

**FINAL MASTER
ENVIRONMENTAL IMPACT REPORT**

**CORBIN AND NORDHOFF
ENV 2002-1230-EIR
SCH # 2002051125**

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I. INTRODUCTION

As defined by Section 15121 of the California Environmental Quality Act (CEQA), an Environmental Impact Report (EIR) is an informational document which will inform public agency decisionmakers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The City of Los Angeles Department of City Planning (LADCP) has been designated as the Lead Agency for the proposed Project under CEQA. Due to the nature of the proposed Project, it was determined by the Lead Agency that a Master Environmental Impact Report (MEIR) would be the most appropriate environmental document.

The Draft MEIR was prepared for the proposed Project at the property located at 19601 Nordhoff Street, Los Angeles, California. The property is located within the Chatsworth - Porter Ranch Community Plan Area. The proposed Project at the Project Site includes a General Plan Amendment from Light Industrial to Community Commercial and Zone Change from [T][Q]M1-1, MR2-1 and P-1 to C2-1 over 35.5 acres of land. The proposed Project at the Project Site also includes the previously approved Homeplace Retirement Community consisting of 389 senior housing units and 35 assisted living units.¹ The Project Site is currently under the control of the applicant and the current tenant plans to vacate the Site upon termination of the lease in 2005 or possibly sooner. While a specific development scenario has not been determined for the Project Site, for planning and analysis purposes, four potential worst-case development scenarios have been identified as follows:²

Scenario 1: Retail

340,000 square feet Retail
389 Senior Housing units
35 Assisted Living units

Scenario 3: Retail/Residential

250,000 square feet Retail
300 Condominium units
389 Senior Housing units
35 Assisted Living units

Scenario 2: Office

930,000 square feet Office
389 Senior Housing units
35 Assisted Living units

Scenario 4: Office/Residential

690,000 square feet Office
300 Condominium units
389 Senior Housing units
35 Assisted Living units

¹The Homeplace Retirement Community included 389 senior housing units and 35 assisted living units at the time the EIR was prepared. However, the revised application for the Homeplace facility included 390 senior housing units and 35 assisted living units, within 505,000 square feet.

²Development scenarios for the project site were determined based on the assumption that surface parking would be provided for retail services and structured parking would be provided for commercial services. Additionally, it was assumed that any retail development on site would not exceed three stories. Based on these assumptions, the amount of parking that could fit on the project site was determined. The corresponding square footage of floor area for retail and office use was calculated. Potential development scenarios that include residential units were also determined. These square footage calculations were then extrapolated to the Add Area properties (total acreage) to determine the allowable floor area for retail, office, and residential land uses.

The City of Los Angeles Department of City Planning staff identified fifteen properties located to the north of Prairie Street, comprising approximately fifteen acres, for a potential additional area (Add Area) to coincide with the General Plan Amendment and Zone Change at the Project Site. As a result, potential environmental impacts resulting from the development scenarios analyzed for this Add Area were identified. The Add Area properties are not currently under the applicant's control and each property has a separate owner. Application and initiation of the Zone Change and General Plan Amendment can either be completed by the LADCP or the Add Area property owners. While a specific development scenario has not been determined for the Add Area, for planning and analysis purposes, the following potential development scenarios have been determined and were analyzed throughout the document:

Scenario 1: Retail

200,000 square feet Retail

Scenario 2: Office

586,000 square feet Office

Scenario 3: Retail/Residential

150,000 square feet Retail

100 Condominium units

Scenario 4: Office/Residential

435,000 square feet Office

100 Condominium units

An Environmental Assessment Form (EAF) was submitted by the project applicant on March 11, 2002. A preliminary scope of significant impacts for the Draft MEIR was determined by the LADCP, Environmental Review Section (ERS). Due to the size of the Project, it was determined that an EIR would be required and an Initial Study was not prepared. The LADCP ERS circulated a Notice of Preparation (NOP) from May 23 to June 24, 2002 and held a Public Scoping Meeting on June 4, 2002 at California State University–Northridge to elicit comments regarding the proposed scope of the EIR. A final scope for the Draft MEIR includes the following areas of potential impact:

- Aesthetics
- Geology and soils
- Land use and planning
- Recreation
- Air quality
- Hazardous materials
- Noise
- Transportation
- Biological resources
- Hydrology
- Population/housing
- Utilities

The following environmental impact areas were determined to be less than significant and were therefore not analyzed in the Draft MEIR: agricultural resources, cultural resources, and mineral resources. This determination, made by the LADCP, was based on the lack of identification of a substantial concentration of these resources in the General Plan Framework EIR, the developed nature of the Project Site and Add Area, and the considerable length of time that the Project Site and Add Area have been developed.

The four development scenarios proposed for the Project Site were analyzed for potential environmental impacts, and are referred to throughout the Draft MEIR as “the proposed Project at the Project Site”. The four potential development scenarios determined for the Add Area were

analyzed separately for potential environmental impacts, and are referred to throughout the Draft MEIR as the “development scenarios analyzed for the Add Area”. Therefore, within each impact section, a total of eight future potential development scenarios were analyzed. Analysis was conducted separately to differentiate between potential impacts resulting from the project applied for under CPC 2002-7295-PPR-BL filed December 17, 2002 (the proposed Project at the Project Site) and potential impacts resulting from the extrapolation of the General Plan Amendment and Zone Change to the Add Area properties, as requested by the City of Los Angeles (development scenarios analyzed for the Add Area). Potential impacts of the eight development scenarios were based on the worst-case scenario and, depending on economic conditions at the time of development, may be less than predicted.

Based on the final scope, a Draft MEIR was prepared for the Project. This Draft MEIR was circulated for public review for 45 days, from September 11, 2003 through October 27, 2003. Before approving a project, CEQA requires that the Lead Agency prepare and certify a Final Master Environmental Impact Report (Final MEIR). The required contents of a Final MEIR are specified in Section 15132 of the CEQA Guidelines, which states that the Final MEIR shall consist of:

- The Revised Draft MEIR or a revision of the Draft.
- Comments and recommendations received on the Revised Draft MEIR either verbatim or in summary.
- A list of persons, organizations, and public agencies commenting on the Revised Draft MEIR.
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- Any other information added by the Lead Agency.

The Lead Agency must provide each agency that commented on the Revised Draft MEIR a copy of the Lead Agency’s proposed response at least 10 days before certifying the Final MEIR.

This document, together with the Draft Master Environmental Impact Report Corbin and Nordhoff and Appendices Volumes I - III constitutes the “Final MEIR” for the Corbin and Nordhoff project. The Final MEIR is organized as follows:

- I. Introduction
- II. Summary
- III. Corrections and Additions
- IV. Comments and Responses
- V. Mitigation Monitoring Program

II. SUMMARY

A. PROJECT LOCATION

The Project Site is located at 19601 Nordhoff Street in the Chatsworth area of the City of Los Angeles, California, within the Chatsworth - Porter Ranch Community Plan Area. The Project Site is square in shape, consisting of approximately 35.5-acres. The Site is bounded by Prairie Street to the north, Corbin Avenue to the west, Nordhoff Street to the south, and Shirley Avenue to the east.

The Project Site includes an approximately eight acre parcel of land previously approved for the development of a senior housing facility. This parcel is located at the southeast corner of Prairie Street and Corbin Avenue.

The Los Angeles Department of City Planning (LADCP) staff requested that fifteen parcels of land, consisting of approximately fifteen acres (“Add Area”) be included as part of the analysis of the potential Zone Change and Plan Amendment. The Add Area is rectangular in shape and generally bounded by commercial properties that front Plummer Street to the north, Corbin Avenue to the west, Prairie Street to the south, and Shirley Avenue to the east. The Add Area is not under the Applicant’s control.

B. PROJECT DESCRIPTION

As defined by Section 15121 of the California Environmental Quality Act (CEQA) Guidelines, an Environmental Impact Report (EIR) is an informational document which will inform public agency decisionmakers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. Because the proposed Project will require approval of various discretionary actions by the City of Los Angeles, the proposed Project is subject to CEQA. The LADCP has been designated as the Lead Agency for the proposed Project under CEQA. Under CEQA Article 11, there are many variations of EIRs, as all environmental documents are intended to be tailored to different situations and project conditions.

The proposed Project at the Project Site includes a General Plan Amendment and Zone Change. While a specific development proposal has not yet been determined for the Project Site, a range of potential future development scenarios that will fit within the proposed Plan Amendment and Zone Change have been determined. Due to the nature of the proposed Project scenarios, it was determined by the Lead Agency that a Master Environmental Impact Report (MEIR) would be the most appropriate environmental document.

The MEIR (CEQA Section 15175) is intended to identify potential mitigation measures early to streamline later environmental analysis. As part of the Draft MEIR, a Project Area Initial Study was proposed to be utilized for subsequent projects if the MEIR is certified. At the time that a subsequent project is proposed at the Project Site or Add Area, an Environmental Assessment Form (EAF) must be filed with the LADCP. Following the filing of an EAF, LADCP will utilize the Project Area Initial Study to determine whether the subsequent project is in conformance with the analysis provided in the MEIR and whether the subsequent project is within the scope of the MEIR. After completion of the Project Area Initial Study, LADCP will determine all feasible mitigation measures identified in the MEIR that should be adopted as part of the approval of the subsequent project. Prior to a public hearing on the subsequent project, LADCP will provide notice of its intent to utilize the MEIR for the subsequent project. The content of this notice will include, but is not limited to, a brief description of the subsequent project; dates of the review period and locations where the MEIR can be reviewed; notice of any pending public meetings or hearings regarding the subsequent project; a list of significant environmental impacts anticipated as a result of the subsequent project; and the mitigation measures identified by LADCP to be adopted as part of the subsequent project approval. At the time of subsequent project approval, the Lead Agency will recertify the MEIR and make a formal finding of conformance of the subsequent project with the MEIR and make the identified mitigation measures a condition of the subsequent project approval.

The Draft MEIR was prepared for the proposed Project at the property located at 19601 Nordhoff Street, Los Angeles, California. The property is located within the Chatsworth - Porter Ranch Community Plan Area. The Project includes a General Plan Amendment from Light Industrial to Community Commercial and Zone Change from [T][Q]M1-1, MR2-1 and P-1 to C2-1 over 35.5 acres of land. The proposed Project at the Project Site also includes the previously approved Homeplace Retirement Community consisting of 389 senior housing units and 35 assisted living units.³ The Project Site is currently under the control of the applicant and the current tenant plans to vacate the Site upon termination of the lease in 2005 or possibly sooner. While a specific development scenario has not been determined for the Project Site, for planning and analysis purposes, four potential worst-case development scenarios have been identified as follows:⁴

³The Homeplace Retirement Community included 389 senior housing units and 35 assisted living units at the time the EIR was prepared. However, the revised application for the Homeplace facility included 390 senior housing units and 35 assisted living units, within 505,000 square feet.

⁴Development scenarios for the project site were determined based on the assumption that surface parking would be provided for retail services and structured parking would be provided for commercial services. Additionally, it was assumed that any retail development on site would not exceed three stories. Based on these assumptions, the amount of parking that could fit on the project site was determined. The corresponding square footage of floor area for retail and office use was calculated. Potential development scenarios that include residential units were also determined. These square footage calculations were then extrapolated to the Add Area properties (total acreage) to determine the allowable floor area for retail, office, and residential land uses.

Scenario 1: Retail

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930,000 square feet Office
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Scenario 4: Office/Residential

690,000 square feet Office
300 Condominium units
389 Senior Housing units
35 Assisted Living units

The potential development scenarios were determined under the following assumptions:

- Due to the additional cost associated with mechanical and emergency systems, that the proposed development will not exceed six stories or seventy-five feet in height.
- Surface parking would be provided for all retail uses, and structured parking would be provided for all office and residential uses.
- Due to the cost associated with soil conditions, ground water, potential liquefaction and land value, development proposed for the southern half of the Project Site will not include subterranean levels, such as basement levels or subterranean parking. However, subterranean parking could occur on the northwestern portion of the Project Site that is not affected by liquefaction, in association with the Homeplace Retirement Community.
- Parking associated with the proposed commercial development will adhere to the City of Los Angeles Code requirements.
- Vehicular access to the project area will be provided from each of the following roadways: Prairie Street, Corbin Avenue, Nordhoff Street, and Shirley Avenue. It is anticipated that full access (both ingress and egress) turning movements will be accommodated at the project driveways.
- The proposed development build out year for the Project Site is 2005.
- The proposed Project at the Project Site will be constructed primarily in one phase. However, ancillary buildings may be added after the initial construction. The length of construction cannot be accurately estimated until the project design is finalized.

- The proposed Homeplace Retirement facility, previously approved for the northwestern corner of the Project Site (ZA 2002-6851-ZV), consisting of approximately 389 independent senior housing units and 35 assisted living units could be fully constructed prior to full development of the proposed Project.

Each of the potential development scenarios was analyzed for probable environmental impacts. In many of the environmental impact sections, the identified impacts of the potential development scenarios were similar. Where the impacts of the potential development scenarios were similar, there is a single discussion of the impacts. Where the impacts of the potential development scenarios were dissimilar, there is a discussion of the impacts of each of the potential development scenarios. Where there is a discussion of each of the potential development scenarios, the scenario with the most significant impact is identified and utilized in determining the level of significance of the environmental impact and the appropriate mitigation measures.

The LADCP staff identified fifteen properties located to the north of Prairie Street (Add Area), comprising approximately fifteen acres, for a potential additional area to coincide with the General Plan Amendment and Zone Change at the Project Site. As a result, potential environmental impacts resulting from the development scenarios analyzed for this Add Area have been included using the same development assumptions as the Project Site. The Add Area properties are not currently under the applicant's control and each property has a separate owner. Application and initiation of project proposals can either be completed by the LADCP or the Add Area property owners. While a specific development scenario has not been determined for the Add Area, for planning and analysis purposes, the following potential development scenarios have been determined and were analyzed throughout the document:

Scenario 1: Retail

200,000 square feet Retail

Scenario 2: Office

586,000 square feet Office

Scenario 3: Retail/Residential

150,000 square feet Retail

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An Environmental Assessment Form (EAF) was submitted on March 11, 2002. A preliminary scope of significant impacts for the Draft MEIR was determined by the LADCP, Environmental Review Section (ERS). Due to the size of the Project, it was determined that an EIR would be required and an Initial Study was not prepared. The LADCP ERS circulated a Notice of Preparation (NOP) from May 23 to June 24, 2002 and held a Public Scoping Meeting on June 4, 2002 at California State University–Northridge to elicit comments regarding the proposed scope of the EIR. A final scope for the Draft MEIR included the following areas of potential impact:

- Aesthetics
- Geology and soils
- Land use and planning
- Recreation
- Air quality
- Hazardous materials
- Noise
- Transportation
- Biological resources
- Hydrology
- Population/housing
- Utilities

The following environmental impact areas were determined to be less than significant and were therefore not analyzed in the Draft MEIR: agricultural resources, cultural resources, and mineral resources. This determination was made by the LADCP based on the lack of identification of a substantial concentration of these resources in the General Plan Framework EIR, the developed nature of the Project Site and Add Area, and the considerable length of time that the Project Site and Add Area have been developed.

The four development scenarios proposed for the Project Site were analyzed for potential environmental impacts, and are referred to throughout the document as “the proposed Project at the Project Site”. The four potential development scenarios determined for the Add Area were analyzed separately for potential environmental impacts, and are referred to throughout the document as the “development scenarios analyzed for the Add Area”. Therefore, within each impact section, a total of eight future potential development scenarios were analyzed. Analysis was conducted separately to differentiate between potential impacts resulting from the project applied for under CPC 2002-7295-PPR-BL filed December 17, 2002 (the proposed Project) and potential impacts resulting from the extrapolation of the General Plan Amendment and Zone Change to the Add Area properties, as requested by the City of Los Angeles (development scenarios analyzed for the Add Area). Potential impacts of the eight development scenarios were based on the worst-case scenario and, depending on economic conditions at the time of development, may be less than predicted.

As required by CEQA, this Draft MEIR must assess both impacts generated by the anticipated development and the potential cumulative impacts on the environment of the proposed Project combined with applicable related projects. It should be noted that cumulative impacts for this Draft MEIR were assessed based on the proposed Project at the Project Site combined with related projects, the development scenarios analyzed for the Add Area combined with related projects, and then the potential cumulative impact of related projects combined with both the proposed Project at the Project Site and the development scenarios analyzed for the Add Area.

The City of Los Angeles has adopted thresholds of significance (LA CEQA Thresholds Guide) to assist City Departments in assessing the level of significance of environmental impacts resulting from development projects within the City. These thresholds were applied throughout this Draft MEIR. However, for individual environmental impact sections, where appropriate, additional thresholds were utilized to further determine potential impacts of the proposed Project at the Project and the development scenarios analyzed for the Add Area. For each impact section, mitigation measures proposed to reduce significant impacts to a less than significant level are identified as Office(O), Retail(C), and/or Residential(R) corresponding to the type of development that will trigger the mitigation measure.

C. SUMMARY OF IMPACTS AND MITIGATION MEASURES

1. AESTHETICS

ENVIRONMENTAL IMPACTS

Project Site

Current views looking westward from Shirley Avenue include the foreground, middleground, and background; looking northward from Nordhoff Street include the foreground and very limited portions of the background; looking southward from Prairie Street include the foreground and background; and looking eastward from Corbin Avenue include the foreground.

Due to the existing low rise development on the southern portion of the Project Site and the vacancy of the northern portion of the Project Site, development of six stories or 75 feet in height could result in a significant impact on foreground, some middleground, and background views from and into the Project Site. However, current views in the area include existing industrial and office developments that are not considered significant by the Community Plan. Far background views of the Santa Susana Mountains that are not identified by the Plan as significant but might be considered desirable by the community are sporadic and located at such a distance from the Project Site that the proposed development would not result in a significant impact to these background views. Therefore, the proposed development at the Project Site will result in a less than significant impact on views due to incompatibility with the Community Plan.

The proposed zoning for the Project Site is C2-1. This zoning designation allows for unlimited height and an FAR of 1.5: 1. The existing zone designation allows for unlimited height. Buildings on properties adjacent to the Project Site are two and three-stories in height. However, buildings of six, eight and ten stories are located in the nearby project area within the viewshed. Therefore, proposed development of six stories or 75 feet would not exceed allowable height or zoning regulations and will result in a less than significant impact to views due to incompatibility with zoning regulations.

The project area is currently characterized as a major commercial corridor. The Project would result in continuity with the current commercial nature of the project area. This would not eliminate any natural feature in the area. Further, the Project proposes to continue an existing use and will not result in the insertion of a prominent feature that would change the existing visual character of the area. Therefore, the proposed Project at the Project Site will result in a less than significant impact to the visual character of the area.

The western San Fernando Valley is developed with no significant views identified by the Community Plan. Further, the Project Site has been developed for over 30 years with office and industrial buildings. The Project Site is surrounded by developed commercial, retail, and

industrial building to the north, west, south, and east. The proposed construction will be similar style, density, height, bulk, and setback to existing buildings in the area. Therefore, the proposed Project at the Project Site will result in a less than significant impact to the existing aesthetic image or value of the area.

Add Area

Current views looking westward from Shirley Avenue include the foreground, middleground, and background; looking northward from Nordhoff Street include foreground and very limited portions of the background; looking northward from Prairie Street include the foreground and limited views of the background; looking southward from Plummer Street include the foreground and limited views of the background; and looking eastward from Corbin Avenue include the foreground.

The development scenarios analyzed could result in construction of buildings six stories or 75 feet in height. Due to the existing low rise development of the Add Area, development of six stories or 75 feet in height could result in a significant impact on foreground views into the Add Area and background views from this location. However, views in the area are of retail, industrial and office developments that are not considered significant by the Community Plan. Far background views of the Santa Susana and Santa Monica Mountains that can be seen from portions of the Add Area are sporadic and located at such a distance from the Add Area that the proposed development would not result in a significant impact to these background views. Therefore, the development scenarios analyzed for the Add Area will result in a less than significant impact on views due to conflict with the Community Plan.

The proposed zoning for the Add Area is C2-1. This zoning designation allows for unlimited height and an FAR of 1.5: 1. Buildings on properties adjacent to the Project Site are two and three-stories in height. However, buildings of six, eight and ten stories are located in the nearby project area within the viewshed. Therefore, a proposed development of six stories or 75 feet in height would not exceed allowable height or zoning regulations and will result in a less than significant impact to views due to non-compliance zoning regulations.

The project area is characterized as a major commercial corridor. There are no natural features or significant views in the project area. The development scenarios analyzed for the Add Area would result in continuity with the current commercial and enclosed industrial nature of the Add Area and project area. This would not eliminate any natural feature in the area. Further, the development scenarios propose to continue an existing office-type use and will not result in the insertion of a prominent feature that would change the existing visual character of the area. Therefore, the development scenarios analyzed for the Add Area will result in a less than significant impact to the visual character of the area.

The western San Fernando Valley is developed with no significant views identified by the Community Plan. Further, the Add Area has been developed with office and industrial buildings for several decades. The Add Area is surrounded by developed commercial, retail, and industrial building to the north, west, south, and east. Construction will be similar style, density, height, bulk, and setback to existing buildings in the area. Therefore, the development scenarios analyzed for the Add Area will result in a less than significant impact to the existing aesthetic image or value of the area.

MITIGATION MEASURES

Although no significant impacts to views in the project area have been identified, environmental impacts to the character and aesthetics of the area may result from Project implementation at the Project Site and Add Area. However, potential impacts will be mitigated to a less than significant level by the following measures:

1. A master landscape plan for the entire Site shall be prepared by a licensed landscape architect and submitted to the LADCP for review and approval prior to the issuance of any building permit for a structure. A detailed landscape and irrigation plan shall be prepared for each individual building. (O, C, R)
2. A minimum of one 24-inch box tree (minimum trunk diameter of two inches and a height of eight feet at the time of planting) shall be planted for every four new or reconstructed surface parking spaces. (O, C, R)
3. The owners shall maintain the subject property clean and free of debris and rubbish and to promptly remove any graffiti from the walls, pursuant to Municipal Code Sections 91.8101-F, 91.8904-1, and 91.1707-E. (O, C, R)
4. Exterior walls of new commercial and residential buildings of other than glass may be covered with clinging vines, screened by oleander trees or similar vegetation capable of covering or screening entire walls up heights of at least 9-feet, excluding windows and signs. (O, C, R)
5. Screening of rooftop equipment, to preclude visibility of mechanical equipment from nearby residential areas and the street, shall be incorporated into the building design of each structure. (O, C, R)
6. Outdoor lighting shall be designed and installed with shielding, so that the light source cannot be seen from nearby residential properties. (O, C, R)

LEVEL OF IMPACT AFTER MITIGATION

Less Than Significant.

CUMULATIVE IMPACTS

Related Projects

Related projects may have a potentially significant impact on the existing viewshed. However, as shown in **Figure 5: Related Projects**, related projects are located at a minimum of one half mile from the Project Site. None of the related projects are located within the direct viewshed of the Project Site and Add Area. Further, none of the related projects is of significant height, massing, or bulk to affect the project viewshed from their locations.

Related projects may also have the potential to significantly impact the existing visual character of the area. Due to the developed, urban nature of the San Fernando Valley, Related Projects 1,2,3,6,7,9, and 10 would not have a significant impact on the visual character of project area. However, within the Porter Ranch area, located approximately 3.0 miles north of the Project Site, some undeveloped land still exists. Related Projects 4 and 5, located in this area, could result in a potentially significant impact to the visual character of the Porter Ranch area due to the existing undeveloped nature of that area. However, Related Projects 4 and 5 are located a minimum of three miles north of the Project Site and will not significantly affect the visual character of the immediate project area. Therefore, related projects will result in a less than significant impact to the viewshed or visual character of the project area.

Proposed Project, Add Area, and Related Projects

The proposed Project at the Project Site and development scenarios analyzed for the Add Area, in combination with related projects, will result in a less than significant impact to the existing viewshed or visual character of the project area. Therefore, a significant cumulative impacts to aesthetics is not anticipated.

2. AIR

CONSTRUCTION PHASE IMPACTS

Project Site Only

Estimated daily construction emissions for the proposed Project at the Project Site Only are anticipated to exceed the SCAQMD threshold for ROG during the finishing phase. Estimated daily construction emissions for Scenario 1: Retail Project Site Only are anticipated to exceed the SCAQMD threshold for PM10 during the Grading/Excavation phase. The proposed Project at the

Project Site could result in a significant impact to air quality during construction activities. However, implementation of the proposed mitigation measures, including implementation of SCAQMD Rule 403, will reduce any construction air quality impacts to a less than significant level.

Full Build Out Project

Estimated daily construction emissions for the Full Build-Out scenarios are anticipated to exceed the SCAQMD threshold for ROG during the finishing phase and PM10 during the Grading/Excavation Phase. The proposed Full Build Out Project could result in significant impacts to air quality during construction activities. However, with implementation of the proposed mitigation measures, including SCAQMD Rule 403, will reduce any construction air quality impacts to a less than significant level.

CONSTRUCTION PHASE MITIGATION MEASURES

A significant construction air quality impact will result from the proposed full build out Project. However, the following mitigation measures will reduce any potential impacts to the greatest extent possible:

7. The construction area and vicinity (500-foot radius) shall be swept (preferably with water sweepers) and watered at least twice daily. Site-wetting shall occur often enough to maintain a 10 percent surface soil moisture content during all earth-moving activities. (O, C, R)
8. All unpaved roads, parking, and staging areas shall be watered at least once every two hours of active operations. (O, C, R)
9. Site access points shall be swept/washed within thirty minutes of visible dirt deposition. (O, C, R)
10. On-site stockpiles of debris, dirt, or rusty material shall be covered or watered at least twice daily. (O, C, R)
11. All trucks hauling soil, sand, and other loose materials shall covered. (O, C, R)
12. All haul trucks shall have a capacity of no less than twelve and three-quarter (12.75) cubic yards. (O, C, R)
13. At least 80 percent of all inactive disturbed surface areas shall be watered on a daily basis when there is evidence of wind-driven fugitive dust. (O, C, R)
14. Operations on any unpaved surfaces shall be suspended when winds exceed 25 mph. (O, C, R)

15. Traffic speeds on unpaved roads shall be limited to 15 miles per hour. (O, C, R)
16. Operations on any unpaved surfaces shall be suspended during first and second stage smog alerts. (O, C, R)
17. Haul truck routes shall be planned to avoid residential areas, schools, and parks. (O, C, R)
18. The proposed Project shall use coating transfers or spray equipment with a transfer efficiency rate of no less than 65 percent. (O, C, R)
19. A person shall not cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that the presence of such dust remains visible in the atmosphere beyond the property line of the emission source. (O, C, R)
20. Any person in the South Coast Air Basin shall:
 - (A) prevent or remove within one hour the track-out of bulk material onto public paved roadways as a result of their operations; or (O, C, R)
 - (B) take at least one of the actions listed from SCQAMD Rule 403 and: (O, C, R)
 - (i) prevent the track-out of bulk material onto public paved roadways and remove such material at any time track-out extends for a cumulative distance of greater than 50 feet on any paved public road during active operations; and
 - (ii) remove all visible roadway dust tracked-out upon public paved roadways as a result of active operations at the conclusion of each work day when active operations cease.

LEVEL OF CONSTRUCTION IMPACTS AFTER MITIGATION

With implementation of the proposed mitigation measures, the proposed development scenarios at the Project Site and Add Area will result in a less than significant construction air quality impact.

OPERATIONAL PHASE IMPACTS

Project Site Only

Operation emissions from the proposed Project at the Project Site are anticipated to exceed the SCAQMD significance threshold for ROG, NO_x, and CO. Therefore, the proposed Project at the Project Site may result in significant operational air quality impacts.

Full Build Out Project

Operational emissions from the Full Build Out Project at the Project Site and Add Area are anticipated to exceed the SCAQMD significance threshold for CO, ROG, and NO_x. Therefore, the Full Build Out Project at the Project Site and Add Area would result in significant operational air quality impacts.

OPERATIONAL PHASE MITIGATION MEASURES

A significant impact to air quality will result due to operation of the proposed full build out Project. However, any potential impacts will be mitigated to the greatest extent possible by the following measures:

21. A person conducting active operations within the boundaries of the South Coast Air Basin shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type which is part of the active operation. (O, C, R)
20. Any person in the South Coast Air Basin shall:
 - (A) prevent or remove within one hour the track-out of bulk material onto public paved roadways as a result of their operations; or (O, C, R)
 - (B) take at least one of the actions listed from SCQAMD Rule 403 and: (O, C, R)
 - (i) prevent the track-out of bulk material onto public paved roadways as a result of their operations and remove such material at anytime track-out extends for a cumulative distance of greater than 50 feet on to any paved public road during active operations; and
 - (ii) remove all visible roadway dust tracked-out upon public paved roadways as a result of active operations at the conclusion of each work day when active operations cease.
22. The proposed Project shall include bicycle parking facilities, such as bicycle lockers and racks. (O, C)

LEVEL OF OPERATIONAL IMPACTS AFTER MITIGATION

Daily operational emissions after implementation of mitigation measures would still exceed SCAQMD significance thresholds for CO, ROG, and NO_x. Therefore, the proposed Project Site Only and Full Build Out Projects could result in a significant and unavoidable impact to air quality during the operational phase.

CONSISTENCY WITH THE AIR QUALITY MANAGEMENT PLAN

Criteria for determining consistency with the Air Quality Management Plan (AQMP) is defined in Chapter 12, Section 12.2 and Section 12.3, of the South Coast Air Quality Management District's CEQA Air Quality Handbook.

Consistency Criterion No. 1: *The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

Consistency Criterion No. 2: *The proposed Project will not exceed the assumptions in the AQMP in 2010 or increments based on the year of project build-out phase.*

Project Site Only

Consistency Criterion No. 1 Consistency Criterion No. 1 refers to violations of the CAAQS. The SCAQMD has identified CO as the best indicator pollutant for determining whether air quality violations would occur since it is most directly related to automobile traffic. The CO hotspot analysis indicates that the development scenarios would not exacerbate existing violations of the State CO concentration standard and no significant adverse impacts are anticipated. Therefore, the proposed development scenarios comply with Consistency Criterion 1.

Consistency Criterion No. 2 The AQMP growth assumptions are generated by the Southern California Association of Governments (SCAG). SCAG derives its assumptions, in part, from the general plans of cities located within the SCAG region. Therefore, if a project does not exceed the growth projections in the general plan, it is consistent with the growth assumptions in the AQMP.

The proposed development scenarios would not exceed the City of Los Angeles General Plan or SCAG growth projections for population, housing, and employment. Thus, the proposed development scenarios are considered consistent with the growth assumptions in the AQMP and complies with Consistency Criterion No. 2. Therefore, the proposed development scenarios are considered consistent with the AQMP.

CUMULATIVE IMPACTS

Related Projects

Related projects in the project area were included in the air quality analysis conducted for the proposed Project.

Proposed Project, Add Area, and Related Projects

As discussed above, related projects were included in the air quality analysis conducted for the proposed development scenarios. As shown in the impact analysis section, the proposed development scenarios would result in a less than significant construction air quality impact. The proposed development scenarios would result in a significant operational air quality impact. Therefore, a significant cumulative operational air quality impact is anticipated.

3. BIOLOGICAL RESOURCES

ENVIRONMENTAL IMPACTS

Due to the existing urban development on and around the project area, the amount of impervious surface at the Project Site and Add Area, and the length of time that these conditions have existed, there are no known or identified biological resources, including endangered or threatened species, on the Project Site or Add Area. Additionally, the City of Los Angeles Citywide General Plan Framework EIR does not identify the project area as a Biological Resource Area, an area known for providing habitat for threatened or endangered species. The project area is not located within an existing or proposed Significant Ecological Area (SEA) known for providing habitat and movement corridors for both endangered and non-endangered species. Therefore, the proposed development scenarios at the Project Site and Add Area will result in a less than significant biological resources impact due to the loss or destruction or listed endangered, threatened, rare, protected, candidate, or sensitive species or their habitats and will not interfere with the movement of wildlife.

MITIGATION MEASURES

Environmental impacts from project implementation may result due to the loss of trees on the Project Site. However, potential impacts will be mitigated to a less than significant level by the following measure:

23. Any tree removed from the Site will be replaced at a 1:1 ratio, by a minimum of 24-inch box tree, as required by the City of Los Angeles Code of Regulations. (O, C, R)

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

Although no biological issues are known to exist at related Project Sites due to the urban nature of the San Fernando Valley, any significant impacts must be determined on a project specific basis.

Project Site, Add Area, and Related Projects

A significant cumulative biological resources impact is not anticipated.

4. GEOLOGIC HAZARDS

The Project Site and Add Area are located in the northwestern portion of the alluvium-filled San Fernando Valley. The area is surrounded by the Santa Monica Mountains to the south, the Santa Susana Mountains to the northwest, the Simi Hills to the west, the San Gabriel Mountains to the northeast, and the Verdugo Mountains to the east.

ENVIRONMENTAL IMPACTS

Although the most recent depth to groundwater beneath the project area is estimated between approximately 41 to 66 feet, water levels could reach the historic high of 35 to 40 feet in the future. Based on historic groundwater levels in nearby wells, there is a potential for shallow groundwater to have an adverse impact on the proposed development.

The Project Site and Add Area are not located within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. Based on available geologic data, active or potentially active faults with the potential for surface fault rupture are not known to be located directly beneath or projecting toward the Project Site or Add Area. The Project Site and Add Area could be subjected to strong ground shaking in the event of an earthquake however, this hazard is common in Southern California and can be mitigated.

According to the City and County of Los Angeles Safety Elements, the Project Site and Add Area are not within an area identified as having a potential for slope instability.

According to the California Division of Mines and Geology, the southern portion of the Project Site is located within an area identified as having a potential for liquefaction. However, the northern portion of the Project Site and the Add Area are not within an area identified as having a potential for liquefaction. As a result, a site specific liquefaction analysis must be completed prior to completion of the proposed Project.

The project area is not located within an area of potential inundation by earthquake induced dam failure, a coastal area, or an area prone to flooding. Therefore, the proposed development scenarios will result in a less than significant geologic hazards impact to the project area due to tsunamis, seiches, and flooding.

The Project Site is not within an area of known subsidence associated with fluid withdrawal (groundwater or petroleum), peat oxidation, or hydrocompaction.

MITIGATION MEASURES

Seismic

Environmental impacts may result to the safety of future occupants at the Project Site and Add Area due to the location of the Project Site and Add Area within an area of potential seismic activity. However, any potential impacts will be mitigated to a less than significant level by the following measure:

24. The design and construction of the Project at the Project Site and Add Area shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety. (O, C, R)

Liquefaction

Environmental impacts may result due to the location of a portion of the Project Site within a designated liquefaction zone. However, any potential impacts will be mitigated to a less than significant level by the following measure:

25. Potential impacts from liquefaction may arise on the southern portion of the Project Site which is within a designated liquefaction zone. Building design shall comply with the Uniform Building Code Chapter 18, Division 1, Section 1804.5 Liquefaction Potential and Soil Strength Loss, requirements for the preparation of a building specific geotechnical report assessing potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement, or reduction in foundation soil-bearing capacity, and discussion of mitigation measures that may include building design consideration. Building design considerations may include, but are not limited to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. (O, C, R)

Subsidence

Although a specific significant impact has not been identified for the Project Site or Add Area, environmental impacts may result from project implementation due to the location of the project in an area prone to subsidence. However, any potential impact will be further reduced to a less than significant impact with the following mitigation measure:

26. Prior to the issuance of building or grading permits, the applicant shall submit a geotechnical report prepared by a registered civil engineer or certified engineering geologist to the Department of Building and Safety for approval. (O, C, R)

Grading

For potential impacts and mitigation measures regarding grading and earth movement, see **Section IV B: Air Quality**.

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

The project area and related Project Sites would be subject to potential ground shaking, a common hazard in Southern California. Due to the distance between related projects sites and the project area, related projects are not anticipated to present a seismic impact to the proposed development scenarios.

Project Site, Add Area, and Related Projects

The proposed Project at the Project Site and development scenarios analyzed for the Add Area will result in a less than significant geologic hazards impact. Seismic impacts resulting from related projects must be identified on a site specific basis. Therefore, a significant cumulative geologic hazards impact is not anticipated.

5. HAZARDOUS MATERIALS AND HAZARDOUS WASTE

The LAFD has identified that hazardous materials have been used, stored, and disposed of within the Project Site and Add Area. These materials would be stored and dispensed in accordance with state and local regulations and industry standards. By complying with the generally applicable administrative procedures required by the municipal code, including the requirement to maintain a copy of the Business Emergency Response Plan on file with the LAFD and the

industry wide safety procedures for the use and storage of these materials, the Project will result in a less than significant impact due to hazardous materials. Development on the Project Site or Add Area would be required to develop and maintain a Business Plan if it handles or intends to handle a hazardous material or a mixture containing a hazardous material in the City which has a quantity at any one time during the reporting year equal to, or greater than, a total weight of 500 pounds, or a total volume of 55 gallons, or 200 cubic feet at standard temperature and pressure for a compressed gas; or exceeds the applicable federal threshold planning quantity for an Extremely Hazardous Substance specified in Title 40, CFR, Par 355, Appendix A.⁵

Contaminated soil is not known to exist on site from previously reported accidents and was not identified during the Phase I investigation. A regulatory agency database search identified hazardous substance and/or hazardous waste sites within the ASTM specified distances of the Project Site. However, all cases identified are either closed or under remediation and are unlikely to impact the environmental integrity of the Project Site and Add Area at this time.⁶ Therefore, with proper site investigation of the Project Site and Add Area with respect to possible soil contamination prior to demolition and adherence to code requirements, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will not result in cumulative impacts to soil contamination.

Groundwater contamination was not identified on the Project Site or adjacent properties, including the Add Area, during the Phase I investigation performed. Groundwater contamination due to a hazardous materials release on-site or in the project area is not anticipated as a result of the proposed Project at the Project Site or development scenarios analyzed for the Add Area. With proper investigation of groundwater conditions prior to demolition and adherence to code requirements, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will not result in significant cumulative impacts to groundwater.

However, due to the age of the existing structures on the Project Site and Add Area, the potential for asbestos and lead-based paint does exist. A survey of asbestos containing materials and lead based paint was not included in the scope of the Phase I Environmental Assessment conducted. The demolition of any structures with asbestos containing materials or lead-based paint would have the potential to release these substances if they are not properly stabilized or removed prior to demolition activity. Therefore, a significant hazardous materials impact due to the occurrence of asbestos containing materials and lead-based paint on site could occur. With incorporation of

⁵City of Los Angeles Municipal Code: Chapter V-Public Safety, Article 7, Sec. 57.08.03.
http://cityfolio.ci.la.ca.us/cgi-bin/om_isapi.dll?clientID=130720&advquery=172%2c043&infobase=municipal%20codes&record={518F}&softp age=Doc_Frame_Pg42&x=26&y=20. July 31, 2002.

⁶Studies provided by American Environmental Specialist, Co. include Phase I Environmental Site Assessment - Litton Guidance and Control Facility, October 7, 1996; Phase I Environmental Site Assessment Update - Litton Guidance and Control Facility, April 9, 1999; Phase I Environmental Assessment - Southeast Corner of Prairie Street and Corbin Avenue, October 7, 1996; and Phase I Environmental Assessment Update - Proposed New Parcel Southeast Corner of Prairie Street and Corbin Avenue, March 10, 1999.

the proposed mitigation measures to appropriately stabilize and/or remove asbestos containing materials and lead-based paints, any potential impact would be reduced to a less than significant level. Therefore, a significant cumulative hazardous materials impact due to the release of asbestos containing materials or lead based materials is not anticipated.

MITIGATION MEASURES

Due to the age of the building(s) to be demolished, asbestos-containing materials (ACM) may be located in the structure. Exposure to ACM during demolition could be hazardous to the health of the demolition workers as well as area residents and employees. However, these impacts can be mitigated to a less than significant level by the following measure:

27. Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACM are present in the building. If ACM are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and regulations. (O, C, R)

Environmental impacts may result from project implementation due to the use, storage, and creation of hazardous materials. However, these impacts can be mitigated to a less than significant level by the following measure

28. Prior to the issuance of the Certificate of Occupancy, the applicant shall provide a letter from the LAFD stating that the agency has been permitted the facility's use, storage, and creation of hazardous substances. (O, C, R)

Environmental impact may result from project implementation due to the creation or spread of soil contamination. However, these impacts can be mitigated to a less than significant level by the following measure:

- 28a. If during construction of the project, soil contamination is encountered, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exist, a registered geologist should be contacted to examine the contaminated materials and prepare a report on the findings of a soil analysis. This report should identify which government agency will provide regulatory oversight.

IMPACTS AFTER MITIGATION

Any adverse effects of the proposed Project related to soil and/or groundwater contamination, and asbestos or lead-based paint, would be avoided with implementation of the recommended

mitigation measures. This is because adherence to the recommended mitigation measures would: (1) avoid project demolition or construction prior to remediation of listed hazardous material/waste sites, sites of potential concern, or sites which exceed maximum regulatory requirements for hazardous materials; and (2) avoid project demolition of any existing structures found to contain asbestos or lead-based paint prior to appropriate stabilization and/or removal of such materials in accordance with applicable regulations.

CUMULATIVE IMPACTS

Related Projects

Due to the inherently industrial nature of the project area, it is anticipated that hazardous materials will continue to be transported, used, and disposed of in the project area. However, none of the related projects identified in the project area include the development of additional industrial lands or operations.

Two of the related projects have been identified as residential projects that may increase the resident population which could be adversely affected by a release of existing hazardous materials: Porter Ranch and Deer Lake Ranch. Both of these projects are located north of the SR-118 freeway. Due to the distance between the Project Site and proposed related projects, groundwater and/or soil contamination on the Project Site or Add Area that could be released as a result of new development will not adversely affect these developments.

The closest related project to the Project Site and Add Area is Related Project 9, the Northridge Office Building. However, this project is located approximately one half mile west of the Site. Due to the distance between the related Project Site and the Project Site and Add Area, the proposed Project will result in a less than significant impact on related projects due to a release of hazardous materials.

Proposed Project, Add Area, and Related Projects

Due to the inherently industrial nature of the project area, it is anticipated that hazardous materials will continue to be transported, used, and disposed of in the project area. However, the proposed Project at the Project Site and Add Area in combination with related projects, do not include the addition of industrially-designated land or operations. Therefore, a significant cumulative impact to the project area as a result of hazardous materials is not anticipated.

6. HYDROLOGY

ENVIRONMENTAL IMPACTS

The proposed development will result in an increase in the amount of impervious surface on the Project Site due to the removal of a small stand of trees located on the Project Site. However, the drainage pattern will substantially remain the same. Further, due to the developed and impervious nature of the rest of the Project Site, Add Area, and the surrounding San Fernando Valley, the removal of this small piece of undeveloped land will increase the downstream flow by an unsubstantial amount, approximately 1 cfs or 0.4 percent of the existing capacity. Therefore, the proposed Project will result in a less than significant impact to hydrology in the area based on alteration of the movement or quantity of surface water sufficient to produce a substantial change in the current or direction of water flow.

MITIGATION MEASURES

Although no significant impacts to hydrology have been identified, environmental impacts to water quality and flow may result from the proposed Project at the Project Site and development scenarios analyzed for the Add Area. Further, in the event that development includes a restaurant facility at either the Project Site or Add Area, environmental impacts may result from the release of toxins into the stormwater drainage channels during the routine operation of restaurants, bakeries, and food producers.

However, the potential impacts will be mitigated to a less than significant level by incorporating stormwater pollution control measures. Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control which requires the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavation, and fills. Applicants must meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board, including the following: (a copy of the SUSMP can be downloaded at <http://www.swrcb.ca.gov/rwqcb4/>)

29. Project applicants are required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24 hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required. (O, C, R)

30. The owner of the property will prepare and execute a covenant and agreement satisfactory to the Department of City Planning binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan. (O, C, R)
31. Runoff must be treated prior to release into the storm drain. Three types of treatments are available: (1) dynamic flow separator, (2) filtration, (3) infiltration. Dynamic flow separator uses hydrodynamic force to remove debris, and oil and grease, and are located underground. Filtration involves catch basins with filter inserts. Filter inserts must be inspected every six months and after major storms, cleaned at least twice a year. Infiltration methods are typically constructed on site and are determined by various factors such as soil types and groundwater table. (O, C, R)
32. Prior to the issuance of building permits for replacement buildings or new parking areas within the Add Area, a hydrologic analysis shall be conducted to determine if the project will create additional runoff. If the project proposed at that time will generate additional runoff, an analysis must be conducted to determine if the existing storm drain has adequate capacity to accommodate the additional runoff. If the existing system can not provide adequate capacity, the applicant at that time may be required to install a relief sewer along Shirley Avenue southward from Prairie Street to Teledyne Way. (O, C, R)
33. Cleaning of oily vents and equipment to be performed within a designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications. (C)
34. Store trash dumpsters either under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids. Wash containers in an area with properly connected sanitary sewer. (C)
35. Reduce and recycle wastes, including oil and grease. (C)
36. To prevent downstream flooding, the existing ridge along the westerly property boundary shall be maintained unless additional storm drains capable of accommodating additional flow are developed. (O, C, R)

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

Properties that may undergo substantial changes in the existing impervious conditions are of concern to stormwater hydrology in the project area. Due to the existing urban and fully-developed nature of the project area, there are few areas that could significantly alter the existing hydrologic conditions of the area. However, areas to the north of the Project Site and Add Area, primarily north of State Route 118, including the Porter Ranch and Deer Lake Ranch related projects, include unadulterated natural lands that, as a result of development, could change stormwater hydrology in the area.

The Porter Ranch related project (No. 4) does contain natural, vegetated lands that upon development, could cause a change in stormwater hydrology. It was determined in the Porter Ranch Specific Plan EIR that build out of the specific plan area would increase the amount of runoff from a 50-year-frequency storm. However, this runoff would be controlled by storm drain systems designed in accordance with the standards of the City of Los Angeles Department of Public Works. With the application of all mitigation measures outlined in the Porter Ranch EIR and adherence to the recommendations and requirements of the responsible agencies, impacts would be reduced to a less than significant level. Stormwater collected in the Porter Ranch area will be piped southward by the Oakdale Drain, extending southward from the Porter Ranch area, eastward along Devonshire Street, and southward along Winnetka Avenue where it connects with the Limekiln Creek Channel. Therefore, as determined by the EIR prepared for the Porter Ranch Specific Plan, related project No. 4 will result in a less than significant impact to people, property, or sensitive biological resources due to stormwater hydrology. Further, it will not 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.

Other related projects upstream of the proposed Project include Deer Lake Ranch (No. 5) and the proposed Northridge office building (No. 9). Deer Lake Ranch is located west of Browns Canyon Wash to which future stormwater from this development would flow. The proposed Northridge Office building site is located in a fully-developed, urban area. Due to the existing impervious nature of the area, this related project will not increase the quantity of stormwater in the area. Therefore, related projects would result in a less than significant impact to stormwater hydrology in the project area.

Proposed Project, Add Area, and Related Projects

Based on the existing fully-developed, urban nature of the project area, the proposed Project at the Project Site and development scenarios analyzed for the Add Area, in combination with related projects, would result in a less than significant impact on hydrology due to an increase in stormwater quantity, substantial change in the direction of stormwater flow, or damage due to insufficient flood control.

7. LAND USE

Zoning

All of the commercial and residential uses included in the proposed development scenarios are allowable under the C2-1 zoning designation. The C2-1 zoning designation is with Height District 1, which allows for unlimited height and a 1.5 Floor Area Ratio (FAR). The Project Site covers approximately 1,546,400 square feet (35.5 acres) of land area, which allows for a floor area of approximately 2,319,600 square feet. The maximum yield of the proposed development scenarios is approximately 1,668,000 square feet⁷ of floor area on the Project Site, or an FAR of 1.08:1. The proposed FAR would not exceed the FAR allowed by the proposed zoning. Further, based on the unlimited height district, the proposed Project at the Project Site will not exceed the allowable development height. As a result, with the approval of a General Plan Amendment and Zone Change, the proposed Project will result in a less than significant impact as a result of inconsistencies with the existing and proposed zoning.

Due to the fact that the remaining uses at the Project Site are of an office nature, a Zone Change from MR2-1 to C2-1 would not result in a legal non-conforming use on the Site. As a result, the proposed Project at the Project Site would not create a substantial conflict with relevant zoning regulations and would result in a less than significant impact to zoning.

General Plan

Framework Element

The General Plan Framework Element has identified Targeted Growth Areas throughout the City. Within these Targeted Growth Areas, the City has acknowledged that due to a reduction of industrial activity, some industrial land may be converted to non-industrial uses. As identified previously, the Project Site is located within a Targeted Growth Area known as a Regional Center. Therefore, loss of industrially designated land due to the expansion and concentration of commercially designated land such as the Project proposes, would not result in an inconsistency

⁷Assumes a worst case scenario of 1,300 square feet of floor area per condominium, 588,000 square feet of senior housing and assisted living units and 690,000 square feet of office space.

with the Framework Element. Therefore, the proposed Project at the Project Site would result in a less than significant land use impact.

The proposed Zone Change and General Plan Amendment would result in a decrease of 35.5 acres, or 0.1 percent, of industrially designated land on a Citywide basis and a corresponding increase of 35.5 acres, or 0.2 percent, in commercially designated land on a Citywide basis. The scale of changes in land use designations is not considered significant. With adoption of the General Plan Amendment from Light Industrial to Community Commercial, the proposed Zone Change would be considered consistent. Therefore, the proposed Project at the Project Site will result in a less than significant impact due to an inconsistency between the Zoning and Land Use designation.

Impacts to other Citywide Elements of the General Plan are discussed in the respective sections of the Draft MEIR. A potentially significant impact to the existing Public Facilities and Services are of a cumulative nature and cannot be mitigated solely by the Project, but must be addressed in the pending Public Facilities and Service Element. Therefore, the proposed Zone Change and General Plan Amendment will result in a less than significant impact to the General Plan and land use.

Land Use Element

Although the proposed General Plan Amendment will result in a reduction of industrially designated land, lands on three sides of the General Plan Amendment Request area are already zoned, designated, and developed with commercial uses; the General Plan Amendment Request area is separated from other industrially designated lands by Corbin Avenue; and non-industrial uses have previously been permitted within the project vicinity (Homeplace Retirement facility, public storage, skate park, tennis facility). The General Plan Amendment is requested because it will encourage consistency between the existing land use designation and the existing use of the property. Further, with coordination of land use designation and use for commercial purposes, the General Plan Amendment could encourage the conservation of other industrial lands in the Community Plan that are actually utilized for industrial purposes currently. Therefore, the proposed General Plan Amendment and Zone Change will result in a less than significant impact to the Land Use Element due to an incompatibility with land uses in the area.

The proposed Zone Change and General Plan Amendment would result in a decrease of approximately 35.5 acres, or 1.9 percent, of industrially designated land and a corresponding increase of 35.5 acres, or 5.7 percent, of commercially designated land within the Chatsworth - Porter Ranch Community Plan. The scale of change in land use designation is not considered significant. With adoption of the General Plan Amendment from Light Industrial to Community Commercial the proposed Zone Change would be considered consistent. Therefore, the proposed Project at the Project Site will result in a less than significant impact to the Land Use Element due to an inconsistency between Zoning and Land Use designation.

While the proposed General Plan Amendment would conflict with a land use policy identified in the Community Plan, it would not prevent implementation of any land use policies identified. Therefore, the proposed Project at the Project Site will result in a less than significant impact to the Land Use Element.

Community Plans

Community Plan Objectives

Objectives of the Chatsworth - Porter Ranch Community Plan that relate to the proposed Project include:

- To designate lands in quantities and at densities, at appropriate locations, for various private uses; and to designate the need for public facilities and the general locations thereof, as required to accommodate population and activities projected to the year 2010.
- To promote economic well-being and public convenience through:
 - Allocating and distributing commercial lands for retail, service, and other facilities in quantities and patterns based on Los Angeles City Planning Department accepted planning principles and standards.
 - Designating lands for industrial development that can be used without detriment to adjacent uses of other types, and imposing such restrictions on the types and intensities of industrial uses as are necessary to this purpose.

The proposed Project will reallocate approximately 35.5 acres, or 0.1 percent, of land that is currently industrially designated on a Citywide basis to commercial uses, which equates to approximately 0.2 percent of commercially designated land on a Citywide basis. Within the Chatsworth - Porter Ranch Community Plan Area, this reallocation includes a decrease of approximately 1.9 percent in industrially designated land and a corresponding increase of 5.7 percent in commercially designated lands.

Currently, the General Plan Amendment request area, which used to be an internal part of the Northridge Industrial Core, is surrounded on three sides by commercial development. Over time, the surrounding land uses have changed and now include retail to the north, retail to the east, and various commercial and retail uses to the

south. Moreover, the approval of the Homeplace Retirement facility on the Project Site indicates that the City of Los Angeles may not oppose transition of this area from industrial to commercial. Uses currently within the Add Area such as the tennis facility, skate park, and public storage also indicate the change of land use in the immediate project vicinity. Therefore, the proposed change to the General Plan and corresponding Zone Change is consistent with trends in the community and will result in a less than significant impact to land use due to an inconsistency with the Community Plan.

Further, the Project Site is developed with research and development type uses, occupied by Litton Guidance and Control Systems. The current lease on the building and property extends until 2005 at which time the tenant intends to vacate the property and move operations elsewhere. As discussed in the No Project Alternative section, the applicant has made numerous attempts to identify a future user of the property with the same land use.

Due to current market forces within the San Fernando Valley, the applicant has been unable to identify a future industrial tenant for the Project Site and the current industrial designation of the property is not beneficial. The proposed Project would result in redevelopment of the Site with commercial uses which would promote the economic well-being of the community. This would be consistent with objectives of the Community Plan. Therefore, the proposed Project will result in a less than significant impact to land use as a result of inconsistencies with the objectives of the Community Plan.

Community Plan Policies

Policies included within the Chatsworth - Porter Ranch Community Plan that relate to the proposed Project include:

Commerce

The commercial lands (not including associated parking) designated by this Plan to serve suburban residential areas in this Plan are adequate to meet the needs of the projected population to the year 2010, as computed by the following:

- *0.6 acres per 1,000 residents for commercial uses for neighborhood or convenience-type commercial areas;*
- *0.2 acres per 1,000 residents for commercial uses for community shopping and business districts, including service uses and specialized commercial uses. Without effective transportation demand management strategies,*

such as carpool and vanpool or transit, off-street parking should be provided at a ratio of one parking space per 300 gross square feet of building. Surface parking areas shall be located between commercial and residential uses, where appropriate, to provide a buffer, and shall be separated from residential uses by means of a wall and/or landscaped setback.

The Plan indicates the presence of several highway-oriented commercial facilities located throughout Chatsworth. It is a policy of the Plan that existing Highway-Oriented Commercial sites should not be expanded. Marginal or temporary commercial uses in designated industrial areas will be phased out as industrial development takes place.

The proposed Zone Change and General Plan Amendment will result in the creation of additional commercial uses in the Community Plan Area. This will help to meet the plan agenda of the provision of neighborhood commercial uses and community shopping and business districts. The proposed Project at the Project Site does not consist of highway-oriented, marginal, or temporary commercial facilities and will therefore not result in a significant impact to land use as a result of an inconsistency with policies of the Community Plan regarding commerce.

Industry

Industrial lands are located on a citywide basis without regard to the boundaries of individual communities under the general principle that such employment should be available within a reasonable commuting distance from residential locations.

The [Q]M1 Zone classification is permitted on those properties fronting on the following corridors: (1) the north and south sides of Nordhoff Street between De Soto Avenue and Topanga Canyon Boulevard; (2) the east side of Topanga Canyon Boulevard, from Nordhoff Street to the south side of Lassen Street; and (3) the south side of Lassen Street between Topanga Canyon Boulevard and De Soto Avenue. Such conditions of approval shall prohibit smoke stacks, metal plating, toxic and noxious industrial uses, and any new retail commercial uses within these zone classifications.

Industrial acreage shown on the Plan should be protected from intrusion by non-industrial uses, except those corridors described above on Nordhoff Street, Topanga Canyon Boulevard, and Lassen Street should allow uses similar to those permitted in the M1 and M2 Zones. In keeping with the low-density residential character of the Community, to the extent possible, the Plan proposes

preservation of all existing MR zoned lands, and classification of all undeveloped industrial land in the MR1 and MR2 Zones.

The Plan encourages continued development of research and development type industries which do not generate excessive noise, dust, and fumes and are compatible with the residential character of the north and west San Fernando Valley.

The Plan designates approximately 1,821 acres of land for industrial uses. To preserve this valuable land resource from the intrusion of other uses and insure its development with high quality industrial uses, in keeping with the urban residential character of the Community, to the extent possible, the Plan proposes classifying all undeveloped industrial land, as well as all industrial land used for industrial purposes, in restricted industrial zoning categories, such as the MR Zones.

The Project Site is currently zoned MR2-1. While the plan encourages preservation of this zoning, the intent of the preservation is to prohibit intensification of industrial uses beyond the MR zone except where identified by the Plan in the M1 and M2 zones. The proposed Project at the Project Site includes a Zone Change from MR2 to C2 which does not impact the Community Plan policy regarding MR designated lands. Therefore, the proposed Project at the Project Site will not result in a significant impact to land use due to an inconsistency with policies of the Community Plan.

Regional Plans

The Southern California Association of Governments (SCAG) is the areawide clearinghouse for regionally significant projects in the project area. SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these review is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

Policies of SCAG's Regional Comprehensive Plan and Guide (RCPG) and Regional Transportation Plan (RTP) which may be applicable to the proposed Project at the Project Site are shown in **Table 26: SCAG Policies, Section IV, G: Land Use**. The proposed Project at the Project Site would not conflict with policies provided by SCAG and would therefore not result in a significant impact to land use as a result of an inconsistency with applicable regional plans.

Further, as discussed in **Section IV, B: Air Quality**, although the proposed Project at the Project Site may result in a significant impact to air quality, the proposed Project at the Project Site will

not conflict with any of the policies provided by the SCAQMD. Therefore, the proposed Project at the Project Site will not result in a significant impact to land use as a result of an inconsistency with applicable regional plans.

Add Area

Zoning

All of the commercial and residential uses included in the development scenarios are allowable under the C2-1 zoning designation. The C2-1 zoning designation is within Height District 1, which allows for a 1.5 FAR. The Add Area properties cover 673,437 square feet (15.4 acres) of land area, which allows for a floor area of approximately 1,010,156 square feet. The maximum yield of the proposed development scenario at the Add Area is approximately 586,000 square feet of floor area, or an FAR of 0.58:1. The proposed FAR would not exceed the FAR allowed by the proposed zoning. Further, based on the unlimited height district of the proposed zoning, the development scenarios analyzed for the Add Area will not exceed the allowable development height. With the approval of a General Plan Amendment and Zone Change, the development scenarios analyzed will result in a less than significant impact as a result of inconsistencies with the existing and proposed zoning.

The analyzed development scenarios at the Add Area assume that the City will approve a Zone Change from MR2-1 and P-1 to C2-1 and a General Plan Amendment from Light Industrial to Community Commercial concurrent with the proposed Project at the Project Site. Due to the industrial nature of the Add Area, existing land uses in the Add Area including manufacturing and public storage would be considered legal, non-conforming uses. If the requested Zone Change and General Plan Amendment are approved, this land use inconsistency is considered a potentially significant impact before mitigation. However, with incorporation of the proposed mitigation measure, the development scenarios analyzed for the Add Area will result in a less than significant land uses impact due to inconsistencies with the Zoning and General Plan designations.

Land Use Compatibility

Land use compatibility issues are related to potential conflicts of the Project Site and Add Area with existing off-site land uses and potential conflicts of existing off-site uses with future on-site uses.

A land use compatibility analysis for the Add Area concluded that the proposed residential and commercial uses would not conflict with the existing commercial type land uses located to the north and east of the Add Area. The properties zoned and designated for Light Industrial uses to the west and south of the Add Area which are fully contained within their respective buildings and do not generate potentially objectionable noise, odors, or smoke. As a result, these uses are

considered to be compatible with the proposed adjacent commercially designated properties. A significant impact to land use compatibility at the Add Area is not anticipated from off-site uses.

The Homeplace Retirement facility may be fully constructed on the Project Site prior to completion of development resulting from the proposed Project at the Project Site, a residential use will eventually be constructed on the Project Site which may be impacted by industrial uses within the Add Area. The fully-contained nature of the existing office and industrial uses in the Add Area and adjacent to the Homeplace development, the residential uses will not be adversely affected. A significant land use conflict with the proposed residential uses is not anticipated.

The expansion of commercial uses in the area, has not resulted in any known significant incompatibilities with residential uses; therefore, expansion of commercial and residential uses in the Add Area should not create conflicts for the existing off-site uses. As a result, with the approval of the Zone Change and General Plan Amendment for the Add Area would not create a significant impact to land use compatibility.

General Plan

Framework Element

The General Plan Framework Element has identified Targeted Growth Areas within the City of Los Angeles. Within these Targeted Growth Areas, the City has acknowledged that due to the loss of industrial activity, some industrial land may be converted for re-use as non-industrial uses. As identified previously, the Add Area is located within a Targeted Growth Area known as a Regional Center. Therefore, loss of industrially designated land due to the expansion and concentration of commercially designated land such as the Project proposes, would result in a less than significant land use impact due to conflict with the Framework Element.

The proposed Zone Change and Plan Amendment at the Add Area would result in a decrease of approximately 15.4 acres, or 0.1 percent, in industrially designated land. Further, the development scenarios analyzed for the Add Area would increase commercially designated lands by 15.4 acres, or 0.1 percent. However, the scale of change in land use designation resulting from the development scenarios analyzed for the Add Area is not considered significant by itself. With adoption of the General Plan Amendment from Light Industrial to Community Commercial, the proposed Zone Change would be considered consistent. Therefore, the development scenarios analyzed for the Add Area will not result in a significant impact due to an inconsistency between the Zoning and Land Use designation.

Impacts of the development scenarios at the Add Area to Citywide Elements are similar to the Project Site.

Land Use Element

The proposed General Plan Amendment at the Add Area will result in a reduction of industrially designated land. However, lands on three sides of the General Plan Amendment Request Area are already zoned, designated, and developed with commercial uses; the study area is separated from other industrially designated lands by Corbin Avenue; and non industrial uses have previously been permitted within the project vicinity (Homeplace Retirement facility, public storage, skate park, tennis facility). The General Plan Amendment is considered appropriate as it will encourage consistency between land use designation and the existing use of the Add Area properties. The proposed General Plan Amendment and Zone Change will not result in a significant land use impact due to an incompatibility with surrounding land uses in the area.

The proposed Zone Change and Plan Amendment at the Add Area would result in a decrease in industrially designated lands of approximately 15.4 acres, or 0.8 percent and the development scenarios analyzed for the Add Area would increase commercially designated lands by approximately 15.4 acres, or 2.5 percent. The percentage of change in land use designation is not considered significant. Therefore, the development scenarios analyzed for the Add Area will not result in a significant impact to land use due to an inconsistency between Zoning and Land Use designation.

Community Plans

Policies included within the Chatsworth - Porter Ranch Community Plan that relate to the development scenarios analyzed for the Add Area are similar to those of the Project Site. See above text.

Commercial

The proposed Zone Change and General Plan Amendment will result in the creation of additional commercial uses in the Community Plan Area. This will help to meet the plan agenda of the provision of 0.6 acres of neighborhood commercial uses and 0.2 acres of community shopping and business districts. The development scenarios analyzed for the Add Area do not consist of highway-oriented, marginal, or temporary commercial facilities and will therefore not result in a significant impact to land use as a result of an inconsistency with policies of the Community Plan regarding commerce.

Industrial

The Add Area properties are currently zoned MR2-1 and P-1. While the plan encourages preservation of this zoning, the intent of the preservation is to prohibit densification of industrial uses beyond the MR zone except where identified by the Plan in the M1 and M2 zones. The development scenarios analyzed for the Add Area include a Zone Change from MR2 to C2

which does not affect the Community Plan policy regarding MR designated lands. Therefore, the development scenarios analyzed for the Add Area will not result in a significant impact to land use due to an inconsistency with policies of the Community Plan.

Regional Plans

Due to the proximity of the Add Area properties to the Project Site, regional plans applicable to the Add Area are similar to those for the Project Site. Therefore, refer to the Regional Plan discussion for the Project Site.

MITIGATION MEASURES

Project Site

None required.

Add Area

Due to the small size of the parcels in the Add Area, it is possible that future projects proposed in the Add Area could be exempt from environmental review, and may result in inconsistencies between zoning and land use. To mitigate potential impacts of inconsistencies between zoning and land use in the Add Area, the following “Q” conditions shall be placed on any property undergoing a Zone Change and Plan Amendment without an identified specific development plan:

37. When the use of this property formerly designated as “Light Manufacturing” is proposed to be discontinued, the proposed use shall be approved by the appropriate decision-maker through a procedure similar to a conditional use. The decision-maker shall determine that the proposed use is consistent with the objectives of the General Plan and is compatible with the land uses, zoning, or other restrictions of adjacent and surrounding properties. (O, C, R)

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

None of the related projects are known to result in a significant land use impact. However, potential land use impacts from related projects in the area must be determined on a site and project specific basis.

Proposed Project, Add Area, and Related Projects

Potential impacts with respect to the General Plan Framework are determined on a site specific basis. The proposed Project at the Project Site and the development scenarios analyzed for the Add Area will not result in a significant land use impact. Therefore, a significant cumulative land use impact due to conflict with the General Plan is not anticipated.

Impacts due to conflicts with the Community Plan and applicable Regional Plans are determined on a site specific basis. The proposed Project at the Project Site and the development scenarios analyzed for the Add Area will not result in a significant land use impact. Therefore, a significant cumulative impact to land use due to conflict with the Community Plan and applicable Regional Plans is not anticipated.

8. NOISE

CONSTRUCTION PHASE IMPACTS

Construction of the proposed Project will result in temporary increases in ambient noise levels in the project area on an intermittent basis. The increase in noise would likely result in a temporary annoyance to nearby sensitive receptors. However, the incremental increase in noise levels is less than the significance threshold of a five decibel increase over the existing ambient noise level. Therefore, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will result in a less than significant noise impact.

OPERATIONAL PHASE IMPACTS

The predominant operational noise source at the Project Site and Add Area, as with most urbanized areas, is vehicular traffic. However, the incremental increase in the noise level would not be perceptible by the general public and would not exceed the significance threshold determined by the Land Use Compatibility for Community Noise Environment for an increase in noise level. Therefore, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will result in a less than significant impact to noise levels at sensitive receptors.

MITIGATION MEASURES

Environmental impacts to noise may result due to project implementation. However, the potential impacts will be mitigated to a level less than significance by the following measures:

38. The project shall comply with the City of Los Angeles Municipal Code Chapter XI - Noise regulations. (O, C, R)
39. Locate any haul routes as far from the noise sensitive land uses as possible to the extent feasible. (O, C, R)
40. The staging of construction equipment shall be conducted as far from noise sensitive land uses as possible to the extent feasible. (O, C, R)

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

Due to the developed nature of the San Fernando Valley, the predominant noise source in the area is vehicular traffic. Future traffic and noise impacts, including related projects, were studied for the proposed Project at the Project Site and development scenarios analyzed for the Add Area. The noise study completed for the proposed Project at the Project Site and development scenarios analyzed for the Add Area indicates a less than significant noise impact.

Proposed Project, Add Area, and Related Projects

When calculating future traffic impacts, the traffic consultant took eight additional projects into consideration. Thus, future traffic volumes with and without the proposed Project at the Project Site and development scenarios analyzed for the Add Area accounted for the cumulative impacts of related projects. The noise study completed for the proposed Project at the Project Site and development scenarios analyzed for the Add Area indicates a less than significant noise impact. Therefore, a significant cumulative noise impact is not anticipated.

9. POPULATION AND HOUSING

ENVIRONMENTAL IMPACTS

The population of the Chatsworth - Porter Ranch Community Plan Area as a result of the proposed Project at the Project Site and development scenarios analyzed for the Add Area will

not exceed the Los Angeles Citywide General Plan Framework EIR population projection for the Plan Area. Therefore, the proposed development scenarios for the Project Site and Add Area will result in a less than significant impact to population or public services.

The housing unit total within the Chatsworth - Porter Ranch Community Plan Area as a result of the proposed Project at the Project Site and development scenarios analyzed for the Add Area will not exceed the Los Angeles Citywide General Plan Framework EIR housing projection for the Plan Area. Therefore, the proposed development scenarios analyzed for the Project Site and Add Area will result in a less than significant housing impact.

MITIGATION MEASURES

None required.

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

The population of the Chatsworth - Porter Ranch Community Plan Area, as a result of related projects, will not exceed population projections established by the City of Los Angeles Citywide General Plan Framework EIR. Additionally, the increase in housing units within the Chatsworth - Porter Ranch Community Plan Area, as a result of related projects, will not exceed housing projections established by the City of Los Angeles Citywide General Plan Framework EIR. Therefore, related projects will result in a less than significant impact to population or housing.

Project Site, Add Area, and Related Projects

The proposed Project at the Project Site and development scenarios analyzed for the Add Area in combination with applicable related projects will not increase the population or housing units in the area such that they exceed projections established by the Citywide General Plan Framework EIR. Therefore, a significant cumulative impact to population and housing are not anticipated.

10. EMPLOYMENT

ENVIRONMENTAL IMPACTS

The number of employees generated by the proposed Project at the Project Site and development scenarios analyzed for the Add Area will not exceed employment thresholds established by the

SCAG for the year 2010. Therefore, the proposed development scenarios at the Project Site and Add Area will result in a less than significant impact to employment.

MITIGATION MEASURES

None required.

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

Related projects in the project area may generate employees as a result of their development. However, the number of employees generated by related projects is not expected to exceed employments projections established by the SCAG for the Chatsworth - Porter Ranch Community Plan Area. Therefore, related projects in the area will result in a less than significant employment impact.

Project Site, Add Area, and Related Projects

As a result of the proposed Project at the Project Site and development scenarios analyzed for the Add Area in combination with related projects in the area, employment within the Chatsworth - Porter Ranch Community Plan Area could increase. However, the increase would not exceed employment projections established by the SCAG for the year 2010. Therefore, a significant cumulative employment impact is not anticipated.

11. FIRE PROTECTION

ENVIRONMENTAL IMPACTS

A hydraulic analysis was performed on the existing water distribution system, in the vicinity of the proposed development, to simulate additional demands at critical locations in the system.⁸ The existing water distribution system is capable of handling a variable amount of additional flow, as determined by the Los Angeles Water Distribution Engineer.

⁸Letter from Gail Glauz, Engineer of West Valley District Water Distribution Engineering, to Carrie Riordan, Planning Associates, Inc. September 24, 2002.

Based on response distance criteria, fire protection of the Project Site would be considered inadequate. However, with incorporation of mitigation measures, any potential impacts due to response time will be mitigated to a less than significant level.

The LAFD has indicated that intersections operating with a Level of Service (LOS) of E or F could have a significant adverse impact on fire protection services. The proposed Project at the Project Site and development scenarios analyzed for the Add Area will not increase the number of intersections operating at a LOS of E or F. Therefore, the proposed Project will result in a less than significant impact to fire protection services as a result of intersection conditions in the project area. Further, incorporation of mitigation measures will reduce any significant impacts to a less than significant level.

MITIGATION MEASURES

Environmental impacts may result from project implementation due to the location of the Project Site and Add Area in an area having marginal fire protection facilities. However, any potential impacts resulting from the proposed Project would be reduced to a less than significant level by the following measures:

41. Adequate off-site public and on-site private fire hydrants may be required, their number and location to be determined after the LAFD reviews plot plan. (O, C, R)
42. Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the LAFD. (O, C, R)
43. In order to mitigate the inadequacy of fire protection in travel distance, sprinkler systems will be required throughout any structure to be built, in accordance with the Los Angeles Municipal Code, Section 57.09.07. (O, C, R)
44. Construction of public or private roadways in the proposed development shall not exceed 15 percent in grade. (O, C, R)
45. Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549. (O, C, R)
46. Standard cut-corners will be used on all turns. (O, C, R)
47. The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky. (O, C, R)

48. Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required. (O, C, R)
49. No proposed development utilizing cluster, group, or condominium design of one- or two-family dwellings shall be more than 150 feet from the edge of the roadway of an improved street, access road, or designated fire lane. (R)
50. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of LAFD aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. (O, C, R)
51. Where aboveground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley or designated fire lane to the main entrance or exit of individual units. (R)
52. Where access for a given development requires accommodation of LAFD apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway. (O, C, R)
53. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. (O, C, R)
54. Where access for a given development requires accommodation of LAFD apparatus, overhead clearance shall not be less than 14 feet. (O, C, R)
55. Access for LAFD apparatus and personnel to and into all structures shall be required. (O, C, R)
56. The LAFD may require additional vehicular access where buildings exceed 28 feet in height. (O, C, R)
57. Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot. (O, C, R)
- 57a. During demolition, the Fire Department access will remain clear and unobstructed.

- 57b. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- 57c. No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.
- 57d. Private street shall be recorded as Private Streets, AND Fire Lane. All private street plans shall show the words "Private Street and Fire Lane" within the private street easement.
- 57e. No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.
- 57f. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.
- 57g. Submit plot plans for Fire Department approval of access and fire hydrants.

LEVEL OF IMPACT AFTER MITIGATION

Based on the first due engine company distance and response time, the proposed Project at the Project Site and development scenarios analyzed for the Add Area would be considered to be inadequately served. However, implementation of the proposed mitigation measures would result in the maximum feasible fire protection and access for emergency vehicles. Any potential fire protection service impacts would be reduced to a less than significant level.

CUMULATIVE IMPACTS

Related Projects

Related projects in the immediate area may result in the need for increased staff at existing fire facilities, additional fire protection facilities, or relocation of present fire protection facilities which may produce some area-wide impacts. As with the proposed Project however, related projects would be subject to individual review and approval by the LAFD.

Proposed Project, Add Area, and Related Projects

As discussed above, development of the proposed Project at the Project Site and the development scenarios analyzed for the Add Area will result in a less than significant impact to fire protection services. Related project development in the area may result in the need for increased staff at

existing fire protection facilities, additional fire protection facilities, or relocation of present fire facilities, which may produce some area-wide cumulative impacts. However, as with the proposed Project and development scenarios analyzed, related projects would be subject to individual review and approval by the LAFD. Therefore, a significant cumulative impact to fire protection services is not anticipated.

12. POLICE PROTECTION

ENVIRONMENTAL IMPACTS

The proposed Project has the potential to increase population in the area by approximately 1,797 residents and approximately 5,089 employees. Based on LAPD staffing requirements, this increase could require the need for approximately seven additional officers. Due to existing understaffed conditions in the Devonshire Area, a potential increase in required officers may result in a significant impact on police services in the project area due to increased staffing needs and delayed response times.

The LAPD has indicated that intersections operating at a LOS of E or F could have a significant adverse impact on police protection services. The proposed Project will not increase the number of intersections operating at a LOS of E or F and will not decrease the LOS at intersections already operating at these conditions. Therefore, the proposed Project will result in a less than significant impact on police services due to intersection conditions.

Incorporation of the proposed mitigation measures will reduce any potential impacts to the greatest extent possible. However, the proposed Project may result in a significant impact to police protection services.

MITIGATION MEASURES

Potential impacts identified at the Project Site and Add Area are a result of existing understaffed conditions within the Devonshire Division of the LAPD. The applicant does not have control over staffing within the LAPD and therefore can attempt to mitigate existing and potential impacts only through physical design measures. Therefore, potential impacts at the Project Site and Add Area will be mitigated to the greatest extent possible by the following measures:

58. A comprehensive security plan that includes uniformed security and video monitoring; (O, C, R)
59. A graffiti removal plan; (O, C, R)
60. The establishment of a Business Coalition/Neighborhood Watch program; (O, C, R)

61. A comprehensive traffic control plan; and (O, C)
62. Incorporate into plans the design guidelines relative to security in semi-public and private spaces, which may include, but not be limited to, access control of building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. (O, C, R)
 - 62a. During the development stage of the project, Devonshire Area of the Los Angeles Police Department (LAPD) will provide extra patrol for the location when possible.
 - 62b. The on-site project manager will maintain regular liaison with the Devonshire Area Senior Lead Officer for the location during development.
 - 62c. Upon completion and staffing, the on-site management will establish a liaison with the Senior Lead Officer.
 - 62d. The on-site management and residents of the development will establish an Apartment/Condo Watch group for crime prevention.
 - 62e. Quarterly Apartment Watch meetings will be conducted by the Senior Lead Officer at the site initially addressing emergency services available, communications with the LAPD, organizations and functions of the LAPD, senior crimes and identity theft.

LEVEL OF IMPACT AFTER MITIGATION

With the incorporation of the proposed mitigation measures, significant impacts anticipated from the proposed Project and related projects will be reduced to the greatest extent possible. However, the LAPD does not have plans to increase staffing within the Devonshire Division that would mitigate the existing understaffed conditions. Therefore, the proposed Project will result in a significant impact to police protection services after the incorporation of mitigation measures.

CUMULATIVE IMPACTS

Related Projects

Related projects in the area have the potential to increase the permanent population by approximately 11,258 residents. Further, approximately 9,442 employees could be introduced to the area as a result of related projects. Based on the LAPD staffing requirements, related projects could result in a significant impact on police services due to increased staffing needs. Due to existing understaffed conditions within the LAPD, the potential for an increased need for officers could result in a significant impact on police protection services due to staffing needs and subsequent delayed response times.

Ambient traffic increases, as well as potential traffic impacts resulting from the related projects, could result in a LOS of E or F during peak hours at intersections throughout the San Fernando Valley. However, related projects will not increase the number of intersections operating at a LOS of E or F and will not decrease the LOS at intersections already operating at these conditions. Therefore, related projects will result in less than significant impact on police services due to intersection conditions.

Proposed Project, Add Area, and Related Projects

Development of the proposed Project at the Project Site and development scenarios analyzed for the Add Area, in combination with any related project, could result in a significant impact on police services in the western San Fernando Valley. This development could result in an increase in the permanent population of approximately 13,055 people. Additionally, development could introduce approximately 9,442 employees into the area. Due to police staffing requirements of one officer per 758 residents and existing understaffed conditions, an increase in residents and employees could result in a significant cumulative police impact due to staffing conditions.

However, the number of intersections operating at an LOS of E or F will not increase and the LOS at intersections already operating at these conditions will not decrease. Therefore, a significant cumulative impact on police protection services is not anticipated due to intersection conditions.

13. LIBRARIES

ENVIRONMENTAL IMPACTS

The proposed Project could generate a maximum of 1,797 new residents to 86,531 residents. However, based on the current service capacity of the Porter Ranch Library (approximately 100,000 residents), the demand for library services would not exceed the level of service available at the library branch currently serving the project area. Additionally, the Northridge

Branch and the Chatsworth Branch Libraries are anticipated to open in late 2003 which will increase the capacity of library services in the project area. Therefore, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will result in a less than significant impact to Los Angeles Public Library services in the area.

MITIGATION MEASURES

None required.

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

Only two of the related projects have residential elements that have the potential to affect library services by altering the permanent population in the area. Related Project 5 has the potential to generate approximately 9,443 new residents in the area. Related Project 6 has the potential to generate approximately 1,815 new residents. Based on these two related projects, the resident population in the project area could increase by approximately 11,258 resident to approximately 95,992 residents. This population would be accommodated by existing library services and any additional services that will open in the near future such as the Chatsworth and Northridge Library Branches.

Project Site, Add Area, and Related Projects

The proposed Project at the Project Site, development scenarios analyzed for the Add Area, and related projects will increase the population by approximately 13,055 new residents to 97,789 residents. Based on the current capacity of library services, demand for library services will not exceed the level of service currently available at the library branch serving the area. Therefore, a significant cumulative impact on Los Angeles Public Library services is not expected.

14. SCHOOLS

ENVIRONMENTAL IMPACTS

Schools serving the project area include Calahan Elementary School, Nobel Middle School, and Cleveland High School. School service needs are related to the size of the residential population, the geographic area served, and community characteristics.

Condominium units associated with the proposed Project at the Project Site and development scenarios analyzed for the Add Area would have the potential to generate a maximum of twenty eight new students: twelve elementary school students, eight middle school students, and eight high school students.

Both Calahan and Nobel schools are anticipated to have the necessary capacity to accommodate the maximum number of potential students generated by the proposed Project. Cleveland High School is projected to have a population that exceeds its operating capacity. However, as within other LAUSD schools, Cleveland High School could begin to operate on a four-track, year-round school calendar, as opposed to the current one-track, traditional calendar. The four-track, year-round calendar allows for an increase of approximately twenty five percent in the enrollment at a particular school annually. Implementation of a four-track, year round calendar at Cleveland High School could increase enrollment from 3,831 students to 4,789 students, which would accommodate the projected enrollment of the proposed development scenarios at the Project Site and Add Area. With implementation of the proposed mitigation measure, the proposed development scenarios at the Project Site and Add Area will result in a less than significant impact to school services in the area.

MITIGATION MEASURES

Although a significant impact to school facilities in the project area has not been identified, environmental impacts may result on school facilities as a result from Project implementation. However, incorporation of the following mitigation measures will help further reduce any potential impacts on schools in the area.

63. The developer will pay school fees required by the City of Los Angeles. (O, C, R)

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

Of the eleven related development projects in the area, only two include a residential component that might have a significant impact on schools: Porter Ranch (Related Project 4) and Deer Lake Ranch (Related Project 5). However, due to the location of both of these communities north of the 118 Freeway (SR-118), neither community is located in the same school attendance area as the project area. Further, each related project will pay the required school fees. Therefore, neither Porter Ranch nor Deer Lake Ranch will result in a significant impact to schools.

Project Site, Add Area, and Related Projects

The potential cumulative increase in students as a result of Project implementation at the Project Site and the Add Area is approximately 28 students. Although two related projects have residential elements that could potentially affect school services in the area, as discussed above, neither of the two projects are within the same school attendance area as the project area. Therefore, the related projects identified with the potential to impact school facilities are not included in the cumulative impact analysis.

Based on the current and projected attendance and enrollment rates at each of the attendance area schools (Calahan Elementary School, Nobel Middle School, Cleveland High School) it is anticipated that the potential increase of 28 students could be accommodated. Therefore, a significant cumulative impact on school facilities or services in the project area is not anticipated.

15. PARKS AND RECREATION

ENVIRONMENTAL IMPACTS

Currently, there is no open space or parkland on the Project Site or Add Area. The proposed Project at the Project Site and development scenarios analyzed for the Add Area do not include the construction or removal of open space or parkland.

Currently, the Chatsworth - Porter Ranch Community Plan Area provides approximately 755 acres of parkland to its 84,734 residents,⁹ a ratio of 32.5 acres of parkland per 1,000 residents. As a result of the proposed Project at the Project Site and development scenarios analyzed for the Add Area, the ratio of residents to acres of parkland will decrease to 31.8 acres of parkland per 1,000 residents. However, this ratio of 31.8 acres of parkland per 1,000 residents is still greater than both the City of Los Angeles requirement of 4 acres of parkland per 1,000 residents and the City of Los Angeles provision of 4.25 acres per 1,000 residents. Further, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will pay an in-lieu fee in accordance with the City's Ordinance (No. 141,422) and as set forth in the Zoning Code (Section 17.12). Therefore, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will result in a less than significant impact on parkland and open space.

There are no existing active recreational facilities located on the Project Site. A tennis facility and skate park are currently located within the Add Area properties. Based on the number of recreational facilities available in the project area, the increase in population and potential removal of the skate park and tennis facility within the Add Area, will not result in an increased demand on recreational facilities that cannot be absorbed by existing facilities in the area.

⁹City of LADCP, Demographics Research Unit Statistical Information. August 13, 2002.
<http://www.lacity.org/PLN/DRU/C2K/Cwd/PgCwd.cfm?grfxname=CPHist>

MITIGATION MEASURES

Although a significant impact to parkland, open space, and active recreational facilities in the project area has not been identified, environmental impacts may result from project implementation at the Project Site and Add Area. However, incorporation of the following mitigation measures will help further reduce any potential impacts on parkland and recreational facilities in the area.

64. Per Section 17.12-A of the City of Los Angeles Municipal Code, the applicant shall pay the applicable Quimby fees for the construction of condominiums, or Recreation and Park fees for the construction of apartment buildings. (R)

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

Related projects that could potentially impact existing parkland are those that would increase demand on parkland by either increasing the local population or removing existing facilities. Related Projects 4 and 5, while not disturbing any existing parkland, will increase the resident population of the area by approximately 11,258 residents. Therefore, the ratio of parkland to residents will decrease to 28.7 acres of parkland per 1,000 residents. However, this ratio of 28.7 acres of parkland per 1,000 residents is greater than both the City of Los Angeles standard of 4.0 acres of parkland per 1,000 residents and the City of Los Angeles Citywide average of 4.25 acres per 1,000 residents. Therefore, related projects will not result in a significant impact on parkland.

The increase in population could result in a significant impact to active recreational facilities. However, recreational impacts of related projects must be determined on a project-specific basis. Further, each project will pay an in-lieu fee in accordance with the City's Ordinance (No. 141,422) and as set forth in the City's Zoning Code (Section 17.12). These fees are based on the number of units and proposed zoning for each site. Credits may also be given for recreational facilities provided as part of a project. As a result of incorporation of in-lieu fees, any significant impacts due to related projects will be reduced to a less than significant level. Therefore, related projects will not result in a significant impact to active recreational facilities in the area.

Proposed Project, Add Area, and Related Projects

With the proposed Project at the Project Site and development scenarios analyzed for the Add Area, in combination with the identified related projects, the resident population in the Chatsworth - Porter Ranch Community Plan Area will be increased by approximately 13,055 residents to 97,789. As a result, the ratio of parkland to residents will decrease to approximately 28.2 acres of parkland per 1,000 residents. This ratio is well above the City of Los Angeles standard of 4.0 acres of parkland per 1,000 residents and the current Citywide average of 4.25 acres of parkland per 1,000 residents. Therefore, a cumulative impact to parkland is not anticipated.

The increase in population could result in a significant impact to active recreational facilities. Each project will pay an in-lieu fee in accordance with the City's Ordinance (No. 141,422) and as set forth in the City's Zoning Code (Section 17.12). These fees are based on the number of units and zoning for each site. Credits may also be given for recreational facilities provided as part of a project. As a result of incorporation of the identified mitigation measure, any significant impacts due to the proposed or related projects will be reduced to a less than significant level. Therefore, a cumulative impact to active recreational facilities is not anticipated.

16. TRAFFIC

A Traffic Study for the proposed Project was prepared by Linscott, Law & Greenspan Engineers (LLG), dated May 21, 2003. LADOT has reviewed this traffic study and has determined, in a letter dated August 27, 2003, that the analysis adequately describes all transportation impacts associated with the proposed Project and provides adequate measures to mitigate all potential significant impacts.

ENVIRONMENTAL IMPACTS

Project Site Traffic 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 Institute of Transportation Engineers' (ITE) *Trip Generation* manual, 6th Edition, 1997.

Specific vehicular access points to and from the Project Site have not been determined at this time. For purposes of analysis, it is assumed that vehicular access to the Project Site will be provided via Prairie Street, Corbin Avenue, Nordhoff Street, and Shirley Avenue. It is anticipated that full access (both ingress and egress) turning movements will be accommodated at the Project driveways.

The proposed Project is expected to generate a maximum of 13,136 net new daily trip ends during a typical weekday 24-hour period (6,568 inbound and 6,568 outbound trips). During the AM peak hour, the proposed Project is expected to generate a maximum of 1,091 net new vehicle trips (981 inbound and 110 outbound). During the PM peak hour, the proposed Project is expected to generate a maximum of 1,249 net new vehicle trips (222 inbound and 1,027 outbound).

Thirty nine study intersections were evaluated using the Critical Movement Analysis (CMA) method of analysis which determines Volume-to-Capacity (v/c) ratio on a critical lane basis. The overall intersection v/c ratio is subsequently assigned a Level of Service (LOS) value to describe intersection operations. The Levels of Service vary from LOS A (free flow) to LOS F (jammed condition).

Traffic volumes for each new condition were added to volumes in the prior condition to determine the change in capacity utilization at the study intersections. An annual two percent (2.0%) ambient growth rate was assumed so as to account for unknown related projects in the vicinity of the proposed Project.

Future pre-project conditions are assumed to include roadway improvements associated with the Porter Ranch project. Mitigation associated with the Porter Ranch related project located at the Corbin Avenue and Rinaldi Street intersection includes re-striping the northbound and southbound approaches to provide two left-turn lanes, one through lane, and one shared through/right-turn lane. The Porter Ranch project mitigation at the Corbin Avenue and Devonshire Street intersection includes re-striping the southbound approach to provide one left-turn lane, two through lanes, and one shared through/right-turn lane. The Porter Ranch project mitigation at the Tampa Avenue and Chatsworth Street intersection includes re-striping the northbound Tampa Avenue approach to provide one left-turn lane, three through lanes, and one shared through/right-turn lane.

Future With Related Projects

The Levels of Service at all of the study intersections are incrementally increased by the addition of traffic generated by related projects.

A maximum of fourteen of the study intersections are expected to operate at LOS D or better during the AM and/or PM peak hours with the addition of growth in ambient traffic and traffic due to related projects. Twenty five study intersections are anticipated to operate at LOS E or F with the addition of growth in ambient traffic and related projects traffic during peak hours.

Future With Project Development

According to the LADOT impact criteria, Project Site Only development would result in a significant impact to a maximum of nineteen study intersections. The Full Build Out Project would result in a significant impact to a maximum of twenty four study intersections. Incremental but not significant impacts are noted at the remaining study intersections due to development of the Project Site Only.

Congestion Management Plan Traffic Impact Assessment

The Congestion Management Program (CMP) is a state-mandated program enacted by the passing of Proposition 111 in 1990. The program is intended to address the impact of local growth on the regional transportation system. As required by the 2002 Congestion Management Program for Los Angeles County, a Traffic Impact Assessment (TIA) was prepared to determine potential impacts on designated monitoring locations on the CMP highway system.¹⁰

The CMP TIA guidelines require that intersection monitoring locations must be examined if the proposed Project will add 50 or more trips during either the AM or PM weekday peak periods. The proposed Project will not add 50 or more trips during the AM or PM peak hours at the CMP monitoring intersections and therefore, no further review of potential impacts to intersection monitoring locations which are part of the CMP highway system is required.

Further, the CMP TIA guidelines require that freeway monitoring locations must be examined if the proposed Project will add 150 or more trips (in either direction) during either the AM or PM weekday peak hours. The proposed Project will not add 150 or more trips (in either direction) during either the AM or PM weekday peak hours at CMP mainline freeway monitoring locations and therefore, no further review of potential impacts to freeway monitoring locations which are part of the CMP highway system is required.

MITIGATION MEASURES

The proposed Project will result in significant transportation impacts at twenty four of the thirty nine study intersections. However, due to differing levels of development between potential development scenarios, differing traffic distribution between potential development scenarios, and the level of development at the time of implementation of a specific mitigation measure, the need for a specific improvement may differ. However, the general improvement identified at each intersection will not be different. The following mitigation measures apply to Residential (R), Office (O), and Retail (C).

¹⁰The analysis has been prepared in accordance with procedures outlined in the 2002 *Congestion Management Program for Los Angeles County*, County of Los Angeles Metropolitan Transportation Authority, June, 2002.

65. *Mason Avenue Extension Project*

The mitigation consists of providing a fair-share funding to LADOT for the design and construction of the Mason Avenue Extension project. Mason Avenue is a non-contiguous north-south secondary highway in the project vicinity located between De Soto Avenue and Winnetka Avenue. Currently, Mason Avenue extends south from Nordhoff Street to Victory Boulevard and north from Plummer Street to the Porter Ranch Project area north of the SR-118 Freeway. However, Mason Avenue does not provide access across the Union Pacific railroad tracks located between Prairie Street and Nordhoff Street. Due to the discontinuous nature of Mason Avenue, regional through traffic that would otherwise travel on Mason Avenue must instead use alternate parallel north-south highways such as De Soto Avenue, Winnetka Avenue, Corbin Avenue and Tampa Avenue. Based on discussions with senior management at LADOT, it has been determined that this project's contribution to the Mason Avenue Extension Project shall not exceed \$500,000,000. Payment of the project's fair share contribution shall be either in cash or by the posting of a letter of credit and shall be due prior to the issuance of the first building permit for new development at the Project Site.

The Mason Avenue Extension project includes the design and construction of an at-grade crossing of Mason Avenue at the existing railroad tracks. When the Mason Avenue Extension project is complete, it is anticipated that traffic from other major north-south roadways such as De Soto Avenue, Winnetka Avenue, Corbin Avenue, and Tampa Avenue will shift to Mason Avenue such that the regional through traffic will become better balanced among these thoroughfares. Therefore, mitigation associated with the Mason Avenue Extension Project includes a redistribution of traffic from parallel north-south roadways to Mason Avenue.

The City of Los Angeles prepared a Mitigated Negative Declaration (MND) and Initial Study, including a transportation component, for the Mason Avenue Extension project. The MND prepared for the extension project concluded that there would be no significant transportation impacts due to the Mason Avenue Extension project or due to the regional shift of traffic associated with it.

Secondary Impacts on Mason Avenue

Pursuant to the direction of LADOT, a review of intersections along Mason Avenue with implementation of the Mason Avenue Extension project was required. This analysis was intended to identify secondary, project-related impacts, to intersections along Mason Avenue. Primary impacts are considered those resulting from the regional redistribution of traffic after the completion of the Mason Avenue Extension construction [determined to be less than significant by the MND prepared by the Bureau of Engineering and approved by the City Council on December 18, 2001 (CF 01-2602)]. Secondary impacts are considered those specific to the Project Site Only project, assuming prior completion of the Mason Avenue Extension project. In order to determine the secondary impacts on Mason Avenue associated with the Project Site Only

project, the following intersection operations in the With Project conditions were compared to intersection operations in the Without Project condition, including the regional traffic volume shifts associated with completion of the Mason Avenue Extension project:

- Mason Avenue and Devonshire Street
- Mason Avenue and Lassen Street
- Mason Avenue and Plummer Street
- Mason Avenue and Nordhoff Street
- Mason Avenue and Parthenia Street

Application of the City’s thresholds of significance to the With Project condition indicates that development of the Project Site Only project and the Full Build Out project do not result in significant secondary impacts to study intersections along Mason Avenue. Therefore, no additional improvement measures along Mason Avenue are required or recommended.

66. Physical Improvement Measures

Several physical improvement measures are available to mitigate transportation impacts due to the construction and occupancy of a proposed Project. Implementation of physical improvements will depend on the amount of square footage constructed in each phase of development. It is envisioned that prior to the issuance of a building permit for a specific phase of development, the “triggered” improvements must be guaranteed. Moreover, prior to occupancy of each phase of development, “triggered” improvements must be completed. The thresholds at which physical improvements become necessary for both the Project Site alone and full build out development scenarios are shown in **Table 1: Traffic Mitigation Requirements**. Following, are brief descriptions of each of the physical improvement measures proposed and the intersections that would be affected.

Corbin Ave between Nordhoff St/Pl and Plummer Street

Recommended mitigation for Corbin Avenue between Nordhoff Street/Nordhoff Place and Plummer Street includes of the following:

- Dedicate up to two feet on Corbin Avenue along the Krausz Property frontage (i.e., from Prairie Street to Nordhoff Street) to provide a minimum 45-foot half right-of-way in compliance with the City’s standard for Secondary Highways.
- Widen the east curb of Corbin Avenue between Nordhoff Street/Nordhoff Place and Prairie Street by three feet along the Krausz Property frontage. The three foot widening will yield a 40-foot half roadway on the flare section of Corbin Avenue north of Nordhoff Street, and a 35-foot half roadway northerly thereof, in compliance with the City’s standard for Secondary Highways.

TABLE 1
TRAFFIC MITIGATION REQUIREMENTS

Mitigation Measure	Project Site Only Scenarios				Full Build Out Scenarios			
	1	2	3	4	1	2	3	4
Mason Ave Extension	x	x	x	x	x	x	x	x
Physical Improvements Corbin Ave from Nordhoff St/Pl to Plummer St	x 150,000 sf Retail (821 trips)	x 720,000 sf Office (887 trips)	x 105,000 sf Retail (648 trips)	x 610,000 sf Office (763 trips)	x 195,000 sf Retail (975 trips)	x 940,000 sf Office (1,133 trips)	x 130,000 sf Retail (746 trips)	x 805,000 sf Office (982 trips)
Transportation Demand Management		x		x		x		x
ATSAC/ATCS Shirley Ave/Plummer St		x 775,000 sf Office (948 trips)			x 510,000 sf Retail (1,840 trips)	x 1,140,000 sf Office (1,358 trips)		x 1,025,000 sf Office (1,229 trips)
Reseda Blvd/Plummer St	x 295,000 sf Retail (1,282 trips)		x 235,000 sf Retail (1,104 trips)		x 400,000 sf Retail (1,567 trips)	x 1,260,000 sf Office (1,492 trips)	x 320,000 sf Retail (1,353 trips)	
Tampa Ave/Plummer Street						x 1,165,000 sf Office (1,385 trips)		x 1,050,000 sf Office (1,257 trips)
Tampa Ave/Nordhoff St		x 715,000 sf Office (881 trips)		x 660,000 sf Office (819 trips)		x 930,000 sf Office (1,122 trips)		x 855,000 sf Office (1,037 trips)

XXX,000 sf = Level of office or retail development that triggers physical improvement for traffic mitigation. The development "trigger" includes build out of the Homeplace Retirement Community, as well as the condominium components of Scenarios 3 & 4.

- Modify striping on the northbound Corbin Avenue approach to the Nordhoff Street/Nordhoff Place intersection to provide one left-turn lane, two through lanes, and one optional through/right-turn lane.
- Modify striping on Corbin Avenue between Nordhoff Street/Nordhoff Place and Plummer Street to provide three northbound through lanes and two southbound through lanes, plus a center lane designated for left-turns. At the Plummer Street intersection, the northbound Corbin Avenue curb lane will be designated as a right-turn lane (thereby providing one left-turn lane, two through lanes, and one right-turn lane on the northbound Corbin Avenue approach to the Plummer Street intersection). It should be noted that the third northbound through lane on Corbin Avenue between Prairie Street and Plummer Street can be accommodated within the existing curb-to-curb roadway width.

67. Transportation Demand Management Measures

The project shall comply with Ordinance No. 168,700 which requires the implementation of a Transportation Demand Management (TDM) plan at new development in excess of 25,000 square feet. The TDM plan will provide actions to encourage use of alternatives to single-

occupant vehicles such as public transit, cycling, walking, carpooling/vanpooling, and changes in work schedule to move trips out of the peak travel periods (or eliminate them altogether). The TDM plan will apply to the office component of the project scenarios. The TDM plan will apply to employees only and would not apply to residents or patrons/visitors to the project. It is conservatively estimated that a TDM plan will reduce project-related office trips by 15% as compared to unmanaged development at the Project Site and Add Area.

Prior to the issuance of any building, grading, or foundation permit for an office project within the site, the applicant shall submit a preliminary TDM plan to LADOT for review. LADOT shall review and approve the preliminary TDM plan. Prior to the issuance of any temporary or permanent certificate of occupancy for an office-related project, a final TDM plan shall be submitted for review and approval by LADOT. An annual status report regarding the TDM program shall be submitted by the building owner to LADOT beginning one year after the issuance of the project's first certificate of occupancy. The building owner can discontinue the preparation and submittal of the annual status reports after submitting five consecutive reports demonstrating compliance with the TDM program. The TDM plan shall include documentation that the 15% trip reduction credit, proposed as a mitigation measure for the office component, is fully realized and maintained for five consecutive years. No building permit, change of use permit, conditional use permit or certificate of occupancy shall be issued for any development that has not complied with the requirements of the TDM mitigation. Non-compliance with the TDM plan may include any of the following, pursuant to a written determination letter by the LADOT General Manager: failure to submit a TDM plan in conformance with the requirements; failure to implement an approved TDM plan; or failure to address modifications recommended to a preliminary TDM plan after consultation. When written notification of failure to meet the TDM's plan is received from LADOT, the building owner shall submit a revised TDM plan to LADOT for review and approval. The revised TDM plan shall incorporate measures necessary for the property owner to comply with goals by the next TDM annual status report period or a date agreed upon by the property owner and LADOT.

68. *ATSAC/ATCS Measures*

ATSAC/ATCS improvement measures are available to mitigate significant transportation impacts expected at intersections from the construction and occupancy of the proposed Project. ATSAC/ATCS mitigation consists of funding the installation of LADOT's Automated Traffic Surveillance and Control System (ATSAC)/Adaptive Traffic Control System (ATCS) at the impacted intersection. Implementation of the traffic signal improvements will depend on the amount of square footage constructed in each phase of development. It is envisioned that prior to the issuance of a building permit for a specific phase of development, the "triggered" improvements must be guaranteed and, moreover, prior to occupancy of each phase of development, the improvements must be completed. LADOT estimates that the ATSAC system reduces the critical v/c ratios by seven percent (0.07) at intersections where such equipment is installed and the ATCS system upgrade further reduces the v/c ratio by three percent (0.03).

ATSAC/ATCS is proposed to mitigate significant traffic impacts at the following intersections:

- Shirley Avenue and Plummer Street
- Reseda Boulevard and Plummer Street
- Tampa Avenue and Plummer Street
- Tampa Avenue and Nordhoff Street

LEVEL OF IMPACT AFTER MITIGATION

Effectiveness of the recommended mitigation measures was assessed through completion of the intersection capacity analysis which assume implementation of the above mitigation measures. Implementation of the recommended traffic mitigation measures is expected to reduce Project traffic impacts to less than significant levels at all the affected study intersections.

17. ELECTRICITY

ENVIRONMENTAL IMPACTS

Electricity demand as a result of the proposed Project at the Project Site and development scenarios analyzed for the Add Area will increase by approximately 15,624,409 Kwh annually. According to the LADWP, the proposed demand will not adversely impact the existing electricity distribution system.¹¹ The proposed Project at the Project Site and development scenarios analyzed for the Add Area will not result in the need for new or major modifications to generation or distribution systems and does not propose to use electricity wastefully or in excessive amounts. Therefore, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will result in a less than significant impact to the electrical utility in the project area.

MITIGATION MEASURES

Although a significant impact to electricity was not identified at the Project Site or Add Area, the following mitigation measures will help further reduce any potential impacts on electricity provision in the area and may encourage electricity conservation.

69. Prior to the issuance of a building permit, the applicant shall consult with the DWP regarding such energy saving programs as *Green Power for a Green L.A. Program, Trees for a Green LA, Efficiency Solutions, Solar Energy, Electric Transportation, Commercial Energy Efficiency Measures.* (O, C, R)

¹¹Letter from Charles Holloway, Supervisor of the Environmental Assessment Division of the LADWP to Carrie Riordan of Planning Associates, Inc. June 11, 2002.

70. The applicant shall incorporate measures to meet or, if possible, exceed minimum efficiency standards for Title XXIV of the California Code of Regulations. In addition to energy efficiency technical assistance, the Department may offer financial incentives for energy designs that exceed requirements of Title XXIV for energy efficiency.
 - Built-in appliances, refrigerators, and space-conditioning equipment should exceed the minimum efficiency levels mandated in the California Code of Regulations. (O, C, R)
 - Install high-efficiency air conditioning controlled by a computerized energy-management system in the office and retail spaces which provides the following: (O, C)
 - A variable air-volume systems which results in minimum energy consumption and avoids hot water energy consumption for terminal reheat;
 - A 100-percent outdoor air-economizer cycle to obtain free cooling in appropriate climate zones during dry climatic periods;
 - Sequentially staged operation of air conditioning equipment in accordance with building demands; and
 - The isolation of air conditioning to any selected floor or floors.
 - Consider the applicability of the used of thermal energy storage to handle cooling loads. (O, C)
71. Cascade ventilation air from high-priority areas before being exhausted, thereby decreasing the volume of ventilation air required. For example, air could be cascaded from occupied space to corridors and then to mechanical spaces before being exhausted. (O, C)
72. Recycle lighting system heat for space heating during cool weather. Exhaust lighting system heat from the buildings, via ceiling plenums, to reduce cooling loads in warm weather. (O, C)
73. Install low and medium static-pressure terminal units and ductwork to reduce energy consumption by air distribution systems. (O, C)
74. Ensure that buildings are well sealed to prevent outside air from infiltrating and increasing interior space conditioning loads. Where applicable, design building entrances with vestibules to restrict infiltration of unconditioned air and exhausting conditioned air. (O, C, R)

75. A performance check of the installed space conditioning system should be completed by the developer/installer prior to issuance of the certificate of occupancy to ensure that energy efficiency measures incorporated into the project operate as designed. (O, C, R)
76. Finish exterior walls with light-colored materials and high-emissivity characteristics to reduce cooling loads. Finish interior walls with light-colored materials to reflect more light and, thus, increase lighting efficiency. (O, C)
77. Install thermal insulation in walls and ceilings which exceeds requirements established by the California Code of Regulations. (O, C, R)
78. Design window systems to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather. (O, C, R)
79. Install heat-rejecting window treatments, such as films, blinds, draperies, or other on appropriate exposures. (O, C, R)
80. Install fluorescent and high-intensity-discharge (HID) lamps, which give the highest light output per Watt of electricity consumed, wherever possible, including all street and parking lot lighting, to reduce electricity consumption. Use reflectors to direct maximum levels of light to work surfaces. (O, C)
81. Install photosensitive controls and dimmable electronic ballasts to maximize the use of natural daylight available and reduce artificial lighting load. (O, C)
82. Install occupant-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption. (O, C)
83. Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security. (O, C, R)
84. Control mechanical systems (HVAC and lighting) in the building with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space. (O, C)

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

Related projects in the area will increase electricity consumption by approximately 71,863,953 kWh annually. However, the Los Angeles DWP, has indicated that the DWP will be able to accommodate the increased demand. Therefore, related projects in the project area will result in a less than significant impact on electricity provision in the project area.

Proposed Project, Add Area, and Related Projects

As a result of proposed development at the Project Site and Add Area, and related projects, consumption of electricity is expected to increase by a maximum of approximately 87,488,362 kWh annually. The Los Angeles DWP has indicated that there is adequate supply of electricity to meet this increased demand. Therefore, a significant cumulative impact to electricity provision services is not anticipated.

18. NATURAL GAS

ENVIRONMENTAL IMPACTS

The proposed Project at the Project Site and development scenarios analyzed for the Add Area would increase natural gas demand by approximately 4,162,758 cubic feet monthly. The Southern California Gas Company has indicated that they have adequate supply for estimated demand in the foreseeable future and future service problems are not anticipated.¹² Given the land use intensities proposed for the Project Site and Add Area, The Gas Company would not require a major modification to the local distribution system. Therefore, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will result in a less than significant impact to natural gas provision.

MITIGATION MEASURES

None required.

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

¹²Letter from Jim Hammel, Technical Services, The Gas Company to Carrie Riordan of Planning Associates, Inc. May 9, 2002.

CUMULATIVE IMPACTS

Related Projects

Related projects in the area would consume approximately 31,815,066 cubic feet of natural gas monthly. Demand projections by The Gas Company have accounted for the cumulative impacts of related projects and ambient growth in the project area. The Southern California Gas Company has adequate supply for estimated demand in the foreseeable future and future service problems are not anticipated.¹³

The existing facilities are adequate to serve nearby related projects. Given the land use intensities proposed for related projects, The Gas Company would not require a major modification to the local distribution system. Therefore, related projects in the project area will result in a less than significant impact to the natural gas utility and natural gas provision in the project area.

Project Site, Add Area, and Related Projects

Implementation of the proposed Project at the Project Site and development scenarios analyzed for the Add Area and related projects in the area, will increase natural gas demand by a maximum of approximately 35,977,824 cubic feet monthly. While this will increase the consumption of a non-renewable resource, the Southern California Gas Company has indicated that there is adequate supply for the increased demand. Therefore, a significant cumulative impact on natural gas services in the area is not anticipated.

19. WATER

ENVIRONMENTAL IMPACTS

Domestic water service for the proposed Project is anticipated to be provided by the LADWP, the agency that currently provides water service to the area. The proposed Project will increase water demand in the project area by approximately 303,119 gallons per day (339 acre-feet annually).

According to the Los Angeles Citywide General Plan Framework EIR, the projected average water supply in year 2010 for the City of Los Angeles is expected to be 756,500 acre-feet per year while the projected maximum total available water supply is expected to be 1,370,646 acre-feet per year.¹⁴ Based on the a Citywide water use of approximately 667,467 acre-feet in 2000-

¹³Letter from Jim Hammel, Technical Services, Northern Region of The Gas Company, to Carrie Riordan of Planning Associates, Inc. May 9, 2002.

¹⁴Los Angeles Citywide General Plan Framework EIR, Section 2.6.3.6 Projected Water Supply.

2001,¹⁵ an increase of approximately 339 acre-feet as a result of the proposed Project would be accommodated by the LADWP projected water supply for 2010. Additionally, a water supply assessment conducted by the LADWP, indicates that the projected growth in water demand from the proposed Project at the Project Site and development scenarios analyzed for the Add Area falls within the range of expected water demand growth within the City.¹⁶ Therefore, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will result in a less than significant water supply impact.

MITIGATION MEASURES

Although a significant impact to the water supply was not identified due to the proposed development of the Project Site and Add Area, the following measures will further reduce any potential impacts to a less than significant level:

85. Install efficient irrigation systems which minimize runoff and evaporation, avoid unnecessary watering, and maximize water reaching the plant roots. (O, C, R)
86. Landscape plans shall emphasize low water consumption grasses wherever possible. (O, C, R)
87. Water in fountains, ponds, and other landscape features shall use recirculating water systems to prevent waste. (O, C, R)
88. Incorporate water saving techniques, including water conserving plumbing, low flow toilets, showers, and faucets. (O, C, R)
89. Landscaped areas shall comply with the Xeriscape Ordinance and emphasize drought tolerant landscaping to reduce irrigation water consumption. (O, C, R)
90. Compliance with State and Health and Safety Code Section 17921.3 requiring low-flush toilets, as defined by the American National Standards Institute A112.19.2, and urinals that use less than 1.5 gallons per flush. (O, C, R)

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

¹⁵City of Los Angeles DWP, Water Resources Business Unit. *Final Year 2000 2001 Urban Water Management Plan Update*.
www.ladwp.com/water/supply/index.htm

¹⁶LADWP WSA. Baseline water consumption for the proposed Project was based on estimates of Sewer Generation Rates developed by the City of Los Angeles DPW, Bureau of Engineering. Sewer Generation Rates provide an approximation of the amount of water used in various facilities within the City of Los Angeles.

CUMULATIVE IMPACTS

Related Projects

Related projects are anticipated to consume a total of approximately 1,726,187 gallons per day (1,934 acre-feet per year). This cumulative increase could produce an area-wide adverse impact, given potential drought conditions and current and future State and local conservation objectives. However, based on Citywide water demand of approximately 667,467 acre-feet in 2000-2001, an increase of approximately 1,934 acre-feet as a result of related projects would be accommodated by the projected water supply.

Further, as with the proposed Project, each related project requiring discretionary approval would be subject to environmental review and to appropriate water conservation requirements and mitigation measures. Local water line capacity for each related project can only be determined on a project-specific basis. Therefore, related projects in the project area may result in a significant impact to water resources. However, with a site-specific water assessment and incorporation of site-specific mitigation measures, any significant impacts as a result of related projects in the area will be reduced to a less than significant level.

Project Site, Add Area, and Related Projects

The proposed cumulative water demand as a result of the proposed development scenarios at the Project Site and Add Area in combination with related projects is approximately 2,273 acre-feet annually. Based on the Citywide water demand of approximately 667,467 acre-feet in 2000-2001,¹⁷ an increase of approximately 2,273 acre-feet as a result of proposed and related projects would be accommodated by the expected supply. Additionally, a water supply assessment would need to be conducted on a project-specific basis for all related projects. Therefore, it is expected that LADWP will have sufficient water supplies to serve the project's needs during normal and drought conditions and will not require additional infrastructure improvements. As a result, a cumulative impact to the water supply is not anticipated.

20. SANITARY SEWERS

ENVIRONMENTAL IMPACTS

The project area is currently served by the Tillman Water Reclamation Plant. The proposed Project will increase sewage generation by approximately 276,978 gallons per day (gpd). Based on an operating capacity of 80,000,000 gpd and a daily collection of 40,382,924 gpd in 1990, an increase of approximately 276,978 gpd would not exceed capacity of the Tillman WRP. The

¹⁷Final Year 2000 2001 Urban Water Management Plan Update

proposed Project at the Project Site and development scenarios analyzed for the Add Area will not require expansion or development of new facilities. Therefore, the proposed development scenarios will result in a less than significant impact to regional sewage treatment plants.

According to the City of Los Angeles - Bureau of Engineering, it is likely that the Corbin Avenue and Nordhoff Street sewers have adequate capacity to facilitate construction of the proposed Project at the Project Site and development scenarios analyzed for the Add Area.¹⁸ In 1969/1970, the City's entire sewer system was analyzed with consideration of population projections to ascertain those portions of the system where capacity deficiencies were anticipated in the future. Based on a gross area of approximately 58 acres and a flow coefficient of .008 cubic feet per second (cfs) average per gross acre, the subject area was tabulated for a contributory average flow of .46 cfs. The sewer systems in Nordhoff Street and Corbin Avenue, both contiguous to the subject property, provide sufficient capacity to adequately convey all tributary flow, including the .46 cfs average resulting from the development scenarios at the Project Site and Add Area.¹⁹ Therefore, the proposed Project at the Project Site and development scenarios analyzed for the Add Area will result in a less than significant impact to local sewers in the area.

However, if development upstream of or within the Add Area does occur, local sewers in Melvin Avenue, Prairie Street, and Shirley Avenue must be studied independently for capacity sufficiency.

MITIGATION MEASURES

91. Although a significant impact is not expected on local sewer lines as a result of the development scenarios analyzed, as development is proposed for the Add Area, local sewers in Melvin Avenue, Prairie Street, and Shirley Avenue must be studied independently for capacity sufficiency prior to project approval. (O, C, R)

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

¹⁸Letter from Frank V. Bonoff, District Engineer, Valley District Office, to Carrie Riordan, Planning Associates, Inc., October 7, 2002.

¹⁹Letter from Frank V. Bonoff, District Engineer, Valley District Office, to Carrie Riordan, Planning Associates, Inc., October 7, 2002.

CUMULATIVE IMPACTS

Related Projects

Related projects in the area will generate approximately 1.6 mgd of sewage. An addition of 1.6 mgd would increase daily collection in the City to approximately 41.9 mgd, which will not exceed the current capacity 80.0 mgd capacity at Tillman WRP. Further, based on a projected daily collection of 55.9 mgd in 2010, the projected increase would not exceed the current capacity of 80.0 mgd at the Tillman WRP. Therefore, related projects in the area would not require expansion or construction of new facilities and would result in a less than significant impact to regional sewers or sewage treatment in the area. However, related projects not yet under construction would be subject to ordinances restricting the issuance of building permits based on the availability of allotted monthly sewer capacity. This restriction prevents exceedence of sewage treatment capacity and prevents any significant impact.

Project Site, Add Area, and Related Projects

The development scenarios analyzed for the Project Site and Add Area, as well as related projects in the area, will generate approximately 1.8 mgd of new sewage. Based on existing 40.4 mgd collected at the Tillman WRP, this addition would increase the total amount collected to 42.2 mgd which would not exceed the current capacity of 80.0 mgd. Further, the projected collection at the Tillman WRP in 2010 is 55.9 mgd. The addition of 1.8 mgd would increase the total daily collection to 57.7 mgd, which would not exceed the current capacity of 80.0 mgd. Therefore, a significant cumulative impact to sewage treatment is not expected.

However, related projects not yet under construction would be subject to ordinances restricting the issuance of building permits based on the availability of allotted monthly sewer capacity. This restriction prevents exceedence of sewage treatment capacity and prevents any significant cumulative impact.

21. SOLID WASTE AND DISPOSAL

ENVIRONMENTAL IMPACTS

The proposed Project at the Project Site and development scenarios analyzed for the Add Area would generate a maximum of approximately 41,425 tons of debris during the demolition and construction phase. Based on the materials utilized during construction, it is assumed that a portion of the debris could be recycled. The remainder of the construction debris will be disposed of within a landfill.

Any waste generation resulting from the construction phase would be temporary in nature and would not result in long-term disposal of waste into any one landfill. Based on the temporary nature of the construction phase and the limited amount of debris generated, the proposed Project would result in a less than significant impact to solid waste generation during the construction phase.

The proposed Project at the Project Site would generate a maximum of 7,486 pounds per day of solid waste, an increase of approximately 4,828 pounds per day, or approximately 753 tons per year. The development scenarios analyzed for the Add Area will generate a maximum of 3,516 pounds per day of solid waste, a decrease of approximately 5,114 pounds per day, or approximately 798 tons per year. The development scenarios analyzed for the Project Site and Add Area will result in a net reduction in solid waste generation of 286 pounds of solid waste per day, or 45 tons per year.

To completely assess the impact of solid waste generation resulting from the proposed Project at the Project Site and development scenarios analyzed for the Add Area on landfill capacity would require detailed information from the contracted private waste collector. However, at this time, precise information for waste collection is not available and precise impacts to solid waste disposal cannot be determined. For assessment purposes, a worst-case analysis was performed that assumes all project-generated waste would be disposed of exclusively at one of the landfills currently accepting privately collected solid waste. Utilizing a worst case assessment scenario for both the increase in solid generation at the Project Site and the decrease at the Add Area, the impacts at each of the possible disposal sites was determined.

The net reduction in solid waste generation would not cause any of the individual landfills to reach or exceed capacity and will not require expansion of existing facilities or the construction of new facilities. Therefore, a less than significant impact on solid waste is expected as a result of the proposed development scenarios at the Project Site and Add Area.

MITIGATION MEASURES

Although a significant impact to solid waste was not identified due to implementation to the proposed Project at the Project Site and development scenarios analyzed for the Add Area, any potential impacts will be further reduced to a less than significant level by the following mitigation measures:

92. The project applicant shall salvage and recycle construction and demolition materials to the maximum extent feasible. Documentation of a recycling program will be provided to the City of Los Angeles DPW. (O, C, R)

93. Prior to the issuance of the certificate of occupancy for building permits issued for new building construction at the Project Site or Add Area, the applicant shall institute an on-site recycling/conservation program to reduce the volume of solid waste going to landfills in compliance with the City of Los Angeles goal of a 50 percent reduction in the amount of waste going to landfills. (O, C, R)

LEVEL OF IMPACT AFTER MITIGATION

Less than significant.

CUMULATIVE IMPACTS

Related Projects

Related projects in the area of the proposed Project will increase solid waste generation in the project area by approximately 61,623 pounds per day, or approximately 9,614 tons per year.

To completely assess the impact of an increase in solid waste generation due to related projects on landfill capacity would require detailed information from the contracted private waste collector. However, at this time, precise information for waste collection is not available and precise impacts to solid waste disposal cannot be determined. For assessment purposes, a worst-case analysis was performed that assumes all related project-generated waste would be disposed of exclusively at one of the landfills currently accepting privately collected solid waste. Utilizing a worst case assessment scenario, related projects would not cause any of the individual landfills to reach or exceed capacity and will not require expansion of existing facilities or the construction of new facilities. Therefore, related projects will result in a less than significant impact on solid waste.

Project Site, Add Area, and Related Projects

Development scenarios analyzed for the Project Site and Add Area in combination with related projects will increase solid waste generation in the project area by approximately 61,337 pounds per day, or approximately 9,569 tons per year.

A worst-case analysis indicated that this solid waste generation would not cause any of the individual landfills to reach or exceed capacity and will not require expansion of existing facilities or the construction of new facilities. Therefore, a significant cumulative impact to solid waste is not anticipated.

D. PROJECT ALTERNATIVES

INTRODUCTION

Per CEQA Section 15126.6, an EIR shall describe and analyze a range of potential alternatives to the proposed Project. Per Section 15126.6(a), "...an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives...it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible. The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternative. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."

CEQA Section 15126.6(c) sets forth guidelines for the selection of a range of reasonable alternatives. "The range of potential alternatives to the proposed Project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination."

As part of the alternative analysis, per CEQA Section 15126.6(e), the EIR must evaluate the No Project Alternative. The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. The No Project Alternative should analyze the impacts that would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

As a result of the selection and analysis of project alternatives, an environmentally superior alternative must be designated. If the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

ALTERNATIVES CONSIDERED BUT REJECTED

Public Facilities - Police Substation. CEQA Guidelines require that, "An EIR shall describe a range of reasonable alternatives to the project...which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project...".

One of two significant environmental impacts identified in the proposed Project analysis was to police protection services. To reduce potential impacts to police protection services, an alternative that considered the construction of a new a police Substation or Area Station in the project area was considered. In addition to trying to reduce potential Project impacts, the LAPD had indicated that they are seeking to locate an additional station in the southwest portion of the San Fernando Valley.²⁰ This alternative was proposed to the LAPD but was determined to be an impractical location for a new Area Station due to its close proximity to the existing Devonshire Area Station (about 3 miles).²¹ Construction of a new police substation was also dismissed as impractical by the LAPD due to lack of staffing and equipment budgets.²²

ALTERNATIVES CONSIDERED

Alternatives analyzed in addition to the proposed Project include:

1. No Project Alternative
2. All Residential Alternative
3. Reduced Project Alternative
4. Alternative Project Site Alternative (similar project scope)

An expanded discussion of Alternatives Considered is provided in **Section VII: Alternatives** of this document.

1. No Project Alternative

Currently, the proposed Project Site is developed with approximately 310,000 square feet of office space, approximately 12,000 square feet of manufacturing space, and approximately 4,000 square feet of storage space. Under the No Project Alternative, it was assumed that no changes to the Project Site would occur and that existing development would remain on Site, condition unchanged. However, consistent with current plans for the Project Site, the previously approved Homeplace Retirement Community would be constructed as planned. It was also assumed that properties within the Add Area would not be redeveloped under the No Project Alternative.

The main building at the facility is currently occupied by Litton Guidance and Control Systems. Their lease on the building and property extends until 2005 at which time it is the intent of Litton Industries to vacate the property and move operations elsewhere. The applicant has made the following attempts to identify a future user of the property with the same intended land use:

²⁰ Email between Maya Zaitzevsky, LADCP Environmental Review Section, and Yvette Sanchez-Owens, LAPD, February 12, 2003.

²¹ Email between Maya Zaitzevsky, LADCP Environmental Review Section, and Joanne Ma, LAPD, February 14, 2003.

²² Email between Maya Zaitzevsky, LADCP Environmental Review Section, and Yvette Sanchez-Owens, LAPD, February 12, 2003.

- Northrop Grumman, the parent company of Litton Industries, has attempted through their industry network to identify another user for the Project Site.
- CRESA Partners, a well respected brokerage firm in the project area, has been actively marketing the site through several methods trying to find a replacement tenant including large marketing signs on site, cold calling potential users for the site, networking throughout the brokerage community, flyers, and listing the site on websites of the most widely used for listing commercial real estate.
- Through word of mouth and corporate connections, the applicant has put word out that the space is available for lease and has attempted to contact specific development opportunities for this site.

However, due to current market forces within the San Fernando Valley, the applicant has been unable to identify a future industrial tenant for the Project Site. Therefore, the No Project Alternative would result in vacation of the Project Site by the current tenant and existing buildings would be left unoccupied. Empty buildings can result in blight for the project area.

The Add Area is currently comprised of approximately fifteen individual parcels, all of which are currently developed. However, the Add Area properties are not currently under the applicant's control and each property has a separate owner. Therefore, it was assumed that none of the Add Area properties would be redeveloped under the No Project Alternative.

This alternative satisfies the CEQA requirement for a No Project Alternative comparison.

2. All Residential Alternative

The All Residential Alternative would include replacement of existing development on the Project Site and Add Area with multifamily residential units. As previously approved, the Homeplace Retirement Community would be constructed on an approximately eight acre parcel of the Project Site, located at the southeastern corner of the Corbin Avenue and Prairie Street.

In accordance with the requested Zone Change from MR2-1, [T][Q]M1-1, and P-1 to C2-1, the C2-1 Zone permits one dwelling unit per 400 square feet. Based on this allowance, the All Residential Alternative at the Project Site would include a maximum of 2,994 dwelling units in addition to the Homeplace Retirement facility (389 independent senior living units, 35 assisted living units). The All Residential Alternative would include a maximum 1,666 dwelling units on the Add Area properties. Overall, the All Residential Alternative would result in the construction of approximately 4,660 dwelling units, 389 senior housing units, and 35 assisted living units.

It should be noted that the All Residential Alternative could also be accomplished under a General Plan Amendment to High Medium Residential and a consistent Zone Change to R4. All service and utility providers for the All Residential Alternative will be similar to those of the proposed Project.

Due to the existing industrial use of the Project Site and Add Area and the commercial use proposed under the Project, an All Residential Alternative was determined to be a reasonable alternative use of the Project Site and Add Area.

3. Reduced Project Alternative

Under the Reduced Project Alternative, existing development at the Project Site and Add Area would be replaced by a project approximately one third the size of the proposed Project. The Reduced Project Alternative would include approximately 371,250 square feet of office space, approximately 132 condominium units, and a senior housing facility consisting of approximately 128 independent living units and 11 senior housing units.

The Reduced Project Alternative is based on the need to reduce air quality impacts anticipated from the proposed Project. This Alternative assumes that, as with the proposed Project, both the Project Site and Add Area would be redeveloped. Selection of a development scenario was based on reducing the proposed Project to a size that would not exceed the SCAQMD thresholds for air quality. Based on an air quality analysis prepared for the proposed Project, it was determined that to reduce the air quality impacts of the least significant development scenario below the established thresholds, the project must be reduced by approximately 67 percent. In effect, the Reduced Project Alternative is one third the size of the proposed Project. It is assumed under the Reduced Project Alternative that the Homeplace Retirement facility would be developed but would be reduced in size as well.

All service and utility providers for the Reduced Project Alternative will be similar to those of the proposed Project.

4. Alternative Project Site Alternative

Under the Alternative Project Site alternative, includes analysis of a project similar in scope to the proposed Project but located at an Alternative Project Site. As discussed in Section VII of this document, due to similarities between the Alternative Project Site and the Project Site/Add Area and the feasibility of constructing a project similar in scope to the proposed Project on this site, the Alternative Project Site alternative was determined appropriate for further analysis.

The Alternative Project Site alternative would not include construction of the Homeplace Retirement facility. All potential impacts are assumed to be the worst-case scenario.

5. Environmentally Superior Alternative

CEQA Section 15126.6 requires the selection of an environmentally superior alternative to the proposed Project. Although the No Project Alternative must be analyzed, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Generally, the environmentally superior alternative is that which is considered to result in the generation of the least significant environmental impacts. In this instance, the Reduced Project Alternative would be considered the environmentally superior alternative. The proposed Project is anticipated to result in two significant impacts: operational air quality and police protection services. The Reduced Project Alternative would reduce to a less than significant level the operational air quality impact anticipated from the proposed Project and would result in a significant impact to only police protection services. Therefore, the Reduced Project Alternative would result in only one significant environmental impact which is police protection services.

III. CORRECTIONS AND ADDITIONS

The following corrections and additions are set forth to update the Draft MEIR based on comments received during and after the 45-day public review period. Each correction and/or addition is identified by the corresponding page number from the Draft MEIR, the Section title from the Draft MEIR, and the location of the requested correction and/or addition.

1. **Page 19, Section I. Summary, C. Summary of Impacts and Mitigation Measures, add the following mitigation measure after Mitigation Measure No. 28:**

28a. If during construction of the project, soil contamination is encountered, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exist, a registered geologist should be contacted to examine the contaminated materials and prepare a report on the findings of a soil analysis. This report should identify which government agency will provide regulatory oversight.

2. **Page 39, Section I. Summary, C. Summary of Impacts and Mitigation Measures, add the following mitigation measures after Mitigation Measure No. 57:**

57a. During demolition, the Fire Department access will remain clear and unobstructed.

57b. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

57c. No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

57d. Private street shall be recorded as Private Streets, AND Fire Lane. All private street plans shall show the words "Private Street and Fire Lane" within the private street easement.

57e. No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.

57f. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

57g. Submit plot plans for Fire Department approval of access and fire hydrants.

3. **Page 41, Section I. Summary, C. Summary of Impacts and Mitigation Measures, add the following mitigation measures after Mitigation Measure No. 62:**
 - 62a. During the development stage of the project, Devonshire Area of the Los Angeles Police Department (LAPD) will provide extra patrol for the location when possible.
 - 62b. The on-site project manager will maintain regular liaison with the Devonshire Area Senior Lead Officer for the location during development.
 - 62c. Upon completion and staffing, the on-site management will establish a liaison with the Senior Lead Officer.
 - 62d. The on-site management and residents of the development will establish an Apartment/Condo Watch group for crime prevention.
 - 62e. Quarterly Apartment Watch meetings will be conducted by the Senior Lead Officer at the site initially addressing emergency services available, communications with the LAPD, organizations and functions of the LAPD, senior crimes and identity theft.

4. **On Page 130, Section IV. Environmental Impact Analysis, B. Air Quality, the first Operational Mitigation Measure should be Number 21, rather than Number 2. The corrected mitigation measure should read:**
 21. A person conducting active operations within the boundaries of the South Coast Air Basin shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type which is part of the active operation. (O, C, R)

5. **Page 137, Section IV. Environmental Impact Analysis, B. Air Quality, the *Construction Mitigation Measures* should have a corresponding number and be identified as Office(O), Retail(C), and/or Residential(R) corresponding to the type of development that will trigger the mitigation measure. Therefore, the Construction Mitigation Measures on Page137 should read:**
 7. The construction area and vicinity (500-foot radius) shall be swept (preferably with water sweepers) and watered at least twice daily. Site-wetting shall occur often enough to maintain a 10 percent surface soil moisture content during all earth-moving activities. (O, C, R)

8. All unpaved roads, parking, and staging areas shall be watered at least once every two hours of active operations. (O, C, R)
9. Site access points shall be swept/washed within thirty minutes of visible dirt deposition. (O, C, R)
10. On-site stockpiles of debris, dirt, or rusty material shall be covered or watered at least twice daily. (O, C, R)
11. All trucks hauling soil, sand, and other loose materials shall be covered. (O, C, R)
12. All haul trucks shall have a capacity of no less than twelve and three-quarter (12.75) cubic yards. (O, C, R)
13. At least 80 percent of all inactive disturbed surface areas shall be watered on a daily basis when there is evidence of wind-driven fugitive dust. (O, C, R)
14. Operations on any unpaved surfaces shall be suspended when winds exceed 25 mph. (O, C, R)
15. Traffic speeds on unpaved roads shall be limited to 15 miles per hour. (O, C, R)
16. Operations on any unpaved surfaces shall be suspended during first and second stage smog alerts. (O, C, R)
17. Haul truck routes shall be planned to avoid residential areas, schools, and parks. (O, C, R)
18. The proposed Project shall use coating transfers or spray equipment with a transfer efficiency rate of no less than 65 percent. (O, C, R)
19. A person shall not cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that the presence of such dust remains visible in the atmosphere beyond the property line of the emission source. (O, C, R)
20. Any person in the South Coast Air Basin shall:
 - (A) prevent or remove within one hour the track-out of bulk material onto public paved roadways as a result of their operations; or (O, C, R)

(B) take at least one of the actions listed from SCQAMD Rule 403 and: (O, C, R)

(i) prevent the track-out of bulk material onto public paved roadways and remove such material at any time track-out extends for a cumulative distance of greater than 50 feet on any paved public road during active operations; and

(ii) remove all visible roadway dust tracked-out upon public paved roadways as a result of active operations at the conclusion of each work day when active operations cease.

6. **Page 143, Section IV. Environmental Impact Analysis, B. Air Quality, the *Operational Mitigation Measures* should have a corresponding number and be identified as Office(O), Retail(C), and/or Residential(R) corresponding to the type of development that will trigger the mitigation measure. Therefore, the Operational Mitigation Measures on Page143 should read:**

21. A person conducting active operations within the boundaries of the South Coast Air Basin shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type which is part of the active operation. (O, C, R)

20. Any person in the South Coast Air Basin shall:

(A) prevent or remove within one hour the track-out of bulk material onto public paved roadways as a result of their operations; or (O, C, R)

(B) take at least one of the actions listed from SCQAMD Rule 403 and: (O, C, R)

(i) prevent the track-out of bulk material onto public paved roadways as a result of their operations and remove such material at anytime track-out extends for a cumulative distance of greater than 50 feet on to any paved public road during active operations; and

(ii) remove all visible roadway dust tracked-out upon public paved roadways as a result of active operations at the conclusion of each work day when active operations cease.

22. The proposed Project shall include bicycle parking facilities, such as bicycle lockers and racks. (O, C)

7. **Page 197, Section IV. Environmental Impact Analysis, E. Hazardous Materials, add the following mitigation measure after Mitigation Measure No. 28:**

28a. If during construction of the project, soil contamination is encountered, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exist, a registered geologist should be contacted to examine the contaminated materials and prepare a report on the findings of a soil analysis. This report should identify which government agency will provide regulatory oversight.

8. **Page 271, Section IV. Environmental Impact Analysis, K. Public Services, Fire, add the following mitigation measures after Mitigation Measure No. 57:**

57a. During demolition, the Fire Department access will remain clear and unobstructed.

57b. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

57c. No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

57d. Private streets shall be recorded as Private Streets, AND Fire Lane. All private street plans shall show the words "Private Street and Fire Lane" within the private street easement.

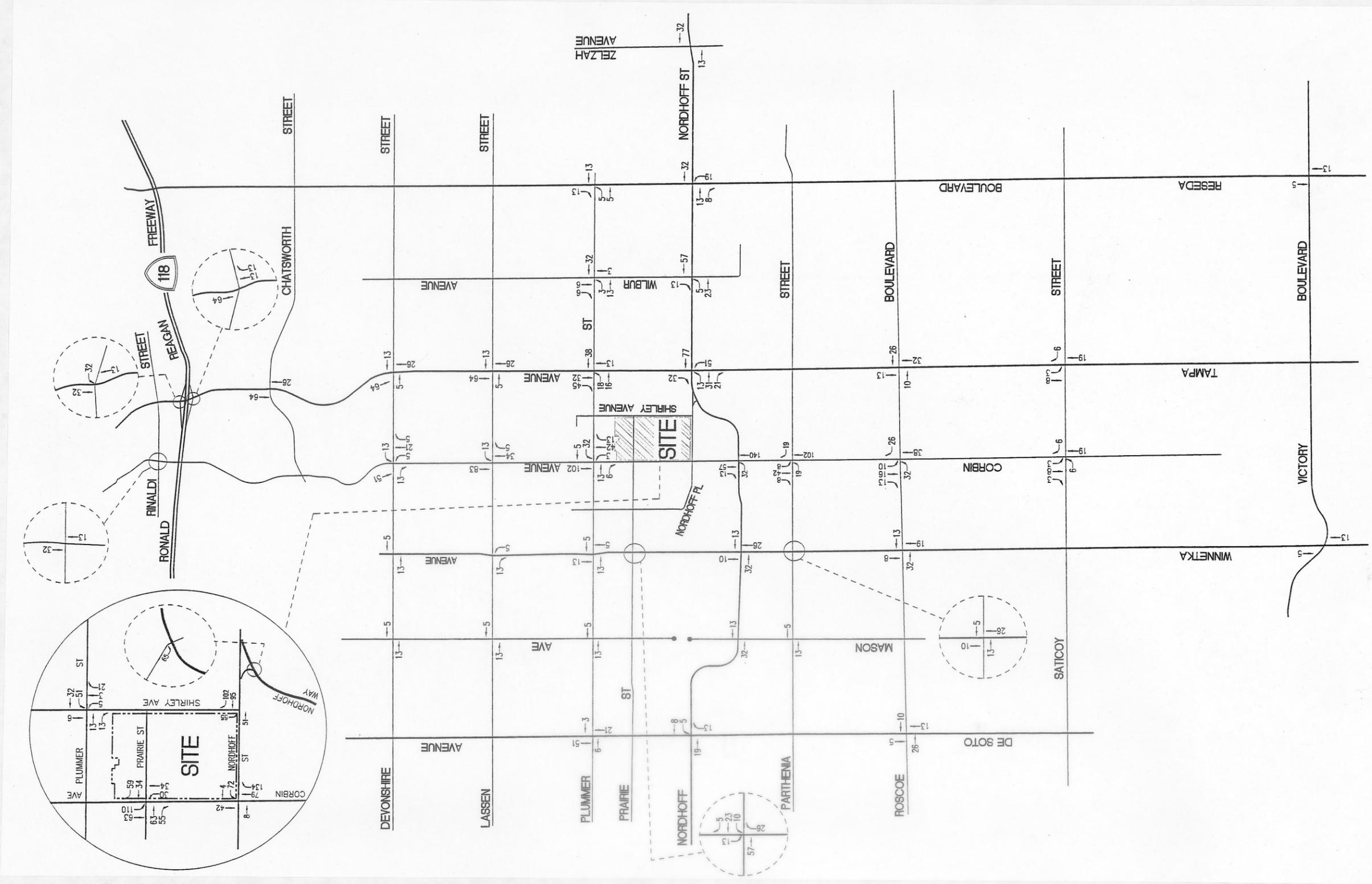
57e. No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.

57f. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction

57g. Submit plot plans for Fire Department approval of access and fire hydrants.

9. **Page 275, Section IV. Environmental Impact Analysis, K. Public Services, Police, add the following mitigation measures after Mitigation Measure No. 62:**

- 62a. During the development stage of the project, Devonshire Area of the Los Angeles Police Department (LAPD) will provide extra patrol for the location when possible.
 - 62b. The on-site project manager will maintain regular liaison with the Devonshire Area Senior Lead Officer for the location during development.
 - 62c. Upon completion and staffing, the on-site management will establish a liaison with the Senior Lead Officer.
 - 62d. The on-site management and residents of the development will establish an Apartment/Condo Watch group for crime prevention.
 - 62e. Quarterly Apartment Watch meetings will be conducted by the Senior Lead Officer at the site initially addressing emergency services available, communications with the LAPD, organizations and functions of the LAPD, senior crimes and identity theft.
10. *Due to a printing error, **Figure 37: Project Traffic Volumes PM Peak Hour with Scenario 3: Retail/Residential Full Build Out** was missing in the Draft MEIR. Please insert **Figure 37: Project Traffic Volumes PM Peak Hour with Scenario 3: Retail/Residential Full Build Out** (as attached) on Page 362, behind **Figure 37: Project Traffic Volumes AM Peak Hour with Scenario 3: Retail/Residential Full Build Out**.*
11. **The title of the first mitigation measure on Page 403 of Section IV. Environmental Impact Analysis, M. Traffic should read:**
- 67. Transportation Demand Management Measures
12. **The title of the first mitigation measure on Page 404 of Section IV. Environmental Impact Analysis, M. Traffic should read:**
- 68. ATSAC/ATCS Measures
13. **Due to printing error, in the *Technical Appendices Volume III*, “Appendix D5: Krausz Property Only Alternative C with Mitigation Traffic Volumes, AM Peak Hour, Krausz Property Project” was inserted in the wrong place. While the Appendix D5 was included in Volume III of the Technical Appendices, Appendix D4 and D6 were printed double sided and Appendix D5 was inserted, single-sided, behind Appendix D6 rather than D4 and D5 printed double-sided, D6 and D7 double-sided, etc.. This is just a note to identify the misplacement.**



IV. COMMENTS AND RESPONSES

CITY OF LOS ANGELES FIRE DEPARTMENT (LAFD)

COMMENT 1.1

The project site consists of a square parcel approximately 35.5-acres in size, bounded by Prairie Street on the north, Corbin Avenue to the west, Nordhoff Street to the south, and Shirley Avenue to the east. At the direction of Planning Department staff, a rectangular “Add Area” approximately 15 acres in size bounded by the southern property line of commercial properties that front Plummer Street on the north, Corbin Avenue to the west, Prairie Street to the south, and Shirley Avenue to the east has been included as part of the analysis of a General Plan Amendment and Zone Change proposed for the site. The “Add Area” is not under the control of the applicant. It is currently developed and consists of 15 separate parcels of land, each under separate ownership.

The project site is located within the Chatsworth-Porter Ranch Community Plan Area. The proposed project includes a General Plan Amendment from Light Industrial to Community Commercial and a Zone Change from [T][Q]M1-1, MR2-1 and P-1 to C2-1.

Because a specific development proposal is not being made as part of this report, Planning Department Staff has directed that a Draft Master Environmental Impact (DMEIR) Report be prepared for this project. Four worst-case development scenarios for the project area (35.5 acres) and four potential development scenarios for the “Add Area” (15 acres) are presented.

Project Area

Scenario 1: Retail

340,000 square feet Retail
389 Senior Housing units
35 Assisted Living units

Scenario 2: Office

930,000 square feet Office
389 Senior Housing units
35 Assisted Living units

Scenario 3: Retail/Residential

250,000 square feet Retail
300 Condominium units
389 Senior Housing units
35 Assisted Living units

Scenario 4: Office/Residential
690,000 square feet Office
300 Condominium units
389 Senior Housing units
35 Assisted Living units

“Add Area”

Scenario 1: Retail
200,000 square feet Retail

Scenario 2: Office
586,000 square feet Office

Scenario 3: Retail/Residential
150,000 square feet Retail
100 Condominium units

Scenario 4: Office/Residential
435,000 square feet Office
100 Condominium units

These proposals were analyzed separately creating a total of eight potential development scenarios. For purposes of this reply to the DMEIR, because the development proposed includes commercial elements and may, depending on the scenario selected, in fact be predominantly commercial, both the project area and the “Add Area” will be regarded as commercial developments.

The following comments are furnished in response to your request for this Department to review the proposed development:

C. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department’s judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (GPM) in low-density Residential areas to 12,000 GPM in high-density commercial or industrial area. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system, with the required

gallons per minute flowing. The required fire-flow for this project has been set at 6,000 - 9,000 GPM from 4 to 6 fire hydrants flowing simultaneously.

D. Response Distance, Apparatus, and Personnel

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 104
8349 Winnetka Avenue
Canoga Park, CA 91306
Single Engine Company
Paramedic Rescue Ambulance
Staff - 6
Miles - 1.5

Fire Station No. 103
18143 Parthenia Street
Northridge, CA 91324
Single Engine Company
Staff - 4
Miles - 2.0

Fire Station No. 107
20225 Devonshire Street
Chatsworth, CA 91311
Single Engine Company
Paramedic Rescue Ambulance
Staff - 6
Miles - 2.2

The above distances were computed to 19601 Nordhoff Street.

Based on these criteria (response distance from existing fire stations), fire protection would be considered inadequate.

E. Firefighting Access

During demolition, the Fire Department access will remain clear and unobstructed.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

Private streets shall be recorded as Private Streets, AND Fire Lane. All private street plans shall show the words "Private Street and Fire Lane" within the private street easement.

No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.

Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

All structures shall be sprinklered.

Submit plot plans for Fire Department approval of access and fire hydrants.

CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

For additional information, please contact Inspector Griffin of the Construction Services Unit at (213)482.6506.

WILLIAM R. BARMATTRE
Fire Chief

RESPONSE 1.1

The comments are consistent with those provided by the Fire Department in their letter of July 25, 2002, and are consistent with the findings in **Section IV. Environmental Impact Analysis, K. Public Services 1. Fire (Pages 265-271)** of the Draft MEIR. With the exception of more specific mitigation measures regarding Fire Department access during demolition, distance from edge of roadways to dwelling unit entrance and exitways, timing of framing, private street and fire lane identification, hydrant location and installation, and submittal of plot plans, all mitigation measures identified by the commenter are included in the Draft MEIR. Inclusion of the additional mitigation measures further reduces the less than significant impact noted in the Draft MEIR. See **Section III, Corrections and Additions** Numbers 2 and 8 for the additional mitigation measures.

CITY OF LOS ANGELES POLICE DEPARTMENT (LAPD)

COMMENT 2.1

After reviewing the Draft Master Environmental Impact Report regarding the proposed development at Corbin Avenue and Nordhoff Street, Devonshire Area proposes the following crime deterrent actions:

- During the development stage of the project, Devonshire Area of the Los Angeles Police Department (LAPD) will provide extra patrol for the location when possible.
- The on-site project manager will maintain regular liaison with the Devonshire Area Senior Lead Officer for the location during development.
- Upon completion and staffing, the on-site management will establish a liaison with the Senior Lead Officer.
- The on-site management and residents of the development will establish and Apartment/Condo Watch group for crime prevention.
- Quarterly Apartment Watch meetings will be conducted by the Senior Lead Officer at the site initially addressing emergency services available, communications with the LAPD, organizations and functions of the LAPD, senior crimes and identity theft.

For further information, please contact Senior Lead Officer Don Graham at (818)363.1726, via his voicemail at (818)756.9011, ext 1755.

RESPONSE 2.1

The mitigation measures proposed by the commenter are consistent, but more specific than those in the Draft MEIR. Inclusion of the additional mitigation measures does not change the finding of the Draft MEIR. See **Section III, Corrections and Additions** Numbers 3 and 9 for the additional mitigation measures.

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS, BUREAU OF ENGINEERING, LAND DEVELOPMENT GROUP

COMMENT 3.1

The staff of the Bureau of Engineering has reviewed your referral dated September 11, 2003, in regard to the aforementioned DMEIR. The Bureau of Engineering has no comments at this time in addition to our previous comments dated January 14, 2003.

Should you have any questions in this regard, please call Ray Saidi at (213)977.7097.

RESPONSE 3.1

Comment acknowledged. The "previous comments dated January 14, 2003" referenced by the commenter are included in Appendix A of the Draft MEIR. The comments and concerns of the Bureau of Engineering were included in the preparation of the Draft MEIR.

**CITY OF LOS ANGELES, BUREAU OF SANITATION
WASTEWATER ENGINEERING SERVICES DIVISION**

COMMENT 4.1

This is in response to your September 11, 2003 request for comment on the draft master environmental impact report of the proposed project. The following are comments from the Bureau of Sanitation, Wastewater Engineering Services Division, on the proposed project and a preliminary evaluation of potential impacts on the wastewater services related to the proposed site.

Review of the projected wastewater flows, the corresponding flow generation factors, wye-maps showing existing sewer lines to the proposed site, and sewer lines capacities indicate the following:

The Projected Wastewater Discharges (Scenario 4: Office/Residential) for the Proposed Project:

Type Description (land use)	Generation Rate per Type Description (GPD/UNIT)	Amount of Unit per Use	Sewage Generation (GPD)
Office	200/1000 sf	690,000 sf	138,000
Condominiums	150/du	300 du	45,000
Senior Housing Units	150/du	389 du	58,350
Assisted Living Units	85/du	35 beds	2,975
Total			244,325

The local sewers in the project area include:

Eight-inch diameter sewer in Prairie Street,
 Eight-inch diameter sewer in Melvin Avenue,
 Ten-inch diameter sewer in Shirley Avenue,
 12-inch diameter sewer in Corbin Avenue, and
 18-inch diameter sewer in Nordhoff Street.

Ultimately, this sewage flow will be conveyed to the Tillman Water Reclamation Plant (TWRP) in the San Fernando Valley for treatment. Any flow not treated at TWRP will be conveyed downstream for treatment of the City's Hyperion Treatment Plan [sic] in Playa del Rey.

RESPONSE 4.1

Comment acknowledged. Commenter is referred to the Draft MEIR, Section IV. Environmental Impact Analysis, N. Utilities, 4. Sewers where information regarding the proposed sewage generation, existing sewers in the project area, and existing wastewater treatment facilities is provided. Information was gathered from the City of Los Angeles Wastewater Program Management, Sewer Facilities Charge Guide and Generation Rates and from written correspondence, dated October 7, 2002, from Frank V. Bonoff, District Engineer.

COMMENT 4.2

Although a significant impact is not expected on the local sewer lines and the treatment facilities, the necessary permit application and process will still be required when this development gets underway which is processed through the Bureau of Engineering. This office may then conduct a sewer availability study to thoroughly evaluate the additional flow impact to the system concurrent with the Bureau of Engineering permit process and plan check of the proposal. This

may necessitate re-gauging of the flow and calculating the capacities of the sewer line of the area, at that time. It would only be then, that a definite answer to your question of sewer capacity could be answered.

If you have any questions, please call Belal Tamimi of my staff at (323)342-6254.

RESPONSE 4.2

Per written correspondence, dated October 7, 2003, from Frank V. Bonoff, District Engineer, the proposed project at the project site is not anticipated to exceed existing sewer capacity in the project area.²³ Per Page 456 of the Draft MEIR, the Bureau of Engineering has determined by preliminary assessment that existing sewers in the project area have sufficient capacity to adequately serve the proposed project at the project site. According to the written correspondence referenced above, local sewers upstream of the project site located in Shirley Avenue, Melvin Avenue, and Prairie Street were not included in the sewer capacity analysis prepared by the Bureau of Engineering and would require additional examination upon development. The Draft MEIR identifies that if development occurs in the Add Area (upstream of the project site), implementation of the proposed Mitigation Measure No. 91 on Page 459 of the Draft MEIR will be required to ensure that potential infrastructure impacts from this development are adequately studied and/or examined. Therefore, no changes were made to the Draft MEIR.

CITY OF SANTA CLARITA

COMMENT 5.1

Thank you for the opportunity to review and provide comments on ENV-2002-1230-EIR, proposed by Corbin and Nordhoff located at 19601 Nordhoff Street. As stated on the application form, the current proposal includes a Zone Change and Plan Amendment over 43.5 acres in the Chatsworth-Porter Ranch Community Planning Area.

At this time, the City of Santa Clarita does not wish to make any comments on the Draft Master Environmental Impact Report prepared for the proposed project.

Again, thank you for the opportunity to comment on ENV-2002-1230-EIR. If you have any questions, please contact Fred Follstad, AICP, Senior Planner, at (661)255.4330.

²³Proposed project at the project site is identified as that development proposed for the 35.5 acres currently under the control of the applicant. The worst-case development scenario for this parcel was identified in the letter submitted by the commenter.

RESPONSE 5.1

Comment acknowledged.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG)

COMMENT 6.1

Thank you for submitting the Draft Environmental Impact Report for the Corbin and Nordhoff Project to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

It is recognized that the proposed Project considers four potential development scenarios, ranging from 340,000 sq. ft. of retail space to 930,000 sq. ft. of office space on 35.5 acres in the Chatsworth - Porter Ranch Community Planning Area in the City of Los Angeles. The proposed Project will also consider the development of up to 300 condominium units. In addition, each development scenario will also consider the development of 389 senior housing units, and 35 assisted living units. The proposed Project is located at 19601 Nordhoff Street, in the City of Los Angeles.

SCAG staff has evaluated the Draft Environmental Impact Report for the Corbin and Nordhoff Project for consistency with the Regional Comprehensive Plan and Guide and Regional Transportation Plan. The Draft EIR includes a discussion on the proposed Projects' consistency with SCAG policies and applicable regional plans, which were outlined in our June 11, 2002 letter on the Notice of Preparation (NOP) for this Draft EIR.

The Draft EIR, in Section IV-G. Land Use, cited SCAG policies and addressed the manner in which the proposed Project is consistent with applicable core policies and supportive of applicable ancillary policies. The Draft EIR incorporated a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the applicable policies with the proposed Project. This approach to discussing consistency or support of SCAG policies is commendable and we appreciate your efforts. Based on the information provided in the Draft EIR, we have no further comments. A description of the proposed Project was published in the September 1-15, 2003 Intergovernmental Review Clearinghouse Report for public review and comment.

If you have any questions, please contact me at (213)236.1867. Thank you.

RESPONSE 6.1

Comment acknowledged.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

COMMENT 7.1

The Department of Toxic Substances Control (DTSC) has received your Notice of Completion of draft Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

1. The draft EIR states that Phase I Environmental Assessments were prepared by American Environmental Specialist, Inc. (AES) on the Project Site. The EIR should include the government regulatory agency providing the oversight for the Phase I Environmental Assessments.

RESPONSE 7.1

Per Mr. Jim McClung of American Environmental Specialists, Inc. (AES), the preparers of the Phase I Assessments completed at the Project Site and Add Area, there are no federal, state or citywide agencies that oversee the undertaking or preparation of Phase I Assessments.²⁴ The commenter has not identified a specific need why a federal, state, or city agency should have been involved. Therefore, no additions or corrections are required.

COMMENT 7.2

2. If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exist, the EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

RESPONSE 7.2

As identified in the Draft MEIR on Page 194, with adherence to Code requirements, the potential for soil contamination as a result of the proposed Project and development scenarios analyzed for

²⁴Phone conversation between Mr. Jim McClung, American Environmental Specialists, Inc. (AES), and Carrie Riordan, Planning Associates, Inc., October 27, 2003.

the Add Area is considered to be less than significant. The commenter has identified a more specific protocol to ensure that any unidentified soil contamination encountered during construction will be mitigated. As a result, a mitigation measure has been added. Inclusion of the additional mitigation measure does not change the finding of the Draft MEIR. See **Section III, Corrections and Additions** Nos. 1 and 7.

COMMENT 7.3

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at www.dtsc.ca.gov.

If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818)551-2870 or me, at (818) 551-2877.

Sincerely, Harlan R. Jeche
Unit Chief
Southern California Cleanup Operations Branch - Glendale Branch

RESPONSE 7.3

Comment acknowledged.

STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION (CALTRANS)

COMMENT 8.1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above reference project.

A cumulative traffic impact study should include the State Route 118, all freeway ramps in the vicinity, and Tampa Ave. interchange with queue length analysis along with the proposed development and other related projects including the mitigation measures for the future 20-year traffic conditions.

RESPONSE 8.1

A review of Section IV. Environmental Impact Analysis: M. Traffic of the Draft MEIR shows that the traffic analysis did include a cumulative impact analysis of traffic on State Route 118 and the intersections with the Tampa on and off ramps. Specifically, Pages 387-390 discuss in detail the potential impacts of the project to State Route 118 (SR-118). Forecasted project trips are

summarized in Table 82: Congestion Management Plan Traffic Impact Analysis on Page 389 of the Draft MEIR. As shown, the project will not exceed the established threshold of 150 or more trips during either the AM or PM weekday peak hours to the CMP mainline freeway monitoring locations. Therefore, further review of the SR-118 is not required

The traffic study prepared for the project also provides an analysis of potential traffic impacts at the SR-118 freeway on and off-ramp intersections with Tampa Avenue, the local and convenient SR-118 connection to the project area. As shown on Page 303 of the Draft MEIR, the Tampa Avenue and SR-118 freeway westbound on/off-ramp intersections, as well as the Tampa Avenue and SR-118 freeway on/off-ramp intersections were analyzed as part of the traffic analysis.

The traffic impact study was prepared in accordance with LADOT's Traffic Study Policies and Procedures manual. The traffic analysis evaluated and identifies potential project-related impacts at the year of anticipated build-out year (2005). Analysis of cumulative 20-year conditions exceeds the requirements of CEQA. Section 15130 of the CEQA Guidelines states that:

- (b) "The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. The following elements are necessary to an adequate discussion of significant cumulative impacts
- (b)(1)(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or"

As a result, a 20-year forecast will be speculative in terms of this specific project.

It should be noted that the commenter has not identified an inadequacy with the analysis prepared or the information presented in the Draft MEIR but rather provides a summary of suggestions for alternative models and/or information that could be presented which does not warrant or require that additional analysis be conducted. Therefore, no changes have been made to the Draft MEIR.

COMMENT 8.2

To assist us in our efforts to evaluate the impacts of this project on State transportation facilities, a revised traffic study should be prepared. We wish to refer the project's traffic consultant to our traffic study guidelines Website:

<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

RESPONSE 8.2

As stated earlier, the traffic analysis was prepared per LADOT standards. The guidelines (located at <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>) indicated by the commenter provide only an alternative method by which to conduct a traffic analysis. The project's potential impacts to the State highway system have been adequately addressed by the traffic study prepared for and used in the Draft MEIR based on significance thresholds and analysis methodologies approved by the City of Los Angeles. Furthermore, no evidence as to the inadequacy of the traffic study prepared was presented to warrant the preparation of a revised traffic study as the commenter suggests. Because the commenter has not identified a particular deficiency or inadequacy with the traffic analysis prepared for the project, there is no reason to use the Caltrans traffic study guideline for this project.

COMMENT 8.3

and we list here some elements of what we generally are expecting in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to State Route 118.

RESPONSE 8.3

Review of the Draft MEIR and the traffic study indicates that assumptions and methodologies used to develop the traffic study were presented. Page 310 of the Draft MEIR provides the trip generation assumptions, rates, and forecasts utilized in the traffic analysis. As stated on Page 310 of the Draft MEIR, trip generation forecasts were prepared based on rates provided in the *Trip Generation* manual published by the Institute of Transportation Engineers. The trip distribution and assignment methodology is discussed on Page 315 of the Draft MEIR. The trip generation and trip distribution pattern were reviewed and approved by LADOT prior to inclusion in the Draft MEIR. Therefore, no changes were made to the Draft MEIR.

COMMENT 8.4

2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. The IGR/CEQA office may use indices to check results. Differences or inconsistencies must be thoroughly explained.

RESPONSE 8.4

Regional distribution patterns utilized in the traffic analysis were determined to be consistent with the procedures outlined in the CMP manual. The CMP provides generalized trip distribution factors based on regional modeling efforts. The trip distribution factors show Regional Statistical

Areas (RSAs)-level trip making origins and destinations for work and non-work trip purposes. The regional distribution pattern for the project provides general origin and destination trip distributions from the project study area RSA throughout the Los Angeles Basin. The distribution pattern was reviewed and approved by LADOT prior to inclusion into the Draft MEIR.

The commenter has not identified an inadequacy of the consistency with the modeling forecasts provided in the Draft MEIR, nor did the commenter identify differences or inconsistencies between the IGR/CEQA method suggested with the information/modeling forecasts provided in the Draft MEIR and technical appendices. Therefore, no changes were made to the Draft MEIR.

COMMENT 8.5

3. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects (see next item) and any plan-horizon years.

RESPONSE 8.5

Traffic impact analysis and methodology, impact criteria and thresholds, and traffic impact analysis scenarios were provided in the Draft MEIR. Page 310 of the Draft MEIR provides the thresholds of significance utilized and a discussion of the traffic impact analysis and methodology. Pages 316 and 325 of the Draft MEIR discuss the traffic impact analysis scenarios. Summaries of the v/c ratios and LOS values determined for each of the thirty nine study intersections are shown in Tables 61 through 68 beginning on Page 330 of the Draft MEIR. Descriptions of the roadways and existing transit service provided in the project vicinity are provided beginning on Page 295 of the Draft MEIR. The Draft MEIR also includes exhibits that show traffic volumes associated with each analysis scenario. The list of exhibits is provided in the Exhibits section at the beginning of the Draft MEIR.

Therefore, a review of the Draft MEIR indicates that the traffic analysis prepared does include analysis of ADT, AM and PM peak-hour volumes, including “freeways, interchanges, intersections” as requested by the commenter. HOV facilities were not included in the comment letter provided by Caltrans on the NOP nor are they included in the guidelines (“Appendix B”) suggested by the commenter in the Draft MEIR response letter. However, no impacts on HOV facilities were identified in the traffic analysis prepared for the project.

The commenter has not specified an inadequacy with the analysis provided or the model used that would warrant revision of the existing traffic study or the use of HCM2000, as requested by the commenter. Future conditions, as shown beginning on Page 316 of the Draft MEIR include

existing + project + other projects + other growth as requested by the commenter. Therefore, no changes were made to the Draft MEIR.

COMMENT 8.6

4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments. That is, include: existing + project + other projects + other growth.

RESPONSE 8.6

The commenter is referred to **RESPONSE 8.5**.

COMMENT 8.7

5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
 - Description of Transportation Infrastructure Improvements
 - Financial Costs, Funding Sources and Financing
 - Sequence and Scheduling Consideration
 - Implementation Responsibilities, Controls, and Monitoring

Any mitigation involving transit, HOV, or TDM must be rigorously justified and its effects conservatively estimated. Improvements involving dedication of land or physical construction may be favorably considered.

RESPONSE 8.7

Discussion of the measures proposed to mitigate any potential traffic impacts was included in the Draft MEIR. The proposed traffic mitigation measures begin on Page 390 of the Draft MEIR. Included in the discussion of mitigation measures beginning on Page 390 is information regarding the funding of substantial infrastructure improvements such as the Mason Avenue Extension Project proposed. Table 91: Traffic Mitigation Requirements on Page 403 of the Draft MEIR provides detailed information regarding the sequencing of mitigation measures proposed to reduce potential traffic impacts resulting from the project. Section V of the Final MEIR provides all implementation and monitoring responsibilities.

The traffic analysis indicated that there are no direct or indirect impacts to transit or HOV facilities and therefore, no mitigation for these facilities was proposed. The proposed TDM mitigation was rigorously reviewed by LADOT prior to inclusion in the Draft MEIR. The preliminary TDM plan included in the Draft MEIR was reviewed and approved by LADOT.

COMMENT 8.8

6. Specification of developer's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the developer. The following ratio should be estimated: additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guidelines). That ratio would be the project equitable share responsibility.

We note for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth. Analytical methods such as select-link travel forecast modeling might be used.

RESPONSE 8.8

As indicated on Page 390 of the Draft MEIR, mitigation proposed to reduce potential traffic impacts of the project consists of providing a fair-share contribution to LADOT for the design and construction of the Mason Avenue Extension project. However, this is a contribution to a project-specific impact and the necessary mitigation. The amount of the contribution was determined by LADOT.

A review of "Appendix B" indicates that this method should be used when,

- “• A project has impacts that do not immediately warrant mitigation, but their cumulative effects are significant and will require mitigating in the future.
- A project has an immediate impact and the lead agency has assumed responsibility for addressing operational improvements.”

Neither of these circumstances exist for this project. Further, the calculations for determining a "fair share" per "Appendix B" requires the identification of a total cost for improvements to mitigate the forecasted traffic demand on the State highway facility. To date, no project mitigation other than the Mason Avenue Extension fits this criteria.

The commenter has not identified any inadequacy in the methodology utilized by LADOT. Therefore, no changes to the Draft MEIR are required.

COMMENT 8.9

The Department as commenting agency under CEQA has jurisdiction superceding that of MTA in identifying the freeway analysis needed for this project. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the CMP guide of 150 or more vehicle trips added before freeway analysis is needed. MTA's Congestions Management Program in acknowledging the Department's role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System. Therefore, State Route(s) mentioned in Iten #1 and its facilities need to be analyzed per the Department's Traffic Impact Study Guidelines.

We look forward to reviewing the traffic study. We expect to receive a copy from the State Clearinghouse when the DEIR is completed. However, to expedite the review process, and clarify any misunderstandings, you may send a copy in advance to the undersigned.

If you have any questions, please feel free to contact me at (213)897-4429 or Alan Lin the project coordinator at (213)897-8391 and refer to IGR/CEQA No. 030942AL.

Sincerely,
Stephen J. Buswell
IGR/CEQA Branch Chief

RESPONSE 8.9

Contrary to the assertion of the commenter, MTA did not identify the freeway analysis necessary for the project. The comment letter provided by Caltrans for the NOP indicated that "An analysis of ADT, AM and PM peak-hour volumes for both the existing and future (expected project build-out) conditions. ***This should include State Route 118***, affected ramps, street, crossroads, and controlling intersections." Therefore, the freeway systems analyzed and the requested analysis were taken directly from the suggestion of Caltrans during the NOP process. This information was utilized in preparing the traffic study for the project. The MTA and CMP analyses utilized in the traffic study are widely recognized and utilized exclusively by LADOT. As a result of the identification by Caltrans that State Route 118 needed to be included in the traffic analysis, this freeway and associated ramps were analyzed in the traffic study prepared for the project. The commenter is referred to *RESPONSE 8.1* and Page 387 of the Draft MEIR.

The commenter has not identified a specific concern or inadequacy with the analysis identified but rather suggests an alternative analysis method. Therefore, no further alternative analysis is warranted or required and no changes have been made to the Draft MEIR.

**STATE OF CALIFORNIA
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE**

COMMENT 9.1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 27, 2003, and the comments from the responding agency (is) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916)445-0613 if you have any questions regarding the environmental review process.

Sincerely,
Terry Roberts
Director, State Clearinghouse

RESPONSE 9.1

Comment acknowledged.

**PROPERTY OWNER
ARNOLD COLMAN**

COMMENT 10.1

I own property north of Prairie St. which the City of Los Angeles has proposed as an “Add Area” to be included in the Zone Change and Plan Amendment analysis in the Master Environmental Impact Report noted above.

Your letter (copy attached) states that it is the City’s proposed intention to demolish all the buildings north of Prairie St. within 500 feet bound by Corbin to the west and Shirley to the east.

RESPONSE 10.1

The letter referenced by the commenter is the *Notice of Completion and Availability of Draft Master Environmental Impact Report No. ENV-2002-1230-EIR* (NOA), published on September 11, 2003. The fourth paragraph of this notice states,

The proposed Project will include demolition of one- and two-story research and development buildings of approximately 326,500 square-feet at the Project site. Across the Add Area, approximately 42,000 square feet of industrial space, 30,000 square feet of warehouse space, 83,000 square feet of manufacturing space, 27,000 square feet of office space, 98,000 square feet of household storage, a tennis/skate park, and associated surface parking will be demolished....

A review of ***Section II. Project Description (Pages 76-78)*** of the Draft MEIR identifies that the Add Area was included only for environmental analysis purposes and that the applicant only has control of the 35 acres south of Prairie Street. Page 77 of the Draft MEIR states,

“Add Area

Pursuant to the request of the LADCP staff, fifteen properties located to the north of Prairie Street (“Add Area”) have been included in the analysis of potential environmental impacts. The Add Area is developed with light industrial and commercial uses. At the Add Area, the development scenarios include analysis of the Zone Change from MR2-1 and P-1 to C2-1 and a General Plan Amendment from Light Manufacturing to Community Commercial to coincide with the Zone Change and General Plan Amendment requested at the Project Site. The Add Area properties are not currently under the applicant’s control and each property has a separate owner. Due to the lack of coordinated control over the Add Area properties, the applicant has no control over the processing of applications for properties within the area. Application and initiation of project proposals can either be completed by the City of Los Angeles or the Add Area property owners.”

Page 77 of the Draft MEIR goes on to explain that no specific development plan is proposed for the Add Area and that the development scenarios, including demolition, have been identified to demonstrate the range of development options and are for environmental analysis purposes only.

Also, Page 76 of the Draft MEIR states, “ Potential impacts of the eight development scenarios were based on the worst-case scenario and, based on economic conditions at the time of development, may be less substantial than originally anticipated.”

Therefore, while it is understandable how, from the Notice of Availability, the commenter reached the conclusion that it is the City’s intention to demolish buildings in the Add Area, the Draft MEIR clearly conveys that it is not the City’s intent to demolish the buildings in the Add Area.

COMMENT 10.2

Is it the City’s intention to condemn all this property in the “Add Area” to accomplish this?

RESPONSE 10.2

Please see **RESPONSE 10.1**. As discussed, it is not the City’s intention to condemn the properties located within the Add Area. As stated on Page 77 of the Draft MEIR, the Add Area was included for environmental analysis purposes only. Also, Pages 79-80 of the Draft MEIR include a discussion of the intended use of the Draft MEIR and a list of potential actions and approvals proposed for the Project Site. Condemnation is not identified on that list.

COMMENT 10.3

Will there be a hearing specifically to address this proposed action in the “Add Area”?

RESPONSE 10.3

The commenter is referred to **RESPONSE 10.1**. The City Planning Commission (CPC) will hold a simultaneous hearing on the applicant’s proposed project and the Zone Change and General Plan Amendment suggested by LADCP for the Add Area. All property owners and occupants within a 500-foot radius of the Project Site will be notified of the hearing by mail. The CPC will listen to testimony. The CPC will then make a recommendation to the City Council to approve or deny the requests. If the Zone Change and General Plan Amendment in the Add Area are approved, LADCP recommends that the Add Area properties include a Qualified or “Q” condition to each property. As stated on Page 235 of the Draft MEIR, the Land Use impact will be mitigated to a less than significant level with the following mitigation measure:

37. When the use of this property formerly designated as “Light Manufacturing” is proposed to be discontinued, the proposed use shall be approved by the appropriate decision-maker through a procedure similar to a conditional use. The decision-maker shall determine that the proposed use is consistent with the objectives of the General Plan and is compatible with the land uses, zoning or other restrictions of adjacent and surrounding properties. (O, C, R)

COMMENT 10.4

Also, what is the reason the City Planning Department is creating the “Add Area”? I was under the impression the proposed project was limited to the 35 plus acres of the Litton property.

RESPONSE 10.4

The commenter is referred to **RESPONSES 10.1** and **10.3**. The proposed project is limited to the 35.5 acres of the Litton property, bounded by Prairie Street to the north, Corbin Avenue to the west, Nordhoff Street to the south, and Shirley Avenue to the east. As identified on Page 76 of the Draft MEIR, an application for the 35 acres south of Prairie street was filed on December 17, 2002 under City Planning Case CPC 2002-7295-PPR-BL. As previously stated, properties located within the Add Area were included in the Draft MEIR for planning and environmental analysis purposes only, as requested by LADCP.

COMMENT 10.5

I and other property owners and businesses that I have contacted are very concerned over the proposed demolition or zone change of our property.

Please respond to the questions raised.

RESPONSE 10.5

As discussed in **RESPONSES 10.1-10.4**, the City is not proposing demolition of properties, such as yours, located within the Add Area. Rather, the City has proposed to include the Add Area in the environmental analysis only so as to not create a “spot zone” of manufacturing surrounded by commercial uses. As stated in the Draft MEIR, the Add Area properties are currently surrounded on three sides by commercially designated and utilized properties. To the south of the Project Site, all properties are commercially designated and utilized. If the requested Zone Change and General Plan Amendment is approved for the Project Site, the Add Area properties would be surrounded on *all* sides by commercially designated and utilized land uses and would be the only industrial land east of Corbin Avenue. This circumstance was perceived by the Department of City Planning as an area that needed to be further analyzed. For good zoning practices, the Draft MEIR was required to analyze the potential impacts of the Department of City Planning’s proposal to include the Add Area properties.

**REPRESENTATIVE FOR PROPERTY OWNER
KEVIN K. McDONNELL FOR JEFFER, MANGELS, BUTLER & MARMARO LLP**

COMMENT 11.1

This office represents Lainer Investments, owners of industrially zoned and used property within the “Add Area” included in the Draft Master Environmental Impact Report (“DMEIR”). The purpose of this letter is to voice particular objections to the inclusion of the “Add Area” north of Prairie Street between Corbin and Shirley along with pointing out deficiencies in the DMEIR with respect to this added property.

RESPONSE 11.1

Comment acknowledged.

COMMENT 11.2

The initial area of the application for a General Plan Amendment and Zone Change (“Project Area”) includes industrial property currently located in the MR2-1 Zone. The Project Description describes several development scenarios for the Project Area including various arrangements of office, retail, and senior housing. At the City Planning staff’s own initiative, the Add Area was included. No particular planning justification for including the Add Area is clearly articulated.

RESPONSE 11.2

The opinion of the commenter is acknowledged. The commenter is referred to *RESPONSES 11.3* and *11.5*.

As stated on Page 224 of Section IV. Environmental Impact Analysis, G. Land Use,

“Currently, the General Plan Amendment request area, which used to be an internal part of the Northridge Industrial Core, is surrounded on three sides by commercial development. Over time, the surrounding land uses have changed and now include retail to the north, retail to the east, and various commercial and retail uses to the south. Moreover, the approval of the Homeplace Retirement facility on the Project Site indicates that the City of Los Angeles may not oppose transition of this area from industrial to commercial. Uses currently within the Add Area such as the tennis facility, skate park, and public storage also indicate the change of land use in the immediate project vicinity. Therefore, the proposed change to the General Plan and corresponding Zone Change is consistent with trends in the community and will result in a less than significant impact to land use due to an inconsistency with the Community Plan.”

No where in the Draft MEIR is a Land Use impact identified if the Zone Change and General Plan Amendment are denied over the Add Area.

COMMENT 11.3

The application for the Project Area simply presents an “opportunity” to further reduce industrially-zoned property within the Chatsworth - Porter Ranch Community Plan Area.

RESPONSE 11.3

The opinion of the commenter is noted. The potential impact on industrially-zoned lands, both at the Project Site and Add Area, are identified in the Draft MEIR on Pages 222 - 235.

COMMENT 11.4

In the Summary section of the DMEIR, an attempt is made to rationalize further reducing industrially-zoned property in the area:

“The General Plan Amendment is requested because it will encourage consistency between the existing land use designation and the existing use of the property. Further, with coordination of land use designations and use for commercial purposes, the General Plan Amendment could encourage the conservation of other industrial lands in the Community Plan that are actually used for industrial purposes currently.”
DMEIR at p. 25.

Not only is the statement inaccurate factually (the Add Area is currently used for industrial purposes), the rationalization that eliminating vital industrial lands can, in some way, inspire conserving industrial lands in other areas of the Community Plan is, at best conjecture.

RESPONSE 11.4

As stated in the Draft MEIR on Pages 232 and 233, major portions of the Add Area properties are currently utilized for commercial purposes (skate park, tennis courts, clubhouse, office space, retail). Properties to the north, east, and west of the Add Area are currently utilized for commercial activities. As indicated in the Draft MEIR, properties to the south of the proposed Project Site (Litton property) are currently utilized for commercial purposes as well.

The argument that “eliminating vital industrial lands can, in some way, inspire conserving industrial lands in other areas” was not provided as the sole justification for the General Plan Amendment. Factual information and arguments were taken directly from the existing Community Plans, the General Plan of the City of Los Angeles, as well as Regional Plans for the area.

COMMENT 11.5

Further, to the extent actual redevelopment of the Add Area to uses conforming with the proposed new planning designation have not been studied (how could they be since no projects are pending?) [sic] The DMEIR is inadequate under the California Environmental Quality Act (“CEQA”).

RESPONSE 11.5

The potential redevelopment of the Add Area has been studied (See *RESPONSE 11.2*). Four potential redevelopment scenarios for the Add Area were analyzed in each environmental impact section of the Draft MEIR. Land Use issues regarding the redevelopment of the Add Area were identified in Section IV. Environmental Impact Analysis, G. Land Use, Pages 230-235.

Per Section 15175 of the CEQA Guidelines,

”The Master EIR procedure is an alternative to preparing a project EIR, staged EIR, or program EIR for certain projects which will form the basis for later decision making. It is intended to streamline the later environmental review of projects or approval included within the project, plan or program analyzed in the Master EIR. Accordingly, a Master EIR shall, to the greatest extent feasible, evaluate the cumulative impacts...on the environment of subsequent projects”

As allowed by the Master EIR process, as project applications are proposed in the Add Area, each project will undergo further environmental review. Each project application will be analyzed using the Project Area Initial Study prepared with the Draft MEIR (Section IX. Initial Study Checklist of the Draft MEIR). If the proposed projects are consistent with what has been analyzed for the Add Area in the Draft MEIR, then applicable mitigation measures outlined in the Draft MEIR will be utilized. If the proposed project differs from what was analyzed or exceeds what was analyzed, then a new Mitigated Negative Declaration (MND) or focused Environmental Impact Report (EIR) will be required. The comment did not identify which portions or sections of the Draft MEIR are inadequate under CEQA. Therefore, no corrections or additions have been made.

COMMENT 11.6

Further, placing an unreasonable burden on the owners of property within the Add Area to “undergo a procedure similar to a conditional use...” in the event the existing light industrial uses are to be discontinued, is not only unreasonable for the Add Area property owners, it unlawfully defers the review of future projects to some unknown date in the future by some undefined process. See proposed “Q” condition No. 37 at pp. 33 and 235 DMEIR.

RESPONSE 11.6

Including the Add Area properties in the environmental analysis of the Draft MEIR does not place undo burden on the property owners located within this area. If the owner of a property in the Add Area was to request a change from industrial designation to another land use independently of the circulated Draft MEIR, said owner would be required to undergo environmental review, as required by CEQA. As discussed in **RESPONSE 11.5**, the Master EIR process is intended to streamline the later environmental review of projects found to be consistent with development scenarios presented in the Draft MEIR. Therefore, property owners would undergo a potentially more expedient environmental review process under the Master EIR process than if they were to undergo an independent environmental review process.

The “Q” condition referenced on Pages 33 and 235 is included to ensure that all projects within the Add Area are required to undergo environmental and land use review process at the time redevelopment is proposed (as would be required if it were not included in the Draft MEIR environmental analysis). The details of this process will be determined by the City Planning Commission at the time of the public hearing.

COMMENT 11.7

Please enter these comments into the record and forward your responses to this office along with the schedule of pending public hearings.

Very truly yours,
Kevin K. McDonnell

RESPONSE 11.7

Comment acknowledged. You will be notified of the completion of the Final MEIR and future hearing dates. The Final MEIR will be available for review at the Planning Department’s website (<http://www.lacity.org/PLN/>) Hard copies will be available for review at the City Planning Department and the following Los Angeles Public Library Branches:

Porter Ranch Branch Library
11371 Tampa Avenue
Porter Ranch CA 91326

West Valley Regional Branch Library
19036 Vanowen Street
Reseda CA 91335

Central Library
630 W. Fifth Street
Los Angeles CA 90071

Mid-Valley Regional Branch Library
16244 Nordhoff Street
North Hills CA 91343

A cd-rom version can be purchased from the Planning Department for \$7.50.