian and bikeways provides ample access to the population, while minimizing the negative impacts of population growth. Objective 1-4 aims to provide a diversity of housing opportunities capable of accommodating all persons regardless of income, age, or ethnic background; and objective 1-5 intents to limit the intensity and density of residential development in hillside areas (City of Los Angeles, 1999).

Using the California Department of Finance (DOF) average household size for Los Angeles of 2.85 persons, the increase of 335 dwelling units could generate an average resident population

of 955 persons (335 units x 2.85 persons/unit). The current City population is approximately 3,904,657, according to the most recent (May 2014) DOF estimate. The 2008 Woodland Hills population was approximately 63,414, based on Los Angeles Department of City Planning estimates (City of Los Angeles Department of Planning, 2015). Therefore, the proposed project could result in a citywide population of approximately 3,905,612 persons (3,904,657 + 955), with approximately 64,409 (63,414 + 955) residents in Woodland Hills (City of Los Angeles Department of Planning, 2015). SCAG projects that the population of Los Angeles will be 3,991,700 in 2020 (SCAG, 2012). The level of population increase potentially associated with the proposed project is within the population forecast and the physical environmental impacts associated with this increased population growth have been addressed in the individual resources sections of this Initial Study. Because the project would not substantially increase population above anticipated growth, and the physical environmental impacts associated with the project have been addressed in the individual resources sections of this Initial Study, impacts related to population growth would be less than significant. Further consideration of this issue in an EIR is not warranted.

b, c) ***NO IMPACT***. The project site currently contains a post office, an office building, and parking areas. The proposed project would not involve demolition of any residential units. Thus, the project would not displace housing units or people, or necessitate the construction of replacement housing. Further consideration of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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?	☐	☐	■	☐

a.i) ***LESS THAN SIGNIFICANT IMPACT***. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

The Los Angeles Fire Department (LAFD) provides fire protection services in Los Angeles. The site would be served by Fire Station #84, located at 21050 Burbank Boulevard, approximately one mile northeast of the site (LAFD Find Your Station webpage, accessed March 2015; Captain Albarran, LAFD, personal communication, 2015). Other stations would respond to emergencies at the project site as needed. Development of the proposed project would incrementally increase demand for fire protection services compared to existing conditions due to the addition of 335 residential units. The LAFD would review site plans, site construction, and the actual structure prior to occupancy to ensure that required fire protection safety features in accordance with LAMC Chapter V, Article 7 (Fire Protection and Prevention) are implemented. Development with modern materials and in accordance with current standards, inclusive of fire resistant materials, fire alarms and detection systems, automatic fire sprinklers, would enhance safety from fire in comparison to the existing older units that would be removed, and would support fire protection services (Title 24, California Code of Regulations Part 9). The proposed project would not affect fire protection services such that new or altered fire protection facilities are

needed, the construction of which could have an environmental impact. Further consideration of this issue in an EIR is not warranted.

a.ii) ***LESS THAN SIGNIFICANT IMPACT.*** For the purpose of this Initial Study, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. Based on the *L.A. CEQA Thresholds Guide* the determination of whether the project results in a significant impact on police protection shall be made considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

The LAPD provides police protection services in the City. The closest police station to the project site is the Topanga Community Police Station located at 21501 Schoenborn Street in Canoga Park, approximately four miles north of the site (LAPD website, accessed March 2015). The proposed project would incorporate security measures. These measures may include, but are not limited to: controlled gate access for pedestrians and vehicles, security cameras, and safety lighting. The project would incrementally increase the demand for police protection services compared to existing conditions due to the addition of approximately 955 new residents (See Section XIII, *Population and Housing* for further detail). However, this increase would not significantly affect the Police Department's ability to respond to emergency situations or substantially decrease the level of service in the City, thereby resulting in the need to construct new facilities (Senior Lead Officer Rygh, personal communication, 2015). The project would not require the construction of new or physically altered police protection facilities which could have an environmental impact. Further consideration of this issue in an EIR is not warranted.

a.iii) ***LESS THAN SIGNIFICANT IMPACT***. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the schools serving the project site.

The Los Angeles Unified School District (LAUSD) would provide public school service for the project. The proposed project would involve 335 new residential units (see Section XIII, *Population and Housing*). The proposed project would be served by Woodland Hills Charter Elementary (K-5), Woodland Hills Academy (6-8) and William Howard Taft Charter High School (9-12) (LAUSD school finder, 2015). Based on LAUSD's student generation rates (see Table 7), the proposed project would generate an estimated 43 elementary school students, 24 middle school students, and 23 high school students.

Table 7
Student Generation Rates

Type of Use	Quantity	Generation Factor	Students Generated
Multi-Family Residential	335 units	0.1266 Elementary School (K-5) Students Per Unit	43
		0.0692 Middle School (6-8) Students Per Unit	24
		0.0659 High School (9-12) Students Per Unit	23
Total Students			**90**

Source: City of Los Angeles, Barlow Hospital Replacement and Master Plan Project Draft EIR, April 2012. Available: http://planning.lacity.org/eir/BarlowHospital/DEIR/DEIR/IV.K.3_Schools.pdf, accessed April 2015.

In accordance with State law the applicant would be required to pay school impact fees. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Thus, payment of the development fees is considered full mitigation for the proposed project's impacts under CEQA**.** Further discussion of this issue in an EIR is not warranted.

a.iv) ***LESS THAN SIGNIFICANT IMPACT***. A significant impact to parks may 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 proposed project would involve the addition of 955 residents and would increase the demand for use of existing parks in the City. As described in greater detail in Section XV, *Recreation,* the project would NOT increase demand on parks and recreational facilities to the extent that they would suffer substantial physical deterioration or that new park facilities would need to be built to accommodate the demand. Further discussion of this issue in an EIR is not warranted.

a.v) ***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, which would exceed the capacity available to serve the project site, necessitating a new or physically altered public facilities, the construction of which would have significant physical impacts on the environment.

The proposed project would contribute incrementally toward impacts to City Public Services and facilities such as storm drain usage (discussed in Section IX, *Hydrology and Water Quality*), public parks (discussed above in this section), solid waste disposal (discussed in Section XVII, *Utilities and Service Systems*), and water usage and wastewater disposal (discussed in more detail in Section XVII, *Utilities and Service Systems*). The project's contribution would be offset through the project specific features described in the individual resource section analyses described in this Initial Study.

The proposed project would involve removal of a USPS post office building. USPS is planning on establishing an alternative site for the existing post office prior to the current lease termination, and does not expect to impact the neighboring postal facilities through any consolidations (R. Tappia, USPS, personal communication, June 8, 2015). Therefore, USPS services would not be significantly affected such that additional post office buildings beyond the replacement site would be needed. The proposed project would not result in any additional impacts that have not been analyzed in the other resource areas of this Initial Study. Further discussion of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XV. RECEATION				
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?	☐	☐	■	☐

a, b) ***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 park or recreational facilities that would exceed the capacity of existing parks and causes premature deterioration of the park facilities; or
- Includes the construction or expansion of park facilities, the construction of which would have a significant adverse effect on the environment.

The proposed project would involve the development of 335 residential units and add approximately 955 new residents (See Section XIII, *Population and Housing* for further detail). This has the potential to increase demand for recreational facilities. A number of City park facilities are located within a short distance of the project site. These include Warner Ranch Park and the Woodland Hills Recreation Center. The proposed project would also include recreational facilities, including courtyards, a pool, and a gym and would comply with the City's open space ordinance. The project would not increase demand on parks and recreational facilities to the extent that they would suffer substantial physical deterioration or that new park facilities would need to be built to accommodate the demand. In addition, the City of Los Angeles has established a Zone Change Park Fee (LAMC Section 12.33) which would apply to the Project. The Zone Change Park Fee is intended to provide the City with financial resources to support the provision of park facilities to serve new population. The planning of park

facilities is conducted on a citywide basis and is independent of CEQA analysis for individual development projects. Accordingly, a less than significant impact is expected. Further discussion of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC				
-- Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	■	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	■	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	■
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	■	☐
e) Result in inadequate emergency access?	☐	☐	■	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?	☐	☐	■	☐

a, b) ***LESS THAN SIGNIFICANT IMPACT.*** The following is based on information in the Trip Generation Analysis prepared by Linscott, Law & Greenspan, Engineers (LLG) in May 2015 (see Appendix A).

Traffic Assessment

According to the *L.A. CEQA Thresholds Guide*, a proposed project would normally have a significant intersection on intersection capacity if the project traffic causes an increase in the volume to capacity (V/C) ratio on the intersection operating condition after the addition of project traffic of one of the following:

- V/C ratio increase >0.040 if final LOS is C
- V/C ratio increase >0.020 if final LOS is D
- V/C ratio increase >0.010 if final LOS is E or F

LADOT's traffic study guidelines[2] require that a formal traffic study or technical memorandum be prepared based on the following:

1. A Technical Memorandum is required when the project is likely to add 25 to 42 AM or PM peak hour trips, and the adjacent intersection(s) are presently estimated to be operating at LOS E or F.
2. A Traffic Study is required when the project is likely to add 500 or more daily trips, or likely to add 43 or more AM or PM peak hour trips.

Existing Trip Generation

In order to review the characteristics and level of overall existing site traffic generation, weekday manual peak hour turning movement traffic counts were conducted at the existing site. Specifically, manual driveway traffic counts were conducted at the six existing site driveways on an hourly basis (in 15-minute time increments) from 7:00 AM to 10:00 AM and from 3:00 PM to 6:00 PM for three consecutive weekdays in July 2014. Through conduct of these counts, the number of existing vehicle trips entering and exiting the site during the peak hours can be determined, and when compared to the existing square footages, site-specific trip generation rates can be derived for the site.

The traffic count data for the six site driveways was compiled, reviewed, and analyzed to determine the highest one hour period of traffic volume at the site during both the weekday morning and afternoon periods. The peak hour traffic generation and derived trip generation rates associated with the existing uses are presented below:

- USPS Retail Store and Distribution Center
    - AM peak hour: 383 trips (12.92 trips per 1,000 square feet)
    - PM peak hour: 623 trips (21.02 trips per 1,000 square feet)
- Office Building
    - AM peak hour: 14 trips (1.28 trips per 1,000 square feet)
    - PM peak hour: 9 trips (0.82 trips per 1,000 square feet)

By combining the two land use components above, the site-specific surveys produced an AM peak hour site-wide trip generation of 397 AM peak hour vehicle trips and 632 PM peak hour vehicle trips.

[2] *Traffic Study Policies and Procedures, City of Los Angeles Department of Transportation, June 2013.*

For comparison and informational purposes, traffic volumes expected to be generated by the existing buildings to be removed from the project site were also estimated using rates published in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*1. The ITE trip generation rates are as follows and the trip generation forecast for the existing uses employing these rates are summarized below:

- ITE Land Use Code 732: United States Post Office
  - AM peak hour: 244 trips (8.23 trips per 1,000 square feet)
  - PM peak hour: 333 trips (11.22 trips per 1,000 square feet)
- ITE Land Use Code 710: General Office Building
  - AM peak hour: 17 trips (1.56 trips per 1,000 square feet)
  - PM peak hour: 16 trips (1.49 trips per 1,000 square feet)

By combining the two land use components above, application of the ITE trip generation rates to the existing land uses produced a site-wide trip generation of 261 AM peak hour vehicle trips and 349 PM peak hour vehicle trips.

As shown above, the actual vehicle trip generation associated with the existing uses is higher than those estimated through application of the ITE trip generation rates. Thus, the use of the lower ITE trip generation rates for traffic analysis purposes ensures that potential traffic impacts are not underestimated and can be considered conservative.

Project Trip Generation

Traffic volumes expected to be generated by the proposed project during the AM and PM peak hours, as well as on a daily basis, were estimated using rates published in the ITE *Trip Generation Manual*. Traffic volumes expected to be generated by the residential component of the proposed project were based upon rates per number of residential units (ITE Land Use Code 220: Apartment).

The trip generation forecast associated with the proposed project is summarized in Table 8.

Table 8
Project Trip Generation

Land Use	Size	Average Daily Trips	AM Peak Hour Trips	PM Peak Hour Trips
Proposed Project				
Apartment	335 units	2,228	171	208
Existing Uses				
U.S. Post Office	29,638 sf	(3,207)	(244)	(333)
Office	10,929 sf	(121)	(17)	(16)
Subtotal Existing Uses		*(3,328)*	*(261)*	*(349)*
Net Change		(1,100)	(90)	(141)

Source: LLG 2014, see Appendix A
( ) denotes subtraction

The proposed project would result in a net decrease of 1,142 daily trips, 93 AM peak hour trips and 129 PM peak hour trips. As the proposed project would result in a net decrease in vehicle trips, the proposed project would be below the thresholds outlined in the City's traffic study guidelines for preparing a formal traffic study. This topic will be analyzed further in the EIR.

The proposed project would be adjacent to US Highway 101, which is designated a scenic highway by the General Plan. In the *Aesthetics* section we have evaluated the proposed project utilizing the established guidelines for designated scenic highways in the Transportation Element of the City of Los Angeles General Plan. The proposed project is consistent with the guidelines and would not impact the existing view from US Highway 101. Therefore, further analysis of this issue in an EIR is not warranted.

c) ***NO IMPACT***. As discussed in Section VIII, *Hazards and Hazardous Materials*, the project site is located about seven miles from the nearest airport (Van Nuys Airport) and is not located within a designated fly zone or airport influence area. Further consideration of this issue in an EIR is not warranted.

d, e) ***LESS THAN SIGNIFICANT IMPACT.*** A significant impact may occur if the proposed project:

- Includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area;
- Includes site access or other features designed in such a way as to create hazard conditions; or
- 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 site is currently accessible via Clarendon Street and Glade Avenue. The proposed project would be accessed via two driveways on Clarendon Street that would lead to the parking structure. An additional fire lane/access point would be provided from Clarendon on the western boundary of the site. The project would not result in any new roadways, alter site access, or result in levels of traffic congestion that would impede emergency access as the proposed project does not involve any new development. The proposed project would meet all LAFD site access requirements. Further consideration of this issue in an EIR is not warranted.

f) ***LESS THAN SIGNIFICANT IMPACT.*** For the purpose of this Initial Study, a significant impact may occur if the project would conflict with adopted polices or involve modification of existing alternative transportation facilities located on- or off-site.

The proposed project involves construction of a multi-family residential use on a currently developed site. The proposed project would be limited to site-specific improvements and would not damage the performance or safety of any public transit, bikeway, or pedestrian facilities. Conversely, the proposed project would maintain the quality of the pedestrian environment with landscaping along Clarendon Street. The project site is transit-accessible and within walking distance of Metro Lines 150/240, 161, 169, 245/244, and 750. Sidewalks are provided

along all key roadways in the project site vicinity and pedestrian crosswalks with walk lights are provided at signalized intersections in the project area. The proposed project would provide 369 bicycle parking spaces. The project would have no impact with respect to adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, and would not otherwise substantially reduce the performance or safety of such facilities. Further consideration of this issue in an EIR is not warranted.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. 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 storm water 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?	☐	☐	■	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	■	☐

a, b, e) ***LESS THAN SIGNIFICANT IMPACT.*** For the purpose of this Initial Study, a significant impact may occur if a project:

- Would discharge wastewater, whose content exceeds the regulatory limits established by the governing agency;
- Would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded; or
- Would increase wastewater flows as such that a sewer or treatment plant's is constrained or would become constrained.

Wastewater Collection and Conveyance

The Los Angeles Bureau of Sanitation (BOS) operates and maintains the City's wastewater infrastructure. The City's wastewater collection system serves over four million residential and business customers within a 600 square mile service area that includes Los Angeles and 29 contracting cities and agencies. Over 6,500 miles of public sewers connect to the City's four wastewater treatment and water reclamation plans that process an average of 550 million gallons of wastewater each day (BOS website, accessed 2015).

Table 9 shows the estimated wastewater generation associated with the proposed project.

The BOS performed a sewer capacity availability review for the proposed project (dated August 28, 2014). The BOS determined that there is capacity to handle the anticipated discharge from the proposed project.[3] Therefore, impacts related to wastewater collection systems would be less than significant. Further discussion of this issue in an EIR is not warranted.

Table 9
Estimated Wastewater Generation

Type of Use	Quantity	Generation Factor*	Amount (gpd)
Proposed			
Apartments (Studio)	51 units	80 gallons / unit / day	4,080
Apartments (1-bedroom)	133 units	120 gallons / unit/ day	15,960
Apartments (2-bedroom)	141 units	160 gallons / unit / day	22,560
Apartments (3-bedroom)	10 units	200 gallons / unit / day	2,000
		Subtotal	*44,600*
Existing			
U.S. Post Office	29,638 sf	150 gallons / 1000 sf / day	(4,445.7)
Office	10,929 sf	150 gallons / 1000 sf / day	(1,639.35)
		Subtotal	*(6,085.05)*
Net Increase in Wastewater Demand			**38,514.95**

** City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.*
Notes: gpd = gallons per day, sf = square feet, ( ) denotes subtraction

[3] *Note: the BOS analysis assumed generation of 40,700 gallons of wastewater per day. The proposed project is different than what was analyzed by BOS, but is under the 40,700 gallons calculated for the project by BOS. Therefore, the conclusion that there is available capacity applies.*

Wastewater Treatment

The City's BOS operates four treatment and water reclamation plants. The main purpose of these treatment facilities is to remove potential pollutants from Los Angeles' sewage in order to protect our river and marine environments and the public's health (LA sewers website, accessed 2015). Two of the wastewater treatment plants serve the project site: the Tillman Water Reclamation Plant (TWRP) and the Hyperion Treatment Plant (HTP). These plants meet all Los Angeles Regional Water Quality Control Board wastewater treatment requirements. The TWRP serves the western San Fernando Valley and is located in Van Nuys. The TWRP has a capacity of 80 million gallons per day (mgd) and is currently processing an average flow of 60 mgd (City of Los Angeles, Sewer System Management Plan, February 2015). Thus, the plant has a remaining daily capacity of approximately 20 mgd. The HTP serves the entire City (except the Harbor area) and contract cities and is located in Playa del Rey. The HTP is designed to treat up to 450 mgd per day and currently treats an average of 180 mgd (HTP employee, no name given, personal communication, 2015). Therefore, the HTP has a remaining capacity of approximately 270 mgd.

As shown in Table 9, the proposed project would generate a net increase of approximately 38,515 gallons of wastewater per day. This increase would be well within the existing unused capacity of the TWRP and HTP. In addition, the proposed project would replace older existing inefficient fixtures with modern more water efficient fixtures (e.g., low flow toilets) as required for new development under the California Plumbing Code (Title 24, Cal. Code Regs., Part 5, Chapter 4). Further discussion of this issue in an EIR is not warranted.

c) ***LESS THAN SIGNIFICANT IMPACT.*** A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities.

The proposed project would involve demolition of an existing post office and office building and parking areas and construction of a mixed-use development. As also discussed in Section IX, *Hydrology and Water Quality,* the project site is currently paved and thus impermeable. The overall surface stormwater quantity that would flow into the City's storm drain system would be the same compared to existing conditions. Further discussion of this issue in an EIR is not warranted.

d) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED.*** For the purpose of this Initial Study, a significant impact may occur if the project would increase water consumption to such a degree that new water sources would need to be identified.

The project site is located within the City of Los Angeles. The Los Angeles Department of Water and Power (LADWP) provides water within the City limits. LADWP water sources include: the Los Angeles Aqueducts (LAA) (average of 36%), local groundwater (average of 12%), and the Metropolitan Water District (MWD) (average of 52%) (UWMP, 2010).

Assuming that water use is 120% of wastewater generation, existing uses on site demand approximately 7,372.6 gallons per day or 8.3 acre feet per year (AFY). The proposed project would demand approximately 54,672 gallons per day, or 61.2 AFY. Therefore, net new water

demand associated with the proposed project would be approximately 47,299.4 gallons per day or 52.9 AFY.

Table 10 shows the service area reliability assessment for multiple dry years in the years 2016-2020 according to the City's Urban Water Management Plan (UWMP).

Table 10
Multiple Dry Years Water Supply and Demand

	2016	2017	2018	2019	2020
Total Demand (AFY)	647,100	661.200	675,400	644,600	665,100
Existing/Planned Supplies (AFY)	200,480	215,520	168,200	221,680	289,730
MWD Water Purchases	446,620	445,680	507,200	422,920	375,370
Total Supplies	647,100	661,200	675,400	644,600	665,100

Sources: Exhibit 11H, LADWP, 2010 Urban Water Management Plan (UWMP)

As shown in Table 10, LADWP projects that adequate water supplies will be available even in the multi-dry year scenario. Total demand in Table 10 was calculated based on the service area population. The population within the UWMP service area is expected to increase from 4,100,260 in 2010 to 4,467,560 in 2035. The population increases in the UWMP are based upon SCAG data (see UWMP). As discussed above, in Sections XIII(a), *Population and Housing,* this project would not exceed to the SCAG projected growth rates. Therefore, the population increase (and water demand increase) associated with the proposed project has been accounted for in the UWMP.

The Governor of California recently declared a drought state of emergency (CA.gov, 2014). In July 2014 and in response to recent drought conditions, the State Water Resources Control Board (SWRCB) adopted new water conservation regulations (Resolution 2014-0038), including select prohibitions for all water users and required actions for all water agencies. Local water agencies have responded with declarations that prohibit water users from filling pools and spas or restrict when or for how long users can irrigate landscaping. In February, 2015, the MWD reevaluated its water supplies and outlined scenarios that could require the agency to limit water deliveries by 5 to 10 percent by July 1, 2015 and prompt mandatory rationing during summer months. More recently, the California Department of Water Resources (DWR) announced that MWD's 15% State Water Project allocation would be increased to 20% in 2015. Despite this anticipated increase, MWD reiterated its commitment in March 2015 to carefully manage water supplies in case drought conditions continue to persist.

To increase water conservation, LADWP and MWD have implemented numerous programs, such as rebate programs to incentivize the use of water efficient fixtures and equipment for residences, businesses, industry, institutions, and large landscapes in southern California (MWD website, accessed March 9, 2015).

In order to reduce water use, the following mitigation measure from the *L.A. CEQA Thresholds Guide* is required for this project:

U-1 **Water Reduction.** The proposed project shall implement measures to reduce water use. These may include, but are not limited to:

- Incorporate a recirculating hot water system to reduce waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet. Use tankless water heaters;
- Retrofit other buildings within the City to offset the net water consumption induced by the proposed project;
- Use reclaimed water as a source for project irrigation systems;
- Set automatic irrigation systems to irrigate during early morning or evening hours to minimize water loss due to evaporation and reset to water less in cooler months and during rainfall season;
- Use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray;
- Practice xeriscaping that exceeds City requirements;
- Recycle all water used in cooling systems to the maximum extent possible;
- If a fleet will be maintained, incorporate a water recycling system in on-site facilities for washing vehicles; and
- Perform regular preventive maintenance on all pumps, valves, and piping, in the project's water system to minimize water waste.

No residual impacts would result from Mitigation Measure U-1. Because adequate water supplies are expected to serve the proposed project and Mitigation Measure U-1 would further reduce water use, supply impacts would be less than significant. However, in light of the current drought conditions, this topic will be analyzed further in the EIR.

f, g) ***LESS THAN SIGNIFICANT IMPACT***. For the purpose of this Initial Study, a significant impact may occur if the project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste or if a project would generate solid waste that was not disposed of in accordance with applicable regulations.

The City has enacted numerous waste reduction and recycling programs in order to comply with AB 939, which required every city in California to divert at least 50% of its annual waste by the year 2000 and be consistent with AB 341, which sets a 75% recycling goal for California by 2020. As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76% (City of Los Angeles, May 2013).

AB 939 also requires each county to prepare and administer a Countywide Integrated Waste Management Plan. For Los Angeles County, the County's Department of Public Works is responsible for preparing and administering the Los Angeles County Countywide Integrated Waste Management Summary Plan (Summary Plan) and the Countywide Siting Element (CSE). These documents were approved by the County, a majority of the cities within the County containing a majority of the cities' population, the County Board of Supervisors, and CalRecycle. The Summary Plan, approved by CalRecycle on June 23, 1999, describes the steps to

be taken by local agencies, acting independently and in concert, to achieve the mandated state diversion goal by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. The CSE, approved by CalRecycle on June 24, 1998, identifies how, for a 15-year planning period, the county and the cities within would address their long-term disposal capacity demand to safely handle solid waste generated in the county that cannot be reduced, recycled, or composted (County of Los Angeles, 2011). The CSE is in the process of being updated.

Various provisions of the LAMC also address solid waste recycling. The City of Los Angeles Space Allocation Ordinance (Ordinance No. 171687, August 6, 1997) sets requirements for the inclusion of recycling areas within individual development projects. In accordance with the Space Allocation Ordinance, all new multi-family residential development projects with four or more units shall provide an adequate recycling area or room for collecting and loading recyclable materials. The proposed project would be subject to the multi-family residential requirement.

The proposed project would involve the demolition of an existing post office and commercial office building. Demolition activities would generate solid waste. However, the City has adopted a C*onstruction and Demolition (C&D) Waste Recycling Ordinance* to assist in meeting the diversion goals of AB 939 and City of Los Angeles. The proposed project would be required to comply with this ordinance. All demolition waste generated by the proposed project would be required to be taken to a certified C&D waste processor. Many certified waste processors are located within with the City of Los Angeles. The closest processors to the project site are American Reclamation (4560 Doran Street, Los Angeles, approximately 20 miles east of the project site) and Simi Valley Landfill and Recycling Center (2801 Madera Road, Simi Valley, approximately 20 miles northwest of the project site). American Reclamation has a recycling rate of 70% and Simi Valley Landfill and Recycling Center has a recycling rate of 82% (LA Sanitation, 2015). C&D waste generated by the proposed project would be expected to be processed at one of these facilities. Any waste that cannot be recycled would be taken to the nearest landfill. Assuming that at least 70% of the project's waste is recycled (consistent with American Reclamation's recycling rate), only 30% of the waste would be sent to the landfill.

Solid waste collection in the City is managed by the City's Bureau of Sanitation. Table 11 summarizes the permitted daily throughput, estimated average waste quantities disposed, remaining capacity, and closure date for landfills near the project site. As shown, landfills that may serve the project site have a remaining capacity of over 11,000 tons per day.

As shown in Table 12, project development would result in a net increase of approximately 256 pounds, or 0.13 tons, per day. This would not exceed the existing daily capacity of any of the landfills identified in Table 11. This assumes a 76% diversion rate as described previously.

Table 11
Solid Waste Disposal Facilities

Facility	Permitted Daily Throughput (tons/day)	Average Daily Waste Quantities Disposed (tons/day)	Estimated Remaining Daily Capacity (tons/day)	Estimated Closure Date
Calabasas Landfill	3,500	604	2,896	2025
Sunshine Canyon City/County Landfill	12,100	7,221	4,879	2037
Chiquita Canyon Landfill	6,000	2,970	3,030	2019
Commerce Refuse-to-Energy Facility	1,000	363	637	N/A
TOTAL	**22,600**	**11,158**	**11,442**	**--**

Sources: Los Angeles County Countywide Integrated Waste Management Plan, 2012 Annual Report; CalRecycle, Solid Waste Information System Facility/Site Search: http://www.calrecycle.ca.gov/SWFacilities/Directory/search.aspx.
N/A = not available

Table 12
Estimated Solid Waste Generation

Land Use	Size	Generation Rate*	Total (lbs/day)	Total (tons/day)
Residential (Multi-family)	335 units	4 lbs / unit / day	1,340	0.67
Existing Office to be Removed	10,929 sf	0.006 lbs / sf / day	(66)	(0.03)
Existing Post Office to be Removed**	29,638 sf	0.007 lbs / sf / day	(207)	(0.10)
Total Net Solid Waste Generation Increase			**1,067**	**0.54**
Total Net Solid Waste Generation Increase Assuming 76% Diversion Rate			**256**	**0.13**

Notes: sf = square feet, lbs= pounds, ( ) denotes subtraction
** CalRecycle Waste Generation Rates, available at: http://www.calrecycle.ca.gov/wastechar/WasteGenRates/default.htm*
*** No post office generation rate listed, therefore "public/institutional" generate rate used.*

The proposed project would comply with federal, state, and local statutes and regulations related to solid waste, such as AB 939, the County Integrated Waste Management Summary Plan, and the City's recycling program. There is adequate landfill capacity in the region to accommodate project-generated waste. Based on the availability of landfill capacity project solid waste disposal needs can be adequately met without a significant impact on the capacity of the landfills. Further discussion of this issue in an EIR is not warranted.

With compliance with applicable recycling and solid waste disposal requirements, solid waste impacts are anticipated to be less than significant. However, the following mitigation measure from the *L.A. CEQA Thresholds Guide* will be incorporated into the project to further reduce impacts to less than significant effects:

U-2 **Solid Waste Reduction.** The proposed project shall implement measures to reduce solid waste generation. These may include, but are not limited to:

- Incorporate recycled content materials in building products, furnishings, and building maintenance;
- Recycle construction and demolition debris and California Redemption Value (CRV) generated during construction;
- Use mulching, composting, and grass-cycling on landscaped areas. Use xeriscaping or other low maintenance methods in landscape design;
- Develop a project recycling plan that includes the design and allocation of recycling collection and storage space in the project. As a result of the City's space allocation ordinance, the Los Angeles Municipal Code (LAMC) includes provisions for recycling areas or rooms in all new development projects and certain expansions;
- Incorporate a statement or brochure instructing occupants about source reduction, recycling, and procurement of recycled content materials into the ownership agreement, property management agreements, and tenant agreements;
- Institute an employee participation recycling program whereby employees are given individual containers/bins to separate newspaper, white, and/or colored paper for regular collection by recyclers;
- Educate residents about proper household hazardous waste collection programs;
- Institute employee education which would, through a series of brief educational sessions, outline various methods whereby employees can further contribute to methods of recycling/conservation in the office and home (e.g., contracting with firms for the purchase of recycled paper, use of two-sided reports, replacement of Styrofoam cups with coffee mugs); and
- Conduct an annual waste audit review to measure the effectiveness of the tenant education program and recycling collection activities. Use the results to improve the project recycling plan. Include:
    - A review of purchasing patterns to eliminate materials not compatible with the established waste diversion program;
    - A review of operating procedures which generate either large amounts of waste or non-recyclable materials;
    - A review of occupancy uses and activities;
    - The evaluation and expansion of recyclable materials to be included in a recycling program; and
    - A review of employee awareness of recycling program goals, procedures, and accomplishments, as well as evaluations and implementation of training for all project occupants.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, 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 that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	■	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	■	☐	☐

a) ***LESS THAN SIGNIFICANT IMPACT***. As noted in Section IV, *Biological Resources*, impacts to nesting birds would be less than significant and the project will incorporate Mitigation Measure BIO-1, which will ensure that potential impacts to nesting birds are avoided. As noted under Section V, *Cultural Resources*, the proposed project would redevelop a site currently used for a post office, commercial building and would not impact known cultural or historic resources. Potential impacts to important examples of the major periods of California history or prehistory would be less than significant.

b) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED.*** As described in Section XVI, *Transportation/Traffic*, the proposed project would result in a reduction in vehicle trips to and from the project site. Therefore, the proposed project would not contribute to a significant cumulative impact. Cumulative impacts with some of the resource areas have been addressed in the individual resource sections above, such as stormwater, wastewater, water supply, and solid waste (see Section XII, *Utilities and Service Systems)*. Some of the other resource areas were determined to have no impact and therefore would not contribute to cumulative impacts and did not warrant further analysis, such as mineral and agricultural resources. Cumulative impacts with respect to land use, air quality, GHG, hazards, and noise would be potentially significant unless mitigation is incorporated and will be addressed in an EIR.

c) ***POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED.*** In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed in the preceding responses, the proposed project would not result, either directly or indirectly, in adverse hazards related to traffic. However, air quality, noise, and impacts related to hazardous materials are potentially significant unless mitigation is incorporated and will be addressed in an EIR.

REFERENCES

Bibliography

California Air Resources Board, Ambient Air Quality Standards, June 2013. Available: http://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed March 2015.

California Department of Conservation, Division of Land Resource Protection, September 2011, *Los Angeles County Important Farmland 2010*.

California Department of Conservation, Division of Land Resource Protection, 2013, *Los Angeles County Williamson Act FY 2012/2013*. Available: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_12_13_WA.pdf, accessed March 2015.

California Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2014, with 2010 Census Benchmark. May 2014. Available: http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php, accessed March 2015.

California Department of Resources Recycling and Recovery (CalRecycle). Solid Waste Information System Facility/Site Search. Accessed March 2015. Available at: http://www.calrecycle.ca.gov/SWFacilities/Directory/search.aspx, accessed March 2015.

California Department of Resources Recycling and Recovery (CalRecycle).Waste Generation Rates for Commercial Uses, Residential Uses, and Service Establishments. Available at: http://www.calrecycle.ca.gov/wastechar/wastegenrate, accessed March 2015.

California Department of Transportation. California Scenic Highway Mapping System (September 7, 2011). Available online at: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, accessed March 2015.

State of California Department of Conservation. Seismic Hazard Zone Map, Canoga Park Quadrangle, 1998. Available at: http://gmw.consrv.ca.gov/shmp/download/quad/CANOGA_PARK/maps/ozn_canpk.pdf, accessed June 2015.

Geocon West, Inc. Geotechnical Investigation: Proposed Multi-Family Residential Development 22051-22147 Clarendon Street, Woodland Hills District, Los Angeles, California. June 2, 2015 (Document).

Federal Highway Administration (FHWA). 2006. FHWA Highway Construction Noise Handbook. (FHWAHEP-06-015; DOT-VNTSC-FHWA-06-02). August. http://www.fhwa.dot.gov/environment/construction_noise/handbook, accessed March 2015.

Linscott, Law & Greenspan, Engineers, Clarendon Street Apartments Project – Trip Generation Analysis, August 12, 2014. , accessed March 2015.

LA Sanitation, Waste Hauler Permit (aka AB 939 Compliance Permit) Program webpage. Available; http://www.lacitysan.org/solid_resources/strategic_programs/ab939/compliance_fee.htm, accessed March 2015.

Los Angeles, City of. Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan. Adopted August 17, 1999. Available: http://planning.lacity.org/complan/pdf/cpkcptxt.pdf, accessed June 2015.

Los Angeles, City of. L.A. CEQA Thresholds Guide, 2006. Available at: http://www.ci.la.ca.us/ead/programs/table_of_contents.htm, accessed March 2015.

Los Angeles, City of, "Zero Waste Progress Report," March 2013. Available: http://www.lacitysan.org/solid_resources/recycling/publications/PDFs/CLA_%20Zero_Waste_Progress_Report.pdf, accessed March 2015.

Los Angeles, City of, Municipal Code, Last Updated September 30, 2014. Available: http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc, accessed March 2015.

Los Angles, City of, Department of Public Works. Hyperion Treatment Plant webpage. Available: http://www.lacitysan.org/LASewers/treatment_plants/about/index.htm, accessed March 2015.

Los Angeles, City of, General Plan Safety Element. Adopted 1996. Available: http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed March 2015.

Los Angeles, City of, Ventura-Cahuenga Boulevard Specific Plan, as amended August 18, 2001. Available: http://planning.lacity.org/complan/specplan/pdf/ventura.pdf, accessed March 2015.

Los Angeles, City of, Barlow Hospital Replacement and Master Plan Project Draft EIR, April 2012. Available: http://planning.lacity.org/eir/BarlowHospital/DEIR/DEIR/IV.K.3_Schools.pdf, accessed April 2015.

Los Angeles, City of. General Plan Traffic Element. Avaialble: http://planning.lacity.org/cwd/gnlpln/TransElt/index.htm, accessed June 2015

Los Angeles Fire Department (LAFD), Find your station webpage. Available: http://www.lafd.org/, accessed March 2015.

Los Angeles Historic Resources Inventory. Historic Places LA. Available: http://www.historicplacesla.org/map, accessed June 2015.

Los Angeles Police Department (LAPD), "Topanga Community Police Station" webpage. Available: http://lapdtopanga.org/about-us/, accessed March 2015.

Rincon Consultants, Inc., Phase I Environmental Site Assessment, September 22, 2014.

Southern California Association of Governments. 2012. *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy.*

South Coast Air Quality Management District (SCAQMD). 2012 Air Quality Management Plan. Available at: http://www.aqmd.gov/aqmp/2012aqmp/index.htm, accessed March 2015.

South Coast Air Quality Management District. 1993 CEQA Air Quality Handbook.

South Coast Air Quality Management District, CEQA, Final Localized Significance Threshold Methodology, SCAQMD, June 2003. Available at: http://www.aqmd.gov/CEQA/handbook/LST/Method_final.pdf, accessed March 2015.

South Coast Air Quality Management District August 2008. *Draft AQMD Staff CEQA Greenhouse Gas Significance Threshold*. Available at: http://www.aqmd.gov/ceqa/handbook/GHG/2008/aug27mtg/GHGproposal_augmtg.pdf, accessed March 2015.

Southern California Edison (SCE), "Among the Nation's Leading Utilities for Renewable Energy," Available: https://www.sce.com/wps/portal/home/about-us/environment/renewable-power/!ut/p/b0/04_Sj9CPykssy0xPLMnMz0vMAfGjzOINLdwdPTyDDTz9Q4ItDTydPF0cA41cDQ0CDPQLsh0VARZXVQc!/, accessed April 2015.

State of California. Office of Governor Edmund G. Brown Jr. Available: http://gov.ca.gov/news.php?id=18938 , accessed June 2015

State Water Resources Control Board, Water Quality Order 99-08-DWQ, Available: http://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/finalconstpermit.pdf, accessed March 2015.

West Hollywood, City of, 2035 General Plan Final Environmental Impact Report. Available: http://www.weho.org/city-hall/download-documents/-folder-152, accessed March 2015.

Persons Contacted

Albarran, Captain, Los Angeles Fire Department, contacted on April 3, 2015.

Rygh, Brent, Senior Lead Office, Los Angeles Police Department, contacted on March 25, 2015.

Tappia, Ralph, District Finance Manager, United States Postal Service, contacted on June 8, 2015.

No name given, Hyperion Treatment Plant, contacted March 30, 2015.

Appendix A

Trip Generation Analysis

MEMORANDUM

To:	Mr. Jay Ross AMCAL Multi-Housing, Inc.	Date:	May 4, 2015
From:	Clare M. Look-Jaeger, P.E. Francesca S. Bravo Linscott, Law & Greenspan, Engineers	LLG Ref:	1-14-4084-1
Subject:	Clarendon Street Apartments Project – Trip Generation Analysis		

LINSCOTT LAW & GREENSPAN engineers

Engineers & Planners
Traffic
Transportation
Parking

Linscott, Law & Greenspan, Engineers
600 S. Lake Avenue
Suite 500
Pasadena, CA 91106
626.796.2322 T
626.792.0941 F
www.llgengineers.com

Pasadena
Irvine
San Diego
Woodland Hills

Linscott, Law & Greenspan, Engineers (LLG) has prepared this trip generation analysis for the proposed Clarendon Street Apartments project located in the City of Los Angeles, California. This trip generation analysis has been prepared to determine if a formal traffic impact study would be required based on current City of Los Angeles Department of Transportation (LADOT) traffic study guidelines.

Briefly, it is concluded that the proposed project is forecast to generate a net decrease in vehicle trips when compared to the existing uses and is below the thresholds as outlined in the City's traffic study guidelines requiring the preparation of a formal traffic study. Thus, a formal traffic study should not be required by LADOT for the proposed project.

This memorandum provides a description of existing conditions, a summary of the proposed project; a summary of the project trip generation analysis; and a conclusion regarding the traffic impact study preparation criteria.

Existing Conditions

The project site is located at 22055-22121 Clarendon Street in the City of Los Angeles. The project site is located within the Ventura-Cahuenga Boulevard Corridor Specific Plan area. The existing site is presently occupied by a 29,638 square-foot United States Post Office (USPS) Retail Store and Distribution Center and a 10,929 square-foot office building. The project site location and general vicinity are illustrated in ***Figure 1***.

Vehicular access to the site is currently provided via six driveways: four driveways on Clarendon Street and two driveways on Glade Avenue. Two of the four driveways on Clarendon Street are inbound only driveways (i.e., left-turn and right-turn ingress movements only) and the remaining two driveways are outbound only driveways (i.e., left-turn and right-turn egress movements only). The existing driveways on Glade Avenue currently accommodate full access turning movements (i.e., left-turn and right-turn ingress and egress turning movements).

LINSCOTT LAW & GREENSPAN engineers

Project Description

The proposed project consists of the development of a new, 5-story, 335-unit apartment complex with a community room/gym, swimming pool, dog park and a walking trail. A total of 576 parking spaces and 336 bicycle spaces are planned to be provided on-site. Vehicular access to the project site will be provided via two new driveways on Clarendon Street. A third driveway is planned to be provided on the western end of the site for fire access only and will be gated with a knox box or removable bollards. The site plan for the proposed project is illustrated in ***Figure 2***.

Trip Generation Determination

Existing Trip Generation

In order to review the characteristics and level of overall existing site traffic generation, weekday manual peak hour turning movement traffic counts were conducted at the existing site. Specifically, manual driveway traffic counts were conducted at the six existing site driveways on an hourly basis (in 15-minute time increments) from 7:00 AM to 10:00 AM and from 3:00 PM to 6:00 PM for three consecutive weekdays in July 2014. Through conduct of these counts, the number of existing vehicle trips entering and exiting the site during the peak hours can be determined, and when compared to the existing square footages, site-specific trip generation rates can be derived for the site.

The traffic count data for the six site driveways was compiled, reviewed and analyzed to determine the highest one hour period of traffic volume at the site during both the weekday morning and afternoon periods. The peak hour traffic generation and derived trip generation rates associated with the existing uses are presented below:

- USPS Retail Store and Distribution Center
  - AM peak hour: 383 trips (12.92 trips per 1,000 square feet)
  - PM peak hour: 623 trips (21.02 trips per 1,000 square feet)
- Office Building
  - AM peak hour: 14 trips (1.28 trips per 1,000 square feet)
  - PM peak hour: 9 trips (0.82 trips per 1,000 square feet)

By combining the two land use components above, the site-specific surveys produced an AM peak hour site-wide trip generation of 397 AM peak hour vehicle trips and 632 PM peak hour vehicle trips.

LINSCOTT LAW & GREENSPAN engineers

For comparison and informational purposes, traffic volumes expected to be generated by the existing buildings to be removed from the project site were also estimated using rates published in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*[1]. The ITE trip generation rates are as follows and the trip generation forecast for the existing uses employing these rates are summarized below:

- ITE Land Use Code 732: United States Post Office
  - AM peak hour: 244 trips (8.23 trips per 1,000 square feet)
  - PM peak hour: 333 trips (11.22 trips per 1,000 square feet)
- ITE Land Use Code 710: General Office Building
  - AM peak hour: 17 trips (1.56 trips per 1,000 square feet)
  - PM peak hour: 16 trips (1.49 trips per 1,000 square feet)

By combining the two land use components above, application of the ITE trip generation rates to the existing land uses produced a site-wide trip generation of 261 AM peak hour vehicle trips and 349 PM peak hour vehicle trips.

As shown above, the actual vehicle trip generation associated with the existing uses is higher than those estimated through application of the ITE trip generation rates. Thus, the use of the lower ITE trip generation rates for traffic analysis purposes ensures that potential traffic impacts are not underestimated and can be considered conservative.

Project Trip Generation

Traffic volumes expected to be generated by the proposed project during the AM and PM peak hours, as well as on a daily basis, were estimated using rates published in the ITE *Trip Generation Manual*. Traffic volumes expected to be generated by the proposed project were based upon rates per number of residential units. ITE Land Use Code 220 (Apartment) trip generation average rates were used to forecast the traffic volumes expected to be generated by the proposed project.

The trip generation forecast associated with the proposed project is summarized in ***Table 1***. As shown in *Table 1*, the proposed project is forecast to generate 171 vehicle trips (34 inbound trips and 137 outbound trips) during the AM peak hour and 208 vehicle trips (135 inbound trips and 73 outbound trips) during the PM peak hour. Over a 24-hour period, the proposed project is forecast to generate 2,228 daily trip ends during a typical weekday. It should be noted that this can also be considered conservative in that no trip reductions have been applied to the forecast to account for

[1] *Trip Generation Manual*, Institute of Transportation Engineers, 9th Edition, 2012.

future residents that may take transit, carpool with other residents, use their bicycle and/or walk to their destinations.

When compared to the existing site uses (utilizing the lower ITE trip generation rates), the proposed project is forecast to result in a net decrease of 90 vehicle trips during the AM peak hour, and a net decrease of 141 vehicle trips during the PM peak hour. Over a 24-hour period, the proposed project is forecast to result in a net decrease of 1,100 daily trip ends during a typical weekday as compared to the existing uses.

Trip Generation Assessment

LADOT's traffic study guidelines[2] require that a formal traffic study or technical memorandum be prepared based on the following:

1. A Technical Memorandum is required when the project is likely to add 25 to 42 AM or PM peak hour trips, and the adjacent intersection(s) are presently estimated to be operating at LOS E or F.

2. A Traffic Study is required when the project is likely to add 500 or more daily trips, or likely to add 43 or more AM or PM peak hour trips.

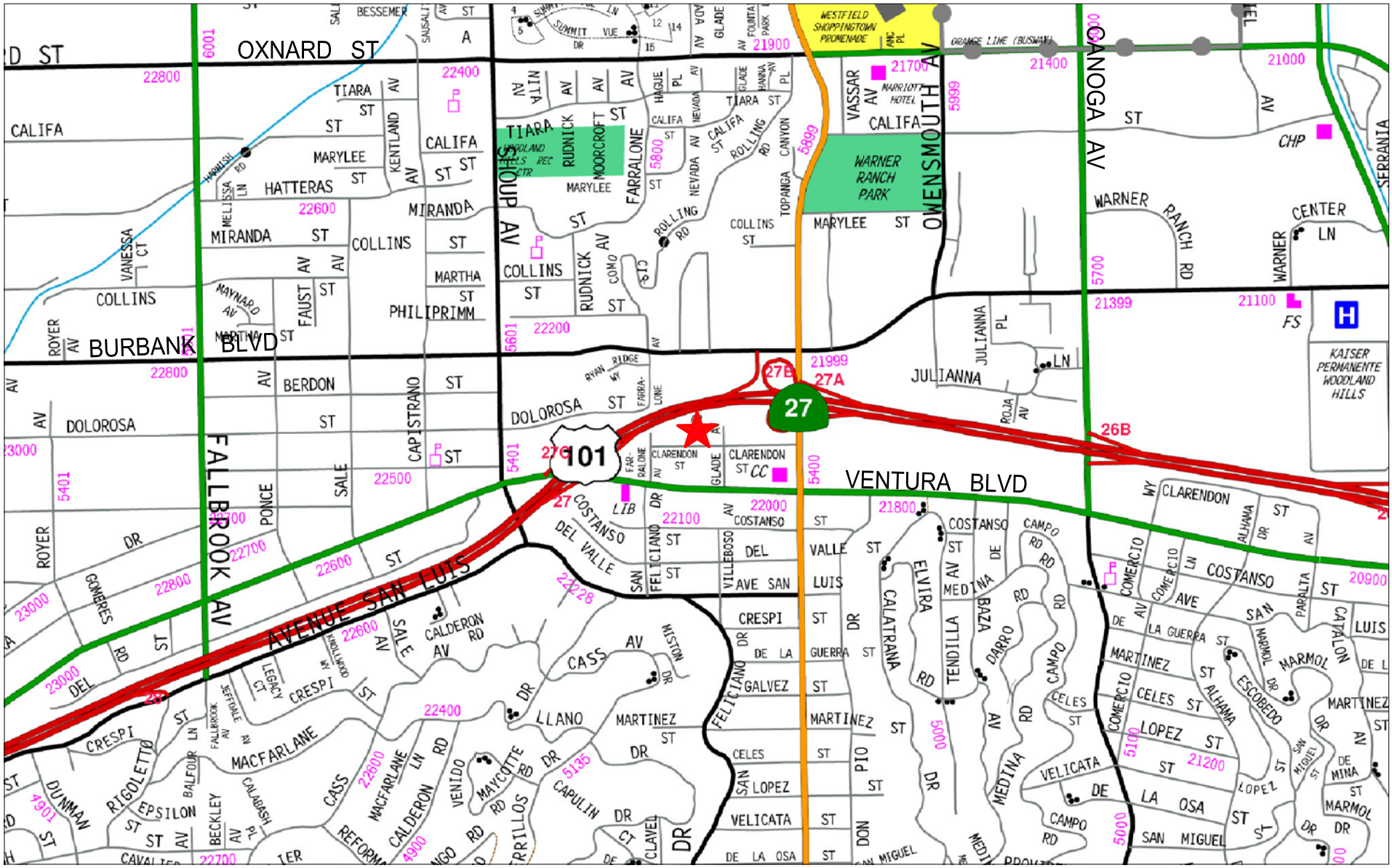
As shown in *Table 1*, the proposed project is forecast to result in a net decrease of 90 vehicle trips during the AM peak hour and a net decrease of 141 vehicle trips during the PM peak hour. Based on a review of the trip generation forecast, the proposed project is forecast to result in a decrease in vehicle trips and is below the thresholds as outlined in the City's traffic study guidelines requiring the preparation of a formal traffic study. Thus, a formal traffic study should not be required by LADOT for the proposed project.

Summary

Based on a review of the project trip generation forecast, the trip generation potential associated with the proposed Clarendon Street Apartments project is forecast to be below the thresholds as outlined in the City's traffic study guidelines requiring preparation of a traffic impact study. Thus, a formal traffic impact study should not be required by LADOT for the proposed project.

Please feel free to call us with any questions or comments at 626.796.2322.

[2] *Traffic Study Policies and Procedures*, City of Los Angeles Department of Transportation, August 2014.



N

NOT TO SCALE

MAP SOURCE: RAND MCNALLY & COMPANY

PROJECT SITE

FIGURE 1
SITE VICINITY

LINSCOTT, LAW & GREENSPAN, engineers

CLARENDON STREET APARTMENTS PROJECT

o:\job_file\4084\dwg\f-1.dwg LDP 16:08:07 07/24/2014 turney

N

NOT TO SCALE

MAP SOURCE: AMCAL

FIGURE 2
SITE PLAN

LINSCOTT, LAW & GREENSPAN, engineers

CLARENDON STREET APARTMENTS PROJECT

o:\job_file\4084\dwg\f-2.dwg LDP 08:50:36 05/04/2015 rodriquez

Table 1
PROJECT TRIP GENERATION [1]

LAND USE	SIZE	DAILY TRIP ENDS [2] VOLUMES	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
			IN	OUT	TOTAL	IN	OUT	TOTAL
Proposed Project								
Apartment [3]	335 DU	2,228	34	137	171	135	73	208
Subtotal Proposed Project		**2,228**	**34**	**137**	**171**	**135**	**73**	**208**
Less Existing Uses								
United States Post Office [4]	(29,638) GSF	(3,207)	(127)	(117)	(244)	(170)	(163)	(333)
Office [5]	(10,929) GSF	(121)	(15)	(2)	(17)	(3)	(13)	(16)
Subtotal Existing Uses		**(3,328)**	**(142)**	**(119)**	**(261)**	**(173)**	**(176)**	**(349)**
NET INCREASE		**(1,100)**	**(108)**	**18**	**(90)**	**(38)**	**(103)**	**(141)**

[1] Source: ITE "Trip Generation Manual", 9th Edition, 2012.
[2] Trips are one-way traffic movements, entering or leaving.
[3] ITE Land Use Code 220 (Apartment) trip generation average rates.
- Daily Trip Rate: 6.65 trips/dwelling unit; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.51 trips/dwelling units; 20% inbound/80% outbound
- PM Peak Hour Trip Rate: 0.62 trips/dwelling units; 65% inbound/35% outbound

[4] ITE Land Use Code 732 (United States Post Office) trip generation average rates.
- Daily Trip Rate: 108.19 trips/1,000 SF of floor area; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 8.23 trips/1,000 SF of floor area; 52% inbound/48% outbound
- PM Peak Hour Trip Rate: 11.22 trips/1,000 SF of floor area; 51% inbound/49% outbound

[5] ITE Land Use Code 710 (General Office Building) trip generation average rates.
- Daily Trip Rate: 11.03 trips/1,000 SF of floor area; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 1.56 trips/1,000 SF of floor area; 88% inbound/12% outbound
- PM Peak Hour Trip Rate: 1.49 trips/1,000 SF of floor area; 17% inbound/83% outbound

APPENDIX

COUNT DATA

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: TUESDAY, JULY 08, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 1 - CLARENDON STREET MAIL DROP-OFF (ENTER)
DRIVEWAY 2 - CLARENDON STREET MAIL DROP OFF (EXIT)

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0700-0715	3	2	2	3
0715-0730	2	8	2	8
0730-0745	5	6	4	7
0745-0800	4	8	5	7
0800-0815	6	5	3	8
0815-0830	7	11	5	13
0830-0845	2	9	3	8
0845-0900	9	8	2	15
0900-0915	5	18	6	17
0915-0930	10	13	4	19
0930-0945	5	10	5	10
0945-1000	5	7	7	5

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0700-0800	14	24	13	25
0715-0815	17	27	14	30
0730-0830	22	30	17	35
0745-0845	19	33	16	36
0800-0900	24	33	13	44
0815-0915	23	46	16	53
0830-0930	26	48	15	59
0845-0945	29	49	17	61
0900-1000	25	48	22	51

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 1,2 MAIL DROP

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: TUESDAY, JULY 08, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 2 - CLARENDON STREET - EMPLOYEE ENTRANCE / EXIT

15-MIN	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0700-0715	2	0	0	3	0	0	0	0
0715-0730	0	3	1	1	0	0	0	0
0730-0745	1	0	1	2	0	0	0	0
0745-0800	1	0	0	1	0	0	0	0
0800-0815	0	0	0	0	0	0	0	0
0815-0830	1	0	0	0	1	0	3	0
0830-0845	1	0	0	0	0	0	0	2
0845-0900	0	1	2	1	2	0	2	1
0900-0915	1	2	0	4	1	0	0	2
0915-0930	0	4	1	4	0	0	4	2
0930-0945	1	2	0	2	0	0	10	2
0945-1000	0	1	0	1	0	1	9	3

1-HOUR	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0700-0800	4	3	2	7	0	0	0	0
0715-0815	2	3	2	4	0	0	0	0
0730-0830	3	0	1	3	1	0	3	0
0745-0845	3	0	0	1	1	0	3	2
0800-0900	2	1	2	1	3	0	5	3
0815-0915	3	3	2	5	4	0	5	5
0830-0930	2	7	3	9	3	0	6	7
0845-0945	2	9	3	11	3	0	16	7
0900-1000	2	9	1	11	1	1	23	9

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: TUESDAY, JULY 08, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 3 - CLARENDON STREET - STORE EXIT
DRIVEWAY 4 - CLARENDON STREET - STORE ENTRANCE

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0700-0715	1	0	3	1
0715-0730	3	4	4	3
0730-0745	2	3	6	0
0745-0800	4	4	7	1
0800-0815	2	4	4	1
0815-0830	3	3	8	5
0830-0845	7	10	10	7
0845-0900	4	8	5	4
0900-0915	2	13	15	9
0915-0930	7	17	15	8
0930-0945	8	12	9	5
0945-1000	5	10	15	7

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0700-0800	10	11	20	5
0715-0815	11	15	21	5
0730-0830	11	14	25	7
0745-0845	16	21	29	14
0800-0900	16	25	27	17
0815-0915	16	34	38	25
0830-0930	20	48	45	28
0845-0945	21	50	44	26
0900-1000	22	52	54	29

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 3,4

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: TUESDAY, JULY 08, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 5 - GLADE AVENUE / USPS DRIVEWAY

DRIVEWAY 6 - GLADE AVENUE / OFFICE DRIVEWAY

15-MIN	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0700-0715	13	1	0	0	0	0
0715-0730	28	0	0	0	1	0
0730-0745	10	0	0	0	0	0
0745-0800	0	0	0	0	1	0
0800-0815	3	1	0	0	0	0
0815-0830	2	0	0	0	1	0
0830-0845	1	0	0	0	0	0
0845-0900	2	0	0	3	0	0
0900-0915	5	0	2	2	4	0
0915-0930	4	1	0	6	4	0
0930-0945	2	2	0	8	1	0
0945-1000	3	0	0	5	5	0

1-HOUR	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0700-0800	51	1	0	0	2	0
0715-0815	41	1	0	0	2	0
0730-0830	15	1	0	0	2	0
0745-0845	6	1	0	0	2	0
0800-0900	8	1	0	3	1	0
0815-0915	10	0	2	5	5	0
0830-0930	12	1	2	11	8	0
0845-0945	13	3	2	19	9	0
0900-1000	14	3	2	21	14	0

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAY 6

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: TUESDAY, JULY 08, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 1 - CLARENDON STREET MAIL DROP-OFF (ENTER)
DRIVEWAY 2 - CLARENDON STREET MAIL DROP OFF (EXIT)

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0300-0315	11	12	11	12
0315-0330	12	9	5	16
0330-0345	11	16	15	12
0345-0400	13	12	10	15
0400-0415	18	8	13	13
0415-0430	15	12	8	19
0430-0445	18	10	12	16
0445-0500	15	8	11	12
0500-0515	18	16	15	19
0515-0530	20	19	20	19
0530-0545	19	17	18	18
0545-0600	16	20	22	14

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0300-0400	47	49	41	55
0315-0415	54	45	43	56
0330-0430	57	48	46	59
0345-0445	64	42	43	63
0400-0500	66	38	44	60
0415-0515	66	46	46	66
0430-0530	71	53	58	66
0445-0545	72	60	64	68
0500-0600	73	72	75	70

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 1,2 MAIL DROP

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: TUESDAY, JULY 08, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 2 - CLARENDON STREET - EMPLOYEE ENTRANCE / EXIT

15-MIN	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0300-0315	2	0	0	2	2	0	0	1
0315-0330	1	0	0	1	1	1	0	2
0330-0345	1	3	1	0	1	5	0	0
0345-0400	0	1	0	0	0	2	0	0
0400-0415	2	0	0	0	1	3	0	0
0415-0430	3	1	2	1	1	4	0	0
0430-0445	4	1	2	5	3	2	1	0
0445-0500	7	2	1	2	10	11	0	0
0500-0515	1	1	2	0	9	8	3	0
0515-0530	2	3	3	4	2	2	0	0
0530-0545	3	2	2	4	4	3	0	1
0545-0600	4	2	5	6	3	4	0	0

1-HOUR	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0300-0400	4	4	1	3	4	8	0	3
0315-0415	4	4	1	1	3	11	0	2
0330-0430	6	5	3	1	3	14	0	0
0345-0445	9	3	4	6	5	11	1	0
0400-0500	16	4	5	8	15	20	1	0
0415-0515	15	5	7	8	23	25	4	0
0430-0530	14	7	8	11	24	23	4	0
0445-0545	13	8	8	10	25	24	3	1
0500-0600	10	8	12	14	18	17	3	1

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: TUESDAY, JULY 08, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 3 - CLARENDON STREET - STORE EXIT
DRIVEWAY 4 - CLARENDON STREET - STORE ENTRANCE

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0300-0315	10	15	25	5
0315-0330	10	13	16	12
0330-0345	13	15	20	5
0345-0400	12	18	27	8
0400-0415	17	20	24	10
0415-0430	15	20	27	7
0430-0445	12	22	30	10
0445-0500	15	25	25	10
0500-0515	20	20	30	16
0515-0530	17	18	28	9
0530-0545	15	17	22	10
0545-0600	12	16	19	8

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0300-0400	45	61	88	30
0315-0415	52	66	87	35
0330-0430	57	73	98	30
0345-0445	56	80	108	35
0400-0500	59	87	106	37
0415-0515	62	87	112	43
0430-0530	64	85	113	45
0445-0545	67	80	105	45
0500-0600	64	71	99	43

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 3,4

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: TUESDAY, JULY 08, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 5 - GLADE AVENUE / USPS DRIVEWAY

DRIVEWAY 6 - GLADE AVENUE / OFFICE DRIVEWAY

15-MIN	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0300-0315	0	0	0	0	0	1
0315-0330	1	1	0	0	1	1
0330-0345	0	2	0	0	0	1
0345-0400	0	1	0	2	1	0
0400-0415	0	4	1	0	0	1
0415-0430	1	2	0	1	0	3
0430-0445	0	6	2	0	1	1
0445-0500	0	6	0	0	0	0
0500-0515	0	16	0	0	1	0
0515-0530	0	8	2	0	0	4
0530-0545	1	4	0	0	0	2
0545-0600	0	0	0	0	0	1

1-HOUR	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0300-0400	1	4	0	2	2	3
0315-0415	1	8	1	2	2	3
0330-0430	1	9	1	3	1	5
0345-0445	1	13	3	3	2	5
0400-0500	1	18	3	1	1	5
0415-0515	1	30	2	1	2	4
0430-0530	0	36	4	0	2	5
0445-0545	1	34	2	0	1	6
0500-0600	1	28	2	0	1	7

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAY 6

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: WEDNESDAY, JULY 09, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 1 - CLARENDON STREET MAIL DROP-OFF (ENTER)
DRIVEWAY 2 - CLARENDON STREET MAIL DROP OFF (EXIT)

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0700-0715	3	4	4	3
0715-0730	4	7	2	9
0730-0745	3	5	0	8
0745-0800	3	5	3	5
0800-0815	6	6	4	8
0815-0830	6	8	5	9
0830-0845	10	8	8	10
0845-0900	6	9	4	11
0900-0915	5	11	5	11
0915-0930	8	9	4	14
0930-0945	9	9	6	11
0945-1000	6	9	6	9

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0700-0800	13	21	9	25
0715-0815	16	23	9	30
0730-0830	18	24	12	30
0745-0845	25	27	20	32
0800-0900	28	31	21	38
0815-0915	27	36	22	41
0830-0930	29	37	21	46
0845-0945	28	38	19	47
0900-1000	28	38	21	45

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 1,2 MAIL DROP

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: WEDNESDAY, JULY 09, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 2 - CLARENDON STREET - EMPLOYEE ENTRANCE / EXIT

15-MIN	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0700-0715	2	0	0	2	0	0	0	0
0715-0730	2	1	0	2	0	0	0	0
0730-0745	0	1	0	2	0	0	0	0
0745-0800	1	2	0	1	0	0	0	0
0800-0815	2	2	1	4	0	0	0	0
0815-0830	1	0	0	0	0	0	0	2
0830-0845	1	2	0	1	1	0	0	1
0845-0900	2	0	0	0	0	0	2	4
0900-0915	0	2	2	3	0	0	5	0
0915-0930	0	3	1	3	1	0	7	2
0930-0945	1	2	1	1	0	1	6	5
0945-1000	0	2	0	2	0	0	7	3

1-HOUR	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0700-0800	5	4	0	7	0	0	0	0
0715-0815	5	6	1	9	0	0	0	0
0730-0830	4	5	1	7	0	0	0	2
0745-0845	5	6	1	6	1	0	0	3
0800-0900	6	4	1	5	1	0	2	7
0815-0915	4	4	2	4	1	0	7	7
0830-0930	3	7	3	7	2	0	14	7
0845-0945	3	7	4	7	1	1	20	11
0900-1000	1	9	4	9	1	1	25	10

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: WEDNESDAY, JULY 09, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 3 - CLARENDON STREET - STORE EXIT
DRIVEWAY 4 - CLARENDON STREET - STORE ENTRANCE

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0700-0715	2	6	7	1
0715-0730	1	3	3	2
0730-0745	5	4	7	1
0745-0800	5	2	8	3
0800-0815	3	7	9	2
0815-0830	3	7	16	1
0830-0845	5	15	8	7
0845-0900	2	14	13	2
0900-0915	4	3	7	3
0915-0930	7	19	22	5
0930-0945	4	16	14	6
0945-1000	6	15	16	7

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0700-0800	13	15	25	7
0715-0815	14	16	27	8
0730-0830	16	20	40	7
0745-0845	16	31	41	13
0800-0900	13	43	46	12
0815-0915	14	39	44	13
0830-0930	18	51	50	17
0845-0945	17	52	56	16
0900-1000	21	53	59	21

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 3,4

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: WEDNESDAY, JULY 09, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 5 - GLADE AVENUE / USPS DRIVEWAY

DRIVEWAY 6 - GLADE AVENUE / OFFICE DRIVEWAY

15-MIN	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0700-0715	15	1	0	0	0	0
0715-0730	28	0	0	0	0	0
0730-0745	7	1	0	0	1	0
0745-0800	2	0	0	0	1	0
0800-0815	1	1	0	2	1	0
0815-0830	5	1	0	0	3	0
0830-0845	4	0	1	0	3	0
0845-0900	5	0	0	2	7	0
0900-0915	1	3	0	3	1	0
0915-0930	1	0	0	9	1	0
0930-0945	4	1	1	7	1	0
0945-1000	4	1	0	4	1	0

1-HOUR	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0700-0800	52	2	0	0	2	0
0715-0815	38	2	0	2	3	0
0730-0830	15	3	0	2	6	0
0745-0845	12	2	1	2	8	0
0800-0900	15	2	1	4	14	0
0815-0915	15	4	1	5	14	0
0830-0930	11	3	1	14	12	0
0845-0945	11	4	1	21	10	0
0900-1000	10	5	1	23	4	0

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAY 6

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: WEDNESDAY, JULY 09, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 1 - CLARENDON STREET MAIL DROP-OFF (ENTER)
DRIVEWAY 2 - CLARENDON STREET MAIL DROP OFF (EXIT)

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0300-0315	15	10	12	13
0315-0330	9	7	5	11
0330-0345	15	9	11	13
0345-0400	11	7	8	10
0400-0415	17	16	16	17
0415-0430	12	11	9	14
0430-0445	13	7	9	11
0445-0500	17	11	12	16
0500-0515	15	9	11	13
0515-0530	21	16	16	21
0530-0545	15	12	10	17
0545-0600	17	15	16	16

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0300-0400	50	33	36	47
0315-0415	52	39	40	51
0330-0430	55	43	44	54
0345-0445	53	41	42	52
0400-0500	59	45	46	58
0415-0515	57	38	41	54
0430-0530	66	43	48	61
0445-0545	68	48	49	67
0500-0600	68	52	53	67

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 1,2 MAIL DROP

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: WEDNESDAY, JULY 09, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 2 - CLARENDON STREET - EMPLOYEE ENTRANCE / EXIT

15-MIN	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0300-0315	2	1	1	0	3	1	0	0
0315-0330	1	0	0	2	0	4	0	0
0330-0345	2	2	2	1	4	7	0	0
0345-0400	1	1	2	2	2	3	0	0
0400-0415	4	3	0	3	4	6	0	1
0415-0430	1	0	1	0	2	2	0	0
0430-0445	1	1	2	2	6	9	1	0
0445-0500	3	1	1	2	5	8	0	1
0500-0515	5	2	1	2	3	4	1	0
0515-0530	2	3	4	5	2	2	0	1
0530-0545	2	1	3	4	2	3	0	1
0545-0600	3	2	4	5	2	2	0	0

1-HOUR	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0300-0400	6	4	5	5	9	15	0	0
0315-0415	8	6	4	8	10	20	0	1
0330-0430	8	6	5	6	12	18	0	1
0345-0445	7	5	5	7	14	20	1	1
0400-0500	9	5	4	7	17	25	1	2
0415-0515	10	4	5	6	16	23	2	1
0430-0530	11	7	8	11	16	23	2	2
0445-0545	12	7	9	13	12	17	1	3
0500-0600	12	8	12	16	9	11	1	2

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: WEDNESDAY, JULY 09, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 3 - CLARENDON STREET - STORE EXIT
DRIVEWAY 4 - CLARENDON STREET - STORE ENTRANCE

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0300-0315	5	14	15	7
0315-0330	7	18	16	10
0330-0345	5	10	11	5
0345-0400	5	13	12	6
0400-0415	6	15	17	6
0415-0430	10	22	26	5
0430-0445	6	25	22	10
0445-0500	7	25	25	8
0500-0515	14	23	27	9
0515-0530	9	19	26	5
0530-0545	10	19	22	6
0545-0600	9	14	20	5

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0300-0400	22	55	54	28
0315-0415	23	56	56	27
0330-0430	26	60	66	22
0345-0445	27	75	77	27
0400-0500	29	87	90	29
0415-0515	37	95	100	32
0430-0530	36	92	100	32
0445-0545	40	86	100	28
0500-0600	42	75	95	25

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 3,4

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: WEDNESDAY, JULY 09, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 5 - GLADE AVENUE / USPS DRIVEWAY

DRIVEWAY 6 - GLADE AVENUE / OFFICE DRIVEWAY

15-MIN	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0300-0315	0	1	0	0	2	4
0315-0330	0	0	0	1	0	1
0330-0345	1	1	1	0	1	1
0345-0400	0	2	0	1	1	1
0400-0415	0	13	0	0	1	2
0415-0430	0	10	0	0	0	0
0430-0445	3	3	0	0	1	5
0445-0500	0	4	0	0	0	0
0500-0515	0	13	1	0	0	1
0515-0530	3	8	1	0	0	0
0530-0545	0	2	1	0	0	3
0545-0600	0	0	0	0	0	0

1-HOUR	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0300-0400	1	4	1	2	4	7
0315-0415	1	16	1	2	3	5
0330-0430	1	26	1	1	3	4
0345-0445	3	28	0	1	3	8
0400-0500	3	30	0	0	2	7
0415-0515	3	30	1	0	1	6
0430-0530	6	28	2	0	1	6
0445-0545	3	27	3	0	0	4
0500-0600	3	23	3	0	0	4

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAY 6

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: THURSDAY, JULY 10, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 1 - CLARENDON STREET MAIL DROP-OFF (ENTER)
DRIVEWAY 2 - CLARENDON STREET MAIL DROP OFF (EXIT)

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0700-0715	0	3	0	3
0715-0730	2	4	1	5
0730-0745	4	7	2	9
0745-0800	6	11	3	14
0800-0815	8	6	5	9
0815-0830	7	7	6	8
0830-0845	4	7	1	10
0845-0900	5	5	5	5
0900-0915	9	7	7	9
0915-0930	8	10	5	13
0930-0945	3	7	2	7
0945-1000	9	11	9	12

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0700-0800	12	25	6	31
0715-0815	20	28	11	37
0730-0830	25	31	16	40
0745-0845	25	31	15	41
0800-0900	24	25	17	32
0815-0915	25	26	19	32
0830-0930	26	29	18	37
0845-0945	25	29	19	34
0900-1000	29	35	23	41

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 1,2 MAIL DROP

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: THURSDAY, JULY 10, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 2 - CLARENDON STREET - EMPLOYEE ENTRANCE / EXIT

15-MIN	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0700-0715	0	0	0	0	0	0	0	0
0715-0730	1	3	0	4	0	0	0	0
0730-0745	0	2	0	2	0	0	0	0
0745-0800	0	1	0	0	0	0	0	0
0800-0815	0	1	1	0	0	0	0	0
0815-0830	1	1	0	0	0	0	0	0
0830-0845	1	0	1	2	0	0	1	0
0845-0900	2	4	0	3	0	0	0	2
0900-0915	1	2	1	0	0	0	5	5
0915-0930	1	1	0	1	1	0	10	2
0930-0945	1	2	1	0	0	0	4	2
0945-1000	0	1	1	3	1	0	2	5

1-HOUR	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0700-0800	1	6	0	6	0	0	0	0
0715-0815	1	7	1	6	0	0	0	0
0730-0830	1	5	1	2	0	0	0	0
0745-0845	2	3	2	2	0	0	1	0
0800-0900	4	6	2	5	0	0	1	2
0815-0915	5	7	2	5	0	0	6	7
0830-0930	5	7	2	6	1	0	16	9
0845-0945	5	9	2	4	1	0	19	11
0900-1000	3	6	3	4	2	0	21	14

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: THURSDAY, JULY 10, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 3 - CLARENDON STREET - STORE EXIT

DRIVEWAY 4 - CLARENDON STREET - STORE ENTRANCE

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0700-0715	0	3	3	0
0715-0730	1	1	1	2
0730-0745	2	4	5	0
0745-0800	4	6	9	4
0800-0815	2	4	3	2
0815-0830	3	5	7	5
0830-0845	3	15	14	4
0845-0900	3	9	10	6
0900-0915	7	16	13	7
0915-0930	7	7	11	4
0930-0945	5	13	14	8
0945-1000	6	16	15	9

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0700-0800	7	14	18	6
0715-0815	9	15	18	8
0730-0830	11	19	24	11
0745-0845	12	30	33	15
0800-0900	11	33	34	17
0815-0915	16	45	44	22
0830-0930	20	47	48	21
0845-0945	22	45	48	25
0900-1000	25	52	53	28

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 3,4

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: THURSDAY, JULY 10, 2014

PERIOD: 07:00 AM TO 10:00 AM

SITE: DRIVEWAY 5 - GLADE AVENUE / USPS DRIVEWAY

DRIVEWAY 6 - GLADE AVENUE / OFFICE DRIVEWAY

15-MIN	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0700-0715	14	0	0	0	0	0
0715-0730	31	0	0	0	0	0
0730-0745	4	1	0	0	0	0
0745-0800	2	0	0	1	2	0
0800-0815	4	2	0	1	0	0
0815-0830	4	3	0	1	0	0
0830-0845	3	2	0	1	1	0
0845-0900	3	0	1	6	1	1
0900-0915	4	0	0	12	5	0
0915-0930	4	0	0	2	2	0
0930-0945	1	0	0	1	3	0
0945-1000	1	0	0	0	3	0

1-HOUR	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0700-0800	51	1	0	1	2	0
0715-0815	41	3	0	2	2	0
0730-0830	14	6	0	3	2	0
0745-0845	13	7	0	4	3	0
0800-0900	14	7	1	9	2	1
0815-0915	14	5	1	20	7	1
0830-0930	14	2	1	21	9	1
0845-0945	12	0	1	21	11	1
0900-1000	10	0	0	15	13	0

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAY 6

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: THURSDAY, JULY 10, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 1 - CLARENDON STREET MAIL DROP-OFF (ENTER)
DRIVEWAY 2 - CLARENDON STREET MAIL DROP OFF (EXIT)

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0300-0315	9	7	6	10
0315-0330	10	8	6	12
0330-0345	10	6	7	9
0345-0400	15	10	10	15
0400-0415	17	11	10	18
0415-0430	11	7	6	12
0430-0445	17	13	14	16
0445-0500	18	13	15	16
0500-0515	12	12	12	12
0515-0530	21	13	15	19
0530-0545	11	8	7	12
0545-0600	20	12	19	13

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT IN (1)	LEFT IN (1)	RIGHT OUT (2)	LEFT OUT (2)
0300-0400	44	31	29	46
0315-0415	52	35	33	54
0330-0430	53	34	33	54
0345-0445	60	41	40	61
0400-0500	63	44	45	62
0415-0515	58	45	47	56
0430-0530	68	51	56	63
0445-0545	62	46	49	59
0500-0600	64	45	53	56

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 1,2 MAIL DROP

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: THURSDAY, JULY 10, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 2 - CLARENDON STREET - EMPLOYEE ENTRANCE / EXIT

15-MIN	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0300-0315	1	0	0	0	2	3	1	0
0315-0330	0	1	1	1	3	5	0	0
0330-0345	1	0	1	1	1	2	1	1
0345-0400	2	1	2	4	2	3	0	1
0400-0415	3	1	1	3	3	4	0	0
0415-0430	0	1	0	1	3	2	0	0
0430-0445	2	1	1	0	4	5	0	1
0445-0500	1	1	1	1	5	7	0	0
0500-0515	2	1	1	2	6	7	0	0
0515-0530	4	2	3	4	2	4	0	1
0530-0545	5	2	3	6	1	2	0	0
0545-0600	3	2	2	2	1	1	1	1

1-HOUR	PRIVATE VEHICLES				USPS VEHICLES			
PERIOD:	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)	RIGHT IN (2)	LEFT IN (2)	RIGHT OUT (2)	LEFT OUT (2)
0300-0400	4	2	4	6	8	13	2	2
0315-0415	6	3	5	9	9	14	1	2
0330-0430	6	3	4	9	9	11	1	2
0345-0445	7	4	4	8	12	14	0	2
0400-0500	6	4	3	5	15	18	0	1
0415-0515	5	4	3	4	18	21	0	1
0430-0530	9	5	6	7	17	23	0	2
0445-0545	12	6	8	13	14	20	0	1
0500-0600	14	7	9	14	10	14	1	2

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: THURSDAY, JULY 10, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 3 - CLARENDON STREET - STORE EXIT
DRIVEWAY 4 - CLARENDON STREET - STORE ENTRANCE

15-MIN	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0300-0315	10	17	18	11
0315-0330	15	18	22	12
0330-0345	8	19	22	7
0345-0400	9	14	18	5
0400-0415	4	19	15	7
0415-0430	11	15	22	9
0430-0445	13	15	17	7
0445-0500	7	20	20	6
0500-0515	6	20	23	7
0515-0530	7	23	27	8
0530-0545	8	22	21	7
0545-0600	7	16	19	4

1-HOUR	PRIVATE VEHICLES			
PERIOD:	RIGHT OUT (3)	LEFT OUT (3)	RIGHT IN (4)	LEFT IN (4)
0300-0400	42	68	80	35
0315-0415	36	70	77	31
0330-0430	32	67	77	28
0345-0445	37	63	72	28
0400-0500	35	69	74	29
0415-0515	37	70	82	29
0430-0530	33	78	87	28
0445-0545	28	85	91	28
0500-0600	28	81	90	26

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAYS 3,4

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978

DRIVEWAY COUNT SUMMARY

CLIENT: LLG-PASADENA

PROJECT: CLARENDON STREET PROJECT - WOODLAND HILLS

DATE: THURSDAY, JULY 10, 2014

PERIOD: 03:00 PM TO 06:00 PM

SITE: DRIVEWAY 5 - GLADE AVENUE / USPS DRIVEWAY

DRIVEWAY 6 - GLADE AVENUE / OFFICE DRIVEWAY

15-MIN	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0300-0315	2	0	1	0	1	4
0315-0330	0	2	2	1	0	3
0330-0345	1	5	0	1	1	0
0345-0400	0	3	0	0	0	0
0400-0415	0	2	1	1	0	0
0415-0430	1	6	0	0	0	1
0430-0445	0	4	2	0	0	0
0445-0500	1	5	1	0	0	0
0500-0515	0	18	0	0	0	2
0515-0530	0	10	0	0	0	4
0530-0545	0	2	0	0	0	1
0545-0600	0	0	0	0	0	0

1-HOUR	PRIVATE VEHICLES		USPS VEHICLES		PRIVATE VEHICLES	
PERIOD:	ENTER (5)	EXIT (5)	ENTER (5)	EXIT (5)	ENTER (6)	EXIT (6)
0300-0400	3	10	3	2	2	7
0315-0415	1	12	3	3	1	3
0330-0430	2	16	1	2	1	1
0345-0445	1	15	3	1	0	1
0400-0500	2	17	4	1	0	1
0415-0515	2	33	3	0	0	3
0430-0530	1	37	3	0	0	6
0445-0545	1	35	1	0	0	7
0500-0600	0	30	0	0	0	7

NOTE: NO USPS VEHICLES OBSERVED DRIVEWAY 6

THE TRAFFIC SOLUTION
329 DIAMOND STREET
ARCADIA, CALIFORNIA 91006
626.446.7978