



## Environmental Review Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



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# VOLUME 1 OF 2

## *RECIRCULATED PORTIONS OF DRAFT ENVIRONMENTAL IMPACT REPORT (RP-DEIR)*

SUNLAND – TUJUNGA – SHADOW HILLS – LAKE VIEW TERRACE – EAST LA TUNA  
CANYON COMMUNITY PLAN AREA

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## 6433 La Tuna Canyon Road Project

Case No. ENV-2007-3083-EIR

Council District No. 2

<p><b>THIS DOCUMENT COMPRISES THE FIRST PART OF THE ENVIRONMENTAL IMPACT REPORT (EIR) AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT. THE FINAL EIR WILL COMPRISE THE SECOND AND FINAL PART.</b></p>
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**Project Addresses:** 6433 La Tuna Canyon Road, Tujunga, CA

**Project History:** This Recirculated Portions of the Draft Environmental Impact Report (RP-DEIR) replaces two full sections of the Original Draft Environmental Impact Report (Original DEIR), which are Cultural Resources: Historic Resources and Transportation/Traffic, and adds Section III.A, Greenhouse Gasses. This RP-DEIR also expands on Original DEIR Section VI., Alternatives, to include two new alternatives to the Proposed Project. In response to public and private concerns with the Original DEIR, the applicant is recirculating this RP-DEIR pursuant to CEQA Guidelines Section 15088.5, Subdivision a(4) and (c), which requires the modified sections of an EIR to be circulated in certain circumstances.

**Project Description:** The Project proposes to subdivide and subsequently develop 229 homes on the 57.45-acre Project Site (approximately 3.93 units per acre). The development will be a private community with gated access and private roads. Lot sizes will range from 2,560 to 10,720 square feet in area. Lot widths will range from 32 feet to 40 feet: 84 lots will have a width of 32 feet, 80 lots will have a width of 35 feet, and 65 lots will have a width of 40 feet. The proposed homes will range in size from 1,800 to 2,700 square feet in building area and will have a maximum height of 30 feet (two-stories). Two basic models are proposed: 137 units will have four bedrooms while 92 will have five bedrooms. Each home will have a two-car garage. The proposed 229 homes will be built in two locations. Most of the homes (211 units) will be built in the southeast corner of the Project Site on the portion of the site currently occupied by the Verdugo Hills Golf Course. A further 18 homes will be built farther to the north, between the Verdugo Wash right-of-way on the west and Tujunga Canyon Road on the east.

**APPLICANT:**

Snowball West Investments, L.P./MWH Development

**PREPARED FOR:**

Los Angeles Department of City Planning

**PREPARED BY:**

CAJA Environmental Services, LLC

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December 2015

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## I. INTRODUCTION

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The City of Los Angeles (City), as the lead agency, prepared this document, entitled “Recirculated Portions of Draft Environmental Impact Report” (RP-DEIR), to analyze potential environmental impacts of the 6433 La Tuna Canyon Road Project (the “Proposed Project” or “Project”).<sup>1</sup> The applicant is Snowball West Investments, LP (the “Applicant”). The Proposed Project will require approval of certain discretionary actions by the City and other governmental agencies. Therefore, the Proposed Project is subject to environmental review requirements under the California Environmental Quality Act (CEQA).<sup>2</sup>

### A. PROJECT HISTORY

In 2009, the City initially reviewed the Proposed Project and prepared the applicable Draft Environmental Impact Report (“Original DEIR”). With that, and in compliance with Section 15082 of the CEQA Guidelines, a Notice of Preparation (NOP) for a Draft EIR was prepared by the Department of City Planning and distributed to the State Clearinghouse, Office of Planning and Research, responsible agencies and other interested parties on November 28, 2007. The NOP for the Original DEIR was circulated for 30 days, until December 28, 2007, and was subsequently extended to January 31, 2008. The Appendices attached to the Original DEIR contain a copy of the NOP and written responses to the NOP, respectively. The Original DEIR was released on May 21, 2009, and was available for review and comments until August 19, 2009. The Original DEIR is attached to this RP-DEIR as Appendix A. To note, a Final EIR was never prepared for the Proposed Project.

This RP-DEIR replaces two full sections of the Original DEIR, which are Cultural Resources: Historic Resources and Transportation/Traffic, and adds Section III.A, Greenhouse Gasses. This RP-DEIR also expands on Original DEIR Section VI., Alternatives, to include two new alternatives to the Proposed Project. In response to public and private concerns with the Original DEIR, the applicant is recirculating this RP-DEIR pursuant to CEQA Guidelines Section 15088.5, Subdivision a(4) and (c), which requires the modified sections of an EIR to be circulated in certain circumstances. The full Original DEIR is available at the City Planning Department, Room 750 City Hall, 200 North Spring Street, Los Angeles, California 90012, and will be included as Appendix A to this RP-DEIR.

### B. DOCUMENT PURPOSE

Under CEQA and the CEQA Guidelines, a lead agency must recirculate an EIR (or portions thereof) for additional public review and comment when “significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under [CEQA Guidelines] Section

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<sup>1</sup> Formerly titled “Verdugo Hills Golf Course Project”.

<sup>2</sup> Public Resources Code Sections 21000-21178.



15087 but before certification” of the EIR. “Significant new information” added to an EIR requires recirculation when that information discloses any of the following:

- (1) A new significant environmental impact would result from the project or from new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. CEQA Guidelines Section 15088.5(a) also indicates the term “information,” as used therein, may include

CEQA Guidelines Section 15088.5(c) provides that if revisions are limited to a few chapters or portions of an EIR, the lead agency need only recirculate the chapters or portions that have been modified. Accordingly, these recirculated portions of the Original DEIR has been prepared and includes new and/or revised analyses which supplement, and in some cases supersede, those previously provided in the Original DEIR. The impact analyses in the remainder of the Original DEIR concerning matters beyond those summarized below have not been re-examined in this document and remain valid.

In summary, the analyses of Historic Resources and Transportation/Traffic impacts presented in this RP-DEIR supersede, in their entirety, the corresponding sections of the Original DEIR. In the Original DEIR, these two sections have section identifiers that are not in alphabetical sequence as they were two of the environmental impact sections included in the Original DEIR. For example, and as noted below, the Cultural Resources – Historical Resources section was Section IV.E.1 of the Original DEIR, whereas, the Transportation/Traffic section was Section IV.N. In order to present the RP-DEIR in a format that facilitates its review by the public and decision makers, the sections have been assigned section identifiers that are now in alphabetical sequence.

Furthermore, the City’s Bureau of Sanitation (BOS) and its Watershed Protection Division recently prepared a report for the Project Site titled “Final Concept Report – Verdugo Hills Storm Water Project,” in March of 2012. The report is in response to the City’s Proposition O, which is a bond measure that funds potential areas and projects to help clean pollution in the City’s watercourses, beaches, and oceans. One of those potential project areas identified by the BOS is the Project Site. As a result, the BOS prepared a preliminary development plan for the Project Site, which encompassed acquiring 25-acres and adjacent hillside open space in order to maintain the Project Site as a golf course and public recreational facility with the Verdugo Hills Storm Water Project. With this, significant water-related infrastructure would be designed to improve overall water quality in and around the Project Site, but not necessarily

within the Project Site. Nevertheless, the Proposed Project will not be evaluating this report as an Alternative to the Project, as Guidelines Section 15126 states the following:

*“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. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation...”*

The Proposed Project does not include any of the above-mentioned proposed changes and is not currently participating with the City on any Proposition O development. Additionally, the proposed Verdugo Hills Storm Water Project does not meet the intent of a reasonable range of alternatives listed above, does not meet any of the basic objectives of the Proposed Project, is privately owned, and is clearly not a feasible alternative project to the Proposed Project.

In accordance with state mandates, the City has prepared and circulated this RP-DEIR pursuant to CEQA Guidelines Section 15088.5, Subdivision (g). This RP-DEIR contains the following new and expanded sections to be recirculated for public comment:

1. This Introduction section for the RP-DEIR, which includes a revised discussion of what is proposed under this RP-DEIR and the purpose for the RP-DEIR consistent with CEQA guidelines.
2. Executive Summary for the RP-DEIR, which includes a revised Summary of potential impacts, includes all cumulative impacts, if any.
3. Revised Environmental Impact Analysis discussion including the following:
  - a. New Greenhouse Gas Emissions section that discusses climate change and its potential impacts to the environment. This is a new section, which was not required at the time of the Original DEIR, but is now required in 2015;
  - b. Updated Cultural Resources (Historical Resources) section that acknowledges the cultural history of the Tuna Canyon Detention Station formerly located on the Project Site and the subsequent designation of a portion of the Site as a Historic-Cultural Monument. This section supersedes and replaces in full, Section IV.E.1., Cultural Resources, Historic Resources, of the Original DEIR;
  - c. Updated Transportation/Traffic section that includes an evaluation to determine whether the Traffic Study appended to the 2009 Draft EIR remains adequate. As discussed in the Traffic Study provided as Appendix E to this document, based on a review of traffic counts and an updated list of cumulative projects, the baseline conditions have changed

substantially enough since 2009 to cause a change in the results or conclusions of the original Traffic Study. This section supersedes and replaces in full, Section IV.N., Transportation, of the Original DEIR; and

- d. Expanded Alternatives section to the Proposed Project. Two newly proposed Alternatives are being presented under this RP-DEIR. This updated Alternatives section will not replace the original section, but will merely expand on the number of proposed Alternatives to the Proposed Project.

## **C. PROJECT SUMMARY**

As summarized below, the current project consists of the same general development proposal (i.e., the same land uses, floor areas, project elements, and features) as were originally described in Section II, Project Description, of the Original DEIR. Additionally, given the time that has passed since publication of the Original DEIR, the timing of project construction and buildout would change, but construction phasing and its duration would still consist of consecutive phases over the course of approximately one and a half years. Buildout is now anticipated in late 2017.

The Project proposes to subdivide and subsequently develop 229 homes on the 57.45-acre Project Site (approximately 3.93 units per acre). The development will be a private community with gated access and private roads. Lot sizes will range from 2,560 to 10,720 square feet in area. Lot widths will range from 32 feet to 40 feet: 84 lots will have a width of 32 feet, 80 lots will have a width of 35 feet, and 65 lots will have a width of 40 feet. The proposed homes will range in size from 1,800 to 2,700 square feet in building area and will have a maximum height of 30 feet (two-stories). Two basic models are proposed: 137 units will have four bedrooms while 92 will have five bedrooms. Each home will have a two-car garage.

The proposed 229 homes will be built in two locations. Most of the homes (211 units) will be built in the southeast corner of the Project Site on the portion of the site currently occupied by the Verdugo Hills Golf Course. A further 18 homes will be built farther to the north, between the Verdugo Wash right-of-way on the west and Tujunga Canyon Road on the east.

## **D. ENVIRONMENTAL REVIEW PROCESS**

A 45-day review period has been set for the RP-DEIR during which written comments on the scope and adequacy of this draft document can be submitted to the City Planning Department. All comments on the RP-DEIR should be sent to the following City contact: Erin Strellich, Department of City Planning, 200 North Spring Street, Room 750, Los Angeles, California 90012 by January 19, 2016. As CEQA Guidelines Section 15088.5, Subdivision (f)(2) permits, the City requests that reviewers limit the scope of their comments to that material which is within the text of the revised sections and the appendices included in the RP-DEIR. The City also requests that reviewers not make new comments on old matters

not included in this RP-DEIR. Following the 45-day public review period, the City will prepare responses to the written comments received during the recirculation period that relate to the revised and recirculated portions of this RP-DEIR, as well as written comments received during the initial circulation period that relate to the portions of the Original DEIR that have not been recirculated. and will compile the comments and responses into a Final EIR, which will consist of the following documents:

1. Original DEIR (without the sections that have been superseded and replaced by the corresponding sections in this RP-DEIR). The Notice of Preparation and comments are included as part of the Original DEIR;
2. RP-DEIR;
3. Comments and Responses to Comments on the RP-DEIR, received during the 45-day public comments period;
4. Comments and Responses to Comments on non-recirculated sections of the Original DEIR received during the original 45-day public comment period; and
5. Corrections or additions to the DEIR, if any.

The Final EIR will provide the basis for City decision-makers, such as the City Planning Commission and City Council to consider the environmental implications of the Proposed Project as well as possible ways to mitigate any potential significant environmental impacts. Prior to making a decision on the Proposed Project, the City must certify that the Final EIR has been completed in compliance with CEQA and was presented to the City's decision-making body, that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the Proposed Project, and that the Final EIR reflects the lead agency's independent judgment and analysis.

Finally, with regard to Sections I.C (Areas of Controversy), I.D (Issues to be Resolved), and I.E (Alternatives) of the Executive Summary in the Original DEIR, this RP-DEIR does not revise those sections and the reader is referred to the Original DEIR for the information contained in those sections.

### **Organization of RDEIR**

This RP-DEIR is organized into four sections as follows:

- I. Introduction: This section provides introductory information such as the project title, the project applicant, the lead agency for the Proposed Project, and the overall Environmental Review Process.
- II. Executive Summary: This section summarizes any new potential impacts and associated mitigation measures, if any.

- III. Environmental Impact Analysis: This section contains the revised environmental impact sections that directly supersede, or portions thereof, sections of the Original DEIR.
- IV. Alternatives: This section contains the two newly proposed alternatives to the Proposed Project. The alternatives proposed are in addition to the alternatives listed in the Original DEIR.
- V. Preparers of RP-DEIR and Persons Consulted: This section provides a list of lead agency personnel, consultants and other governmental agencies that participated in the preparation of the RP-DEIR.

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## II. EXECUTIVE SUMMARY

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### I. INTRODUCTION

As discussed in Section I, Introduction, of this RP-DEIR, certain analyses previously provided in the Original DEIR have been revised to address new regulatory requirements and/or disclose potential new or altered impacts. More detailed information regarding the Proposed Project and its potential environmental effects is provided in the following sections of this document. Specifically, Section III.A., Greenhouse Gas Emissions through Section III.D., Alternatives, of this document includes new and/or revised analyses which supplement and in some cases supersede those sections previously presented in the Original DEIR.

### II. SUMMARY OF PROJECT IMPACTS

The summary of environmental issues listed below replaces those subject areas of the Original DEIR Executive Summary. If the environmental issue area is not listed and discussed below, this RP-DEIR does not revise that topic. The letter sequence listed below corresponds to the lettering in this RP-DEIR only.

#### A. Greenhouse Gas Emissions (New Section)

Taking all of the factors set forth in Guidelines Section 15064.4(b) into account, the Proposed Project will be deemed to increase GHG emissions if it would be inconsistent with the ARB AB 32 Scoping Plan and other applicable guidance documents issued in furtherance of AB 32 to date, including the 2006 CAT Report, and the Attorney General's publication, *CEQA: Addressing Global Warming Impacts at the Local Agency Level*. By evaluating consistency with all of these documents, it can be determined whether the Proposed Project would achieve the emissions reductions that the Legislature has determined California must achieve.

As a result, since the Proposed Project would be consistent with the provisions of the AB 32 Scoping Plan, 2006 CAT Report and AG's Office Guidance, impacts of the Proposed Project with respect to GHGs and climate change would not conflict with the adopted state strategies for achieving reductions in GHG emissions to meet the requirements of AB 32 and would therefore be less than significant. Therefore, no significant impact would be anticipated under the Proposed Project.

#### B. Cultural Resources – Historic Resources (Previously Section IV.E.1 in the Original DEIR)

Since the initial preparation of the Original DEIR, the City of Los Angeles has taken steps to acknowledge the cultural history of the Tuna Canyon Detention Station formerly located on the project site. On October 12, 2012, a Motion was adopted by the Los Angeles City Council to initiate

consideration of the Tuna Canyon Detention Station site for designation as a Historic-Cultural Monument.

On June 25, 2013, the City Council adopted Motion 54A which, in part, declared a "...portion of the property located at 6433 West La Tuna Canyon Road with Coast Live Oaks and Sycamores, a Historic-Cultural Monument per Los Angeles Administrative Code Chapter 9, Division 22, Article 1, Section 22.171.7." Pursuant to Motion 54A, a Historic Tuna Canyon Detention Station Working Group was convened and instructed to report back to the City Council within 60 days.

As a result of the City Council's action, the designated portion of the site is subject to the provisions set forth in Los Angeles Municipal Code Section 22.171. The mitigation measures and impact analysis discussed and identified in the RP-DEIR section (and disclosed below) are not changed as a result of the City's action, but the section is provided and recirculated for public review in order to disclose the history of the Cultural Heritage Commission, PLUM, and City Council actions to date. For these reasons, no new impacts would occur to cultural resources as a result of the Proposed Project and impacts would be less than significant with mitigation.

### ***Mitigation Measures***

The following mitigation measure was initially recommended to reduce potential impacts associated with the Tuna Canyon Detention Station:

**E.1-1** "Because of the significance of events associated with the property, commemoration of the site through designation as a California Historical Landmark (CHL) in the thematic landmark group "Temporary Detention Camps for Japanese Americans," is recommended. Such an additional designation is not intended to preserve the present resources at Verdugo Hills Golf Course, but to commemorate associated events through interpretation at the site, to encourage sensitive development of the overall landscape, and to accommodate visitors to the site through ease of parking, observation, and meditation."

Since the preparation of the initial Draft EIR, a portion of the Proposed Project Site was designated a Historic-Cultural Monument in 2013 by the City of Los Angeles. The local designation goes further than the previously recommended mitigation measure in that it requires physical preservation of the monument with very limited exceptions. No permit for the demolition, substantial alteration or relocation of any Monument can be issued, and no Monument can be demolished, substantially altered or relocated without first referring the matter to the Commission, except where the Superintendent of Building or the City Engineer determines that demolition, relocation or substantial alteration of any Monument is immediately necessary in the interest of the public health, safety or general welfare.

(Please refer to Figure III.E-1 for an aerial photograph of the Project Site with the Working Group plan overlaid in in green and Figure III.E-2 for an illustration of the Proposed Project development site plan overlaid with the Working Group plan in green.)

In light of the Working Group recommendation, the following mitigation measures are recommended to reduce potential impacts:

- E.1-1** The Proposed Project shall comply with the Secretary of the Interior's Standards for Rehabilitation ("Standards") to ensure that future construction activities involving the HCM designated one-acre site are regulated in accordance with Section 22.171.14 of the City of Los Angeles Administrative Code ("LAAC"). The Applicant shall comply with the Cultural Heritage Commission's ("Commission") determination on the approval of a permit for the substantial alteration, or a permit for the demolition or removal, of a Monument in compliance with Subsections (a) and (b), respectively, of Section 22.171.14 of the LAAC. A qualified preservation consultant shall review the Proposed Project for conformance with the Standards and prepare a plan review commenting on the Proposed Project for submittal to the Commission for their review and approval. A qualified architectural historian, historical archaeologist or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Archaeology, or Architectural History pursuant to 36 CFR 61, shall prepare the plan review.
- E.1-2** The Proposed Project shall comply with Section 17.05R of the Los Angeles Municipal Code for Protected Trees to ensure no protected tree on the Project Site would be replaced or removed except as provided in Article 6 of Chapter IV of the Los Angeles Municipal Code. Further compliance with Section 17.05R requires review by the Advisory Agency, in consultation with the City's Chief Forester, to remove or relocate a protected tree and any tree officially designated a Historical Monument. A qualified preservation consultant who specializes in cultural landscapes shall review the Proposed Project for conformance with the Secretary of Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes and prepare a plan review commenting on the Proposed Project for submittal to the Commission for their review and approval.
- E.1-3** As a result of the City of Los Angeles Historic-Cultural Monument (HCM) designation of a portion of the Project Site, further commemoration of the historic use shall be accomplished with implementation of the September 10, 2013 Working Group recommended site plan, subject to City approval. Implementation of the commemoration set forth by the September 10, 2013 Working Group site plan would ensure the significant events associated with the former Tuna Canyon Detention Station are preserved. The implementation of this commemoration plan would result in adverse impacts to the HCM designated one-acre site; therefore, a qualified preservation consultant shall review the Proposed Project for conformance with the Standards and prepare a plan review commenting on the Proposed Project for submittal to the Commission for their review and approval in accordance with Section 22.171.14 of the LAAC.



### **C. Transportation/Traffic (Previously Section IV.N in the Original DEIR)**

As discussed in Section III-C., Transportation/Traffic, Scenario 3 (of the Traffic Impact Study presented in Appendix E), representing the worst case scenario, includes the construction of roughly 229 single-family dwelling units and does not assume any existing uses on the Project Site (and therefore no existing use trip credit). As presented in the section below, the Proposed Project is expected to generate a net increase of 124 vehicle trips (7 inbound trips and 117 outbound trips) during the AM peak hour. During the PM peak hour, the Proposed Project is expected to generate 141 net new vehicle trips (101 inbound trips and 40 outbound trips). Over a 24-hour period, Scenario 1, which represents the Proposed Project with credits given for the existing golf course and driving range, is forecast to generate a net increase of 1,155 daily trip ends (577 inbound trips and 578 outbound trips) during a typical weekday. Scenario 1 represents the most up to date and accurate baseline in which to derive potential impacts related to Project implementation.

The levels of service at the study intersections have been summarized in Appendix E, Table E1-2, to this RP-DEIR. As shown in column [4], under “Future with Project” conditions, no significant impacts are anticipated to occur under this scenario when compared to the Original DEIR conclusions. Thus, a less than significant impact would occur with implementation of the Proposed Project. Nevertheless, as disclosed in the Traffic Study and presented above as a PDF, the installation of a traffic signal is recommended at Intersection No. 4 (Tujunga Canyon Boulevard/Pali Avenue). Installation of a traffic signal at this location would further reduce the v/c ratio during the weekday PM peak hour by -0.202 from 1.265 (LOS F) to 1.063 (LOS F).

#### ***Mitigation Measures***

No mitigation measures are required to help reduce potential impacts to a less than significant level, as there are no potentially significant impacts associated with implementation of the Proposed Project.

#### **Project Requirements**

Although not required to mitigate any significant impacts, the Department of Transportation has added the following project requirements as conditions of approval for the Proposed Project:

- N-1 La Tuna Canyon Road:** Provide a 3-foot dedication along the entire project frontage on La Tuna Canyon Road to bring the total right-of-way and sidewalk to the Secondary Highway standard required by the General Plan.
- N-2 Tujunga Canyon Boulevard:** Provide a variable width dedication to complete a 52-foot half right-of-way and a variable width widening and improvement to complete a 10-foot half roadway and a 12-foot sidewalk along the entire Project frontage on Tujunga Canyon Boulevard.
- N-3 Closure of Golf Course/Driving Range:** The hypothetical project scenarios where either the golf course or driving range, or both, are closed will significantly impact the intersection of

Tujunga Canyon and La Tuna Canyon Road/Honolulu Avenue. Restriping the eastbound approach to provide one left turn lane, one shared left-right turn lane, and one right turn lane is required to mitigate the intersection to a less than significant level.

#### **D. Alternatives (Expansion of Section VI in the Original DEIR)**

This RP-DEIR adds two alternatives to the Proposed Project, as detailed below. This section does not revise the Original DEIR alternatives, but rather expands the analysis to include these two alternative design schemes.

##### ***Alternative V:***

Alternative 5 is an Equestrian Estates alternative provided to assess an alternative project that is compatible with the equestrian ambiance of La Tuna Canyon in keeping with the existing zoning for the property. Alternative 5 is an all residential development consisting of 86 equestrian estate lots. All lots would have a minimum lot area of 20,000 square feet and a minimum pad area of 11,000 square feet, large enough to accommodate a maximum of five (5) horses per lot. It would require the complete removal of the existing golf course and the driving range, as well as increase the overall amount of the site that would be devoted to development.

Proposed homes would have a maximum height of two stories (30 feet) in conformance with the Scenic Highway Corridors Viewshed Protection requirements of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan. As preliminarily designed, Alternative 5 would not connect to any existing equestrian trails. In addition, there would be no land made available for public dedication or public open space.

Overall, and as described in Section III.D.1, potential impacts associated with Alternative 5 would be generally greater than those identified for the Original DEIR.

##### ***Alternative VI:***

Alternative 6 is a lower density residential alternative which is being provided in response to comments asserting that the Original DEIR needed to assess an alternative project that reduced potential impacts disclosed in the Original DEIR. Alternative 6 would replace the existing golf course and driving range with a housing development and associated infrastructure and amenities, and also involve the potential public dedication of 28.4 acres of undeveloped land.

Alternative 6 is an all residential development consisting of 221 homes on the 57.45-acre Project Site. Lot sizes would range from 2,768 to 10,530 square feet in area. The proposed homes would range in size from 1,800 to 2,700 square feet in building area and have a maximum height of 30 feet (two-stories). Six basic models are proposed: 83 units would have four bedrooms while 138 would have three bedrooms. Each home would have a two-car garage.

The proposed 221 homes would be built in two locations. Most of the homes would be built in the southeast corner of the Project Site, on the portion of the property currently occupied by the Verdugo Hills Golf Course. Additional homes would be built farther to the north, between the Verdugo Wash right-of-way on the west and Tujunga Canyon Boulevard on the east. This smaller enclave would be accessed via a private street connecting to Tujunga Canyon Boulevard. The existing crossing of the Verdugo Wash would be used for pedestrian access to onsite open space, trails, and walkways.

Overall, potential impacts associated with Alternative 6 would be generally less than those impacts identified for the Proposed Project.

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### III. ENVIRONMENTAL IMPACT ANALYSIS

#### A. GREENHOUSE GAS EMISSIONS

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The Original DEIR did not address greenhouse gas emissions associated with the Proposed Project. Global climate change was not routinely analyzed prior to AB32, effective in 2007, and the CEQA Guidelines did not address greenhouse gases or global climate change at the time the Original DEIR for the Original Project was circulated. Subsequently, the Proposed Project (or Original Project) and associated RP-DEIR contain an analysis of potential greenhouse gas emissions (GHG).

#### ENVIRONMENTAL SETTING

The earth's natural warming process is known as the "greenhouse effect." The greenhouse effect likens the Earth and its surrounding atmosphere to a greenhouse with glass panes. The glass allows solar radiation (sunlight) into the Earth's atmosphere, but prevents radiative heat from escaping, thus, warming the Earth's atmosphere. Greenhouse gases (GHGs) keep the average surface temperature of the Earth close to a hospitable 60 degrees Fahrenheit. However, excessive concentrations of GHGs in the atmosphere can result in increased global mean temperatures, which generate adverse climatic and ecological consequences.

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (during motorized transport, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.) and deforestation, as well as agricultural activity and the decomposition of solid waste.

Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.<sup>1</sup> While the increase in temperature is known as "global warming," the resulting change in weather patterns is known as "global climate change." Global climate change is evidenced through changing wind patterns, storms, precipitation, and air temperature.

#### GHG Components

GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydro fluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride.<sup>2</sup> Carbon dioxide is the most abundant GHG, while less abundant other GHG's have higher global warming potential than CO<sub>2</sub>. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO<sub>2</sub>, denoted as CO<sub>2</sub>e.

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<sup>1</sup> *Climate Change 101: Understanding and Responding to Global Climate Change*, published by the Pew Center on Global Climate Change and the Pew Center on the States.

<sup>2</sup> *As defined by California AB 32AB 32 and SB104.*

Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. A general description of the GHGs discussed is provided in Table III.A-1, Description of Identified Greenhouse Gases.

**Table III.A-1**  
**Description of Identified Greenhouse Gases**

<b>Greenhouse Gas</b>	<b>General Description</b>
<b>Carbon Dioxide (CO<sub>2</sub>)</b>	An odorless, colorless GHG, which has both natural and anthropogenic sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of carbon dioxide are burning coal, oil, natural gas, and wood.
<b>Methane</b>	A flammable gas is the main component of natural gas. When one molecule of methane is burned in the presence of oxygen, one molecule of carbon dioxide and two molecules of water are released. A natural source of methane is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain methane, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
<b>Nitrous Oxide (N<sub>2</sub>O)</b>	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
<b>Hydrofluorocarbons (HFCs)</b>	HFCs are synthetic man-made chemicals that are used as a substitute for chlorofluorocarbons (CFCs) for automobile air conditioners and refrigerants. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987.
<b>Perfluorocarbons (PFCs)</b>	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above the earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.
<b>Sulfur Hexafluoride (SF<sub>6</sub>)</b>	An inorganic, odorless, colorless, non-toxic, and nonflammable gas. SF <sub>6</sub> is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.
<i>Source: Association of Environment Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007.</i>	

## Global Warming Potential

Global Warming Potentials (GWPs) are a simplified index that is based upon radiative properties that estimate potential future impacts of emissions by different gases on the climate system in a relative sense. GWP is based on a number of factors that include both the radiative efficiency (heat-absorbing ability) of each gas relative to that of carbon dioxide, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of carbon dioxide. A summary of the atmospheric lifetime and GWP of selected gases is presented at Table III.A-2. As indicated, GWP ranges from 1 to 23,900.

**Table III.A-2**  
**Atmospheric Lifetimes and Global Warming Potentials**

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100 year time horizon)
Carbon Dioxide	50 – 200	1
Methane	12 (+/-3)	21
Nitrous Oxide	120	310
HFC-23	264	11,700
HFC-134a	14.6	1,300
HFC-152a	1.5	140
PFC: Tetrafluoromethane (CF <sub>4</sub> )	50,000	6,500
PFC: Hexafluoroethane (C <sub>2</sub> F <sub>6</sub> )	10,000	9,200
Sulfur Hexafluoride (SF <sub>6</sub> )	3,200	23,900
<i>Source: IPCC, 2006.</i>		

## Projected Impacts of Global Warming in California

According to the 2006 California Climate Action Team (CAT) Report, temperature increases arising from increased GHG emissions could potentially result in a variety of impacts to the people, economy, and environment of California associated with a projected increase in extreme conditions. Severity of the impacts depends upon actual future emissions of GHGs and associated warming.

## California-Specific Adaptation Strategies

Because climate change already affects California and current emissions will continue to propel climate change in the coming decades, regardless of any mitigation measures that may be adopted, the necessity of adaptation to the impacts of climate change is recognized by the State of California. The 2009 California Climate Adaptation Strategy Discussion Draft begins a now ongoing process of adaptation, as directed by Gov. Schwarzenegger's Executive Order S-13-08. The goals of the approach are to analyze risks and vulnerabilities and identify strategies to reduce the risks. Once the strategies are identified and prioritized, government resources would be identified.

Climate change risks are evaluated using two distinct approaches: (1) projecting the amount of climate change that may occur using computer-based global climate models, and (2) assessing the natural or human system's ability to cope with and adapt to change by examining past experience with climate variability and extrapolating this to understand how the systems may respond to the additional impact of climate change. The major anticipated climate changes expected in the State of California include: increases in temperature; decreases in precipitation; particularly as snowfall; and increases in sea level, as discussed above.

### **Existing GHG Emissions in Project Vicinity**

GHG emissions are generated in the local vicinity of the Project site by stationary and area-wide sources, such as space and water heating, landscape maintenance by leaf blowers and lawn mowers, consumer products, and mobile sources, primarily automobile traffic. Overall, motor vehicles are the primary source of GHGs in the Project site vicinity. A key characteristic of the existing golf course is that it generates vehicle trips and traffic congestion for short periods during certain hours of the day.

### **Existing State-wide Greenhouse Gas Emissions**

The California Energy Commission (CEC) published the *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004* in December 2006. This report indicates that California emitted between 425 to 468 million metric tons of greenhouse gases in 1990. This seemingly large amount is a result of the large population residing in California. When considering fossil fuel emissions at the level of each individual person, California is second lowest in the nation in per capita CO<sub>2</sub> emissions, with only the District of Columbia being lower. Between 1990 and 2000, California's population grew by 4.1 million people and during the 1990 to 2003 period, California's gross state product grew by 83 percent (in dollars, not adjusted for inflation). However, California's greenhouse gas emissions were calculated to have grown by only 12 percent over the same period.

## **REGULATORY FRAMEWORK**

In response to growing scientific and political concern for global climate change, federal and state entities have adopted a series of laws to reduce emissions of GHGs into the atmosphere.

### **Federal**

#### ***U.S. EPA***

In the past, the U.S. EPA has not regulated GHGs under the Clean Air Act because it asserted that the Act did not authorize it to issue mandatory regulations to address global climate change. However, the U.S.

Supreme Court recently stated that the U.S. EPA must consider regulation of motor-vehicle GHG emissions.<sup>3</sup> The Court ruled that GHGs fit within the Clean Air Act's definition of a pollutant and that the U.S. EPA did not have a valid rationale for not regulating GHGs. In December 2009, the U.S. EPA issued an endangerment finding for GHGs under the Clean Air Act. This is the first step in regulating GHGs under the provisions of the Clean Air Act. In addition, on September 15, 2009, the National Highway Traffic Safety Administration and U.S. EPA announced a proposed joint rule that would explicitly tie fuel economy to GHG emissions reductions requirements. The proposed new Corporate Average Fuel Economy ("CAFE") Standards would cover automobiles for model years 2012 through 2016, and would require passenger cars and light trucks to meet a combined, per mile, carbon dioxide emissions level.

### ***Federal Action on Greenhouse Gas Emissions***

In 2002, President George W. Bush set a national policy goal of reducing the GHG emission intensity (tons of GHG emissions per million dollars of gross domestic product) of the US economy by 18 percent by 2012. However, no binding reductions were associated with the goal. Rather, the United States Environmental Protection Agency (USEPA) administers a variety of voluntary programs and partnerships with GHG emitters in which the USEPA partners with industries producing and utilizing synthetic GHGs to reduce emissions of these particularly potent GHGs.

### ***April 2007 Supreme Court Ruling***

In *Massachusetts et al. vs. Environmental Protection Agency et al.* (April 2, 2007), the US Supreme Court ruled that GHGs were air pollutants within the meaning of the Clean Air Act (CAA) and that the CAA authorized the USEPA to regulate CO<sub>2</sub> emissions from new motor vehicles, should those emissions endanger the public health or welfare. The Supreme Court did not mandate that the USEPA enact regulations to reduce GHG emissions, but found that the only instances where the USEPA could avoid taking action were if the agency found that GHGs do not contribute to climate change or if the USEPA offered a "reasonable explanation" for not determining that GHGs contribute to climate change. Upon the final decision, President Bush signed Executive Order 13432 on May 14, 2007, directing the EPA, along with the Departments of Transportation, Energy, and Agriculture, to initiate a regulatory process that responds to the Supreme Court's decision. While there currently are no adopted federal regulations for the control or reduction of greenhouse gas emissions, in 2009 the EPA considered several proposals that would be a prerequisite to implementing greenhouse gas emission standards. This EPA action did not impose any requirements on industry or other entities. However, the findings were a prerequisite to finalizing the greenhouse gas emission standards for light-duty vehicles mentioned below.

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<sup>3</sup> *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 (2007))



On April 1, 2010, the EPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a final joint rule to establish a national program consisting of new standards for model years 2012–2016 light-duty vehicles that will reduce greenhouse gas emissions and improve fuel economy. The EPA is finalizing the first-ever national greenhouse gas emissions standards under the CAA, and NHTSA is finalizing Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. The EPA greenhouse gas standards require these vehicles to meet an estimated combined average emissions level of 250 grams of CO<sub>2</sub> per mile in model year 2016, equivalent to 35.5 miles per gallon (mpg).<sup>4</sup>

## **State**

### ***Assembly Bill 1493***

In response to increased scientific and political concern for global climate change, California has adopted a series of laws to reduce emissions of GHGs into the atmosphere by commercial and private activities within the State. Signed in September 2002 by then-Governor Gray Davis, Assembly Bill (AB) 1493 requires the development and adoption of regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State.

### ***Executive Order S-3-05***

California Governor Arnold Schwarzenegger announced, on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; by 2050, reduce GHG emissions to 80 percent below 1990 levels. In response to the Executive Order, the Secretary of Cal/EPA created the CAT, which, in March 2006, published the CAT Report to Governor Schwarzenegger and the Legislature (the “2006 CAT Report”). The 2006 CAT Report identified a recommended list of strategies that the State could pursue to reduce climate change GHG emissions. These strategies could be implemented by various State agencies to ensure that targets are reached and can be carried out by existing authority of the State agencies.

### ***Assembly Bill 32 (California Global Warming Solutions Act)***

California's major initiative for reducing greenhouse gas emissions is outlined in Assembly Bill 32, the “Global Warming Solutions Act,” passed by the California State legislature on August 31, 2006. Assembly Bill 32 required CARB to:

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<sup>4</sup> United States Environmental Protection Agency. *EPA and NHTSA Finalize Historic National Program to Reduce Greenhouse Gases and Improve Fuel Economy for Cars and Trucks*. Available at: <http://www.epa.gov/otaq/climate/regulations/420f10014.htm>, last accessed February 2012.

- Establish a statewide greenhouse gas emissions cap for 2020, based on 1990 emissions, by January 1, 2008;
- Adopt mandatory reporting rules for significant sources of greenhouse gas emissions by January 1, 2008;
- Adopt an emissions reduction plan by January 1, 2009, indicating how emissions reductions will be achieved via regulations, market mechanisms, and other actions;
- Adopt regulations to achieve the maximum technologically feasible and cost-effective reductions of greenhouse gases by January 1, 2011; and
- Prepare a Scoping Plan outlining the State's strategy to achieve the 2020 greenhouse gas emissions limit.

The CARB has established that the level of annual greenhouse gas emissions in 1990 was 427 million metric tons of "CO<sub>2</sub> equivalence" (CO<sub>2</sub>e).<sup>5</sup> The term "Carbon Dioxide Equivalence" (CO<sub>2</sub>e) describes, for a given Greenhouse Gas, the amount of CO<sub>2</sub> that would have the same global warming potential, when measured over a specified timescale. The emissions target of 427 million metric tons of CO<sub>2</sub>e/year requires the reduction of 80 million metric tons from the State's projected "business-as-usual" 2020 emissions of 507 million metric tons<sup>6</sup> (i.e., the 1990 levels are approximately 28.4 percent below "business-as-usual"). "Business-as-usual" is a forecast of the California economy in 2020 without implementation of any of the greenhouse gas reduction measures identified in the Scoping Plan. The Scoping Plan was approved by CARB on December 11, 2008, and includes measures to address greenhouse gas emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures.<sup>7</sup> More specifically, the Scoping Plan includes aggressive energy efficiency goals and methods for increasing renewable energy use. As stated on page 27 of the 2008 Scoping Plan, CARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State's commitment to reduce greenhouse gas emissions by approximately 15 percent from current levels by 2020. Meeting the goals in the Scoping Plan will require expanded utility-based energy efficiency programs, more stringent building and appliance standards, green building practices, waste reduction, and

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<sup>5</sup> California Air Resources Board. *California 1990 Greenhouse Gas Emissions Level and 2020 Limit*. Available at: <http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm>, last accessed February 2012.

<sup>6</sup> California Air Resources Board. *Greenhouse Gas Inventory - 2020 Emissions Forecast*. Available at: <http://www.arb.ca.gov/cc/inventory/data/forecast.htm>, last accessed February 2012.

<sup>7</sup> California Air Resources Board. *December 2008. Climate Change Proposed Scoping Plan: a Framework for Change*. Available at: [http://www.arb.ca.gov/cc/scopingplan/document/adopted\\_scoping\\_plan.pdf](http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf), last accessed October 9, 2012.

innovative strategies that go beyond traditional approaches. The Scoping Plan also relies on expanded efforts by the California Energy Commission and California Public Utilities Commission.

In August 2011, the Scoping Plan was revised and reapproved by the CARB and includes the Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED).<sup>8</sup> The 2011 revisions to the Scoping Plan include a new “business-as-usual” benchmark of 507 million metric tons of CO<sub>2</sub>e/year in 2020 and revised emissions reduction requirements based on updated emissions projections in light of the economic downturn since 2008. The revised Scoping Plan indicates that California needs to reduce greenhouse gas emissions by approximately 16 percent below “business as usual” greenhouse gas emissions for year 2020 to attain the goal of 1990 emission levels, or 427 million metric tons of CO<sub>2</sub>e, by 2020. The Scoping Plan includes a range of greenhouse gas reduction actions that may include direct regulations, alternative compliance mechanisms, monetary and nonmonetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. It is important to note that the Scoping Plan, even after Board approval, remains a recommendation. The measures in the Scoping Plan will not be binding until after they are adopted through the normal rulemaking process. The CARB rule-making process includes preparation and release of each of the draft measures, public input through workshops, and a public comment period, followed by a CARB Board hearing and rule adoption.

In addition to reducing greenhouse gas emissions to 1990 levels by 2020, Assembly Bill 32 directed ARB and the Climate Action Team (CAT)<sup>9</sup> to identify a list of “discrete early action greenhouse gas reduction measures” that could be adopted and made enforceable by January 1, 2010.

#### ***Executive Order S-1-07 (California Low Carbon Fuel Standard)***

Executive Order S-1-07, the Low Carbon Fuel Standard (issued on January 18, 2007), requires a reduction of at least 10 percent in the carbon intensity of California’s transportation fuels by 2020. Regulatory proceedings and implementation of the Low Carbon Fuel Standard have been directed to CARB. The Low Carbon Fuel Standard has been identified by CARB as a discrete early action item in the Adopted Climate Change Scoping Plan. CARB expects the Low Carbon Fuel Standard to achieve the minimum 10 percent reduction goal; however, many of the early action items outlined in the Climate Change Scoping Plan work in tandem with one another. To avoid the potential for double-counting emission reductions associated with AB 1493, the Climate Change Scoping Plan has modified the aggregate reduction expected from the Low Carbon Fuel Standard to 9.1 percent.

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<sup>8</sup> California Air Resources Board. August 2011. *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document*. Available at: [http://www.arb.ca.gov/cc/scopingplan/document/final\\_supplement\\_to\\_sp\\_fed.pdf](http://www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf), last accessed October 9, 2012.

<sup>9</sup> CAT is a consortium of representatives from State agencies who have been charged with coordinating and implementing GHG emission reduction programs that fall outside of CARB’s jurisdiction.

**Senate Bill 97**

In August 2007, the Legislature adopted Senate Bill 97 (SB 97), which requires the Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. Following receipt of these guidelines, the Resources Agency certified and adopted the guidelines prepared by OPR by January 1, 2010. The Natural Resources Agency undertook the formal rulemaking process to certify and adopt the amendments as part of the state regulations implementing CEQA. The CEQA Guidelines Amendments became effective on March 18, 2010.

In the CEQA Guideline Amendments, a threshold of significance for greenhouse gas emissions was not specified, nor does it prescribe assessment methodologies or specific mitigation measures. Instead, the amendments encourage lead agencies to consider many factors in performing a CEQA analysis, but rely on the lead agencies in making their own significance threshold determinations based upon substantial evidence. The CEQA amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

**Senate Bill 375**

There has also been California legislative activity acknowledging the relationship between land use planning and transportation sector GHG emissions. Senate Bill 375, signed into law on October 1, 2008, is intended to enhance CARB's ability to reach Assembly Bill 32 goals by directing CARB to develop regional greenhouse gas emission reduction targets to be achieved within the automobile and light truck sectors for 2020 and 2035. The targets are required to consider the emission reductions associated with vehicle emission standards (see Senate Bill 1493), the composition of fuels (see Executive Order S-1-07), and other CARB-approved measures to reduce greenhouse gas emissions. In late September 2010, the CARB announced greenhouse gas reduction goals for implementation by regional land use and transportation agencies. As shown below in Table III.A-3, the regional emissions reduction goal for Los Angeles/Southern California is eight percent by 2020 and 13 percent by 2035 compared to 2005 emissions levels.

**Table III.A-3**  
**September 2010 CARB SB 375 REDUCTION GOALS**

Region	By 2020 (Percent)	By 2035 (Percent)
San Francisco Bay Area	7	15
San Diego	7	13
Sacramento	7	16
Central Valley/San Joaquin	5	10
Los Angeles/Southern California	8	13
<i>Source: California Air Resources Board 2010.</i>		

CARB will work with California's 18 metropolitan planning organizations to align their regional transportation, housing, and land use plans and prepare a "Sustainable Communities Strategy" within the Regional Transportation Plan to reduce the number of vehicle miles traveled in their respective regions and demonstrate the region's ability to attain its greenhouse gas reduction targets. If a Sustainable Communities Strategy is unable to achieve the greenhouse gas reduction target, a metropolitan planning organization must prepare an Alternative Planning Strategy demonstrating how the greenhouse gas reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. Senate Bill 375 provides incentives for streamlining State CEQA Guideline requirements by substantially reducing the requirements for "transit priority projects," as specified in Senate Bill 375, and eliminating the analysis of the impacts of certain residential projects on global warming and the growth-inducing impacts of those projects when the projects are consistent with the Sustainable Communities Strategy or Alternative Planning Strategy.

### ***California Green Building Code***

The California Green Buildings Standards Code (Cal Green Code) (California Code of Regulations [CCR], Title 24, part 11) was adopted by the California Building Standards Commission in 2010 and became effective in January 2011. The Code applies to all new constructed residential, nonresidential, commercial, mixed-use, and State-owned facilities, as well as schools and hospitals. The Cal Green Code is comprised of Mandatory Residential and Nonresidential Measures and more stringent Voluntary Measures (Tiers I and II).

Mandatory Measures are required to be implemented on all new construction projects and consist of a wide array of green measures concerning project site design, water use reduction, improvement of indoor air quality, and conservation of materials and resources. The Cal Green Building Code refers to Title 24, Part 6 compliance with respect to energy efficiency; however, it encourages 15 percent energy use reduction over that required in Part 6. Voluntary Measures are optional, more stringent measures that may to be used by jurisdictions that strive to enhance their commitment towards green and sustainable design and achievement of Assembly Bill 32 goals. For instance, under TIERS I and II, all new construction projects are required to reduce energy consumption by 15 percent and 30 percent, respectively, below the baseline required under the California Energy Commission (CEC), as well as implement more stringent green measures than those required by mandatory code.

### **Regional**

#### ***South Coast Air Quality Management District (SCAQMD)***

On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold for projects where SCAQMD is the lead agency. Currently, the Board has only adopted thresholds relevant to industrial (stationary source) projects. To achieve a policy objective of capturing 90 percent of GHG emissions from new residential/commercial development projects and implement a "fair share" approach to reducing emission increases from each sector, SCAQMD staff has proposed combining performance standards and screening thresholds. The performance standards

suggested have primarily focused on energy efficiency measures beyond Title 24 Part 6, California's building energy efficiency standards, and a screening level of 3,000 tonnes CO<sub>2</sub>e per year based on direct operational emissions. Above this screening level, project design features designed to reduce GHGs must be implemented to reduce the impact to below a level of significance.

### ***Southern California Association of Governments (SCAG)***

The Project site is located within the boundaries of the Southern California Association of Government, the designated Metropolitan Planning Organization. SCAG has proposed regional greenhouse gas emissions targets as required under Senate Bill 375. As shown in the discussion above on Senate Bill 375, the regional greenhouse gas reduction targets proposed by SCAG include an eight percent reduction by the year 2020 and a 13 percent reduction for the year 2035 as compared to year 2005 emissions. These reduction goals were incorporated in the 2012 Regional Transportation Plan. Projects going through the State CEQA Guidelines process are required to demonstrate consistency with SCAG Regional Transportation Plan policies and the Sustainable Communities Strategy (SCS) plan to meet emission reduction targets. One goal of the Sustainable Communities Strategy plan is compliance with the provisions of Senate Bill 375 by establishing a reduction target for cars and light trucks.

### **Local**

#### ***City of Los Angeles - Green LA Action Plan***

The City of Los Angeles has begun to address the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan). This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, the City of Los Angeles is committed to the goal of reducing emissions of CO<sub>2</sub> to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

#### ***City of Los Angeles Green Building Ordinances***

On April 22, 2008 the Los Angeles City Council approved Ordinance No. 179,820 (the Green Building Ordinance). The goal of the Green Building Ordinance is to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional and global ecosystems. To achieve these goals, it must be demonstrated that certain projects in the City meet the intent of the criteria for certification at the Leadership in Energy and Environmental Design (LEED) certified level. Effective December 27, 2010, this ordinance was repealed and replaced with a new Green Building Ordinance (Ordinance No. 181,480) that adheres to the state Green Building Code rather than LEED.

## EXISTING AIR QUALITY

The information below is provided based on a technical analysis performed by DKA Planning. The technical model runs are attached to this RP-DEIR as Appendix B, Original Project GHG Model Runs.

### *Existing GHG Emissions Inventory*

In December 2006, the California Energy Commission prepared an inventory of GHG emissions for the State.<sup>10</sup> It includes a projected inventory of 542 million metric tons of CO<sub>2</sub>e in 2010 and 610 million metric tons in 2020.

### Existing Site Emissions

The Proposed Project site is an existing golf course that generates GHG emissions from fuel combustion associated with waste processes, water conveyance, and mobile sources. Table III.A-4 summarizes existing GHG emissions from the three sites that comprise the Proposed Project.

**Table III.A-4**  
**Existing Greenhouse Gas Emissions from Project Site (tons/year)**

Category	Bio-CO <sub>2</sub>	NBio-CO <sub>2</sub>	Methane (CH <sub>4</sub> )	Nitrous Oxide (N <sub>2</sub> O)	Carbon Dioxide Equivalent (CO <sub>2</sub> e)
Waste	6	0	0	0	13
Water	0	221	0	0	222
Mobile	0	1,319	0	0	1,320
Total	6	1,540	0	0	1,555
<i>Source: DKA Planning 2014 based on CalEEMod analysis.</i>					

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

Until the passage of Assembly Bill 32, CEQA documents such as the 2006 EIR generally did not evaluate greenhouse gas emissions or impacts on global climate change. The primary focus of air pollutant analysis in CEQA documents was the emission of criteria pollutants, or those identified in the State and Federal Clean Air Acts as being of most concern to the public and government agencies. With the

<sup>10</sup> California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004*; CEC-600-2006-013-SF (December 2006).

passage of Assembly Bill 32, a more detailed analysis of greenhouse gas emissions is recommended in CEQA documents. However, the analysis of greenhouse gases is different from the analysis of criteria pollutants. Since the half-life of CO<sub>2</sub> is approximately 100 years, greenhouse gases affect the global climate over a relatively long timeframe. Conversely, for criteria pollutants, significance thresholds/impacts are based on daily emissions; and the determination of attainment or nonattainment are based on the daily exceedance of applicable ambient air quality standards (e.g., 1-hour and 8-hour exposures).

In its January 2008, California Environmental Quality Act and Climate Change white paper, the California Air Pollution Control Officers Association (CAPCOA) identified a number of potential approaches for determining the significance of greenhouse gas emissions in CEQA documents. In its white paper, CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by the lead agency. One of the potential approaches identified in the CAPCOA White Paper, Threshold 1.1, would require a project to meet a percent reduction target. This target would be based on the average reduction from “business-as-usual” emissions identified by the CARB as necessary to satisfy Assembly Bill 32’s mandate of returning to 1990 levels of greenhouse gas emissions by 2020. The CARB calculated the necessary statewide reduction to be approximately 28.4 percent from “business-as-usual.” In the 2008 Scoping Plan, CARB encouraged local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State’s commitment to reduce greenhouse gas emissions by approximately 15 percent from current levels by 2020.

To assist public agencies in analyzing the effects of greenhouse gases under the State CEQA Guidelines, Senate Bill (Senate Bill) 97 (Chapter 185, 2007) required the Governor’s Office of Planning and Research to develop State CEQA Guidelines on how to minimize and mitigate a project’s greenhouse gas emissions. On December 30, 2009, the Natural Resources Agency adopted State CEQA Guideline Amendments related to climate change. These amendments became effective in March 2010. Notably, the amendments do not establish a threshold of significance; instead, lead agencies are called on to establish significance thresholds for their respective jurisdictions. The State CEQA Guideline Amendments also clarify “that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of State CEQA Guideline’s requirements for cumulative impact analysis.”<sup>11</sup>

Appendix G of the State CEQA Guidelines provides sample checklist questions for use in an Initial Study to determine a project’s potential for environmental impact. These checklist questions include the following:

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<sup>11</sup> Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources (April 13, 2009).



- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?
- Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The State CEQA Guidelines leave the determination of significance to the reasonable discretion of the lead agency and encourage lead agencies to develop and publish thresholds of significance for use in determining the significance of environmental effects in CEQA documents. However, neither SCAQMD nor the City of Los Angeles has yet established specific quantitative significance thresholds for greenhouse gas emissions for residential or commercial projects.<sup>12</sup>

Additionally, due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is speculative to identify the specific impact, if any, to global climate change from one project's incremental increase in global greenhouse gas emissions. As such, a project's greenhouse gas emissions and the resulting significance of potential impacts are more properly assessed on a cumulative basis. Assessing the significance of a project's contribution to cumulative global climate change involves: (1) determining an inventory of project greenhouse gas emissions; and (2) considering project consistency with applicable emission reduction strategies and goals such as those set forth by Assembly Bill 32.

As discussed in Sections 4.5.2 and 4.5.4, Assembly Bill 32 established greenhouse gas reduction targets for statewide emissions at 28.4 percent in 2008, and encouraged local governments to adopt a reduction goal for municipal operations emissions and community emissions of 15 percent from current levels by 2020. In the 2011 Scoping Plan, the statewide emissions reduction goal was revised to 16 percent. SCAG has proposed draft reduction targets specific to land use decisions at much lower levels, approximately 8–13 percent below “business-as-usual” emissions. Therefore, demonstrating consistency with the more aggressive Assembly Bill 32 statewide targets is considered to be conservative. Based on the foregoing, a Proposed Project would have a significant impact if:

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<sup>12</sup> The SCAQMD formed a GHG Significance Threshold Working Group. More information on this Working Group is available at <http://www.aqmd.gov/ceqa/handbook/GHG/GHG.html>. On December 17, 2009, the San Joaquin Valley Air Pollution Control District adopted a greenhouse gas significance threshold guidance document, “Addressing Greenhouse Gas Emissions Impacts Under the California Environmental Quality Act” (available at [http://www.valleyair.org/Programs/CCAP/CCAP\\_idx.htm](http://www.valleyair.org/Programs/CCAP/CCAP_idx.htm)). Notably, the guidance document: (1) does not limit a lead agency's authority in establishing its own process and guidance for determining significance of project related impacts on global climate change; and (2) acknowledges that a lead agency can determine that a project would have a less than cumulatively significant impact if it can be demonstrated that the project will achieve a 29 percent reduction from business-as-usual greenhouse gas emissions.

- Project-wide emissions reduction does not constitute an equivalent or larger break from “business-as-usual” than has been determined by the CARB to be necessary to meet the State Assembly Bill 32 goals (approximately 15 percent for community emissions).

## **Methodology**

Given the global nature of GHG impacts, it is challenging to accurately determine which emissions from a given project are “new” on a global scale. The goal of estimating emissions of criteria pollutants from projects is to understand whether there are significant new emissions in California’s air basins, which have a limited ability to absorb additional criteria pollutants, the impacts of GHG emissions are a function of their global concentrations, rather than local concentrations. For the Proposed Project, trips associated with residential growth are conservatively treated as new. This can result in an overestimation of the “new” emissions associated with the Proposed Project.

Nevertheless, the methodology utilized for the following analysis is based on a Technical Advisory released by the Governor’s Office of Planning and Research (OPR) on June 19, 2008 titled CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review. This analysis provides the following greenhouse gas emissions estimates: (1) GHG emissions from the existing golf course, (2) “business-as-usual” GHG emissions for the Proposed Project; and (3) GHG emissions “as proposed” for the Proposed Project. The “as proposed” case evaluates relative emissions reductions associated with project design features and compliance with all applicable State regulations concerning the reduction of greenhouse gas emissions, including Title 24, as updated by the California Green Building Standards Code, which became effective in January 2011. The “business-as-usual” inventory provides a measure of baseline emissions for a similar project that lacks Proposed Project design features, but which meets the minimum performance level for new building construction required under Title 24 (2005) (i.e., prior to the updates to Title 24 that include the California Green Buildings Standards Code).

## **Emissions Factors**

Project emissions have been quantified using the SCAQMD CalEEMod model, Version 2011.1.1. Greenhouse gas emissions were estimated separately for the following categories of land use or energy end use:

- Building operations
- Infrastructure
- Water use
- Solid waste
- Transportation
- Construction

***Consistency with Assembly Bill 32***

This section utilizes the break from the “business-as-usual” method to determine consistency with Assembly Bill 32. This approach mirrors concepts used in the CARB’s Climate Change Scoping Plan for the implementation of Assembly Bill 32. The CARB Climate Change Scoping Plan and guidance from a wide variety of state agencies has emphasized that achieving the State’s greenhouse gas emissions reduction goals requires a substantial change from “business-as-usual.” Comparing a project’s emissions to “business-as-usual” emissions is fundamental to the CARB’s calculation that achieving Assembly Bill 32 mandates a 16 percent reduction in emissions from “business-as-usual.” However, the notion of statewide “business-as-usual” used in the CARB’s Climate Change Scoping Plan is not directly applicable at local or regional scales. The statewide “business-as-usual” is based on historic trends across entire economic sectors – not the activity of local governments or individual projects (i.e., it is a top-down estimate of anticipated future emissions). Consequently, evaluating the proposition that a project constitutes a break from “business-as-usual” requires providing a quantitative estimate of “business-as-usual” based on the specific circumstances of the Proposed Project in the context of relevant State activities and mandates. This essentially requires two greenhouse gas emissions inventories (as follows):

1. “Business-as-Usual” Without State Mandates. The “business-as-usual” scenario provides a basis for evaluating the performance of the Proposed Project to the existing setting. It is useful to consider the performance of a project with respect to both “business-as-usual” and anticipated future regulatory conditions. Consideration of the Proposed Project’s performance under “business-as-usual” regulatory conditions provides a conservative upper boundary on Project emissions, as future regulatory action is expected to result in a range of infrastructure changes that will reduce emissions over time. The analysis below establishes “business-as-usual” for the Proposed Project as to the energy and the emissions associated with construction of new buildings to the minimum performance level required under Title 24 (2005) (i.e., prior to the updates to Title 24 that include the California Green Buildings Standards Code, which became effective in January 2011).
2. “As Proposed” Project with 2020 Mandates. While the Proposed Project is expected to begin operations in November 2018, Assembly Bill 32 has not established a greenhouse gas reduction goal for 2018. Because the analysis of climate impacts is by nature a long-term cumulative analysis and 2020 is a well-defined point in time in terms of regulatory status and the long-term CARB and SCAG planning horizon, emission calculations were based on the 2020 time frame. The “as proposed” conditions reflect full implementation of the 33 percent Renewables Portfolio Standard for the Los Angeles Department of Water and Power, the California Low Carbon Fuel Standard, and the tailpipe standards in California State Assembly Bill 1493 (Pavley). These assumptions are conservative since there are a variety of more stringent targets and goals that will further reduce greenhouse gas emissions.

## Compliance Measures

Several emission reduction measures are required under the City's Green Building Ordinance, including the following (measures that are quantified in the GHG analysis are highlighted in *italics*):

### *Energy*

- The Applicant or its successor shall meet the 2008 Standards for Title 24 Part 6 energy efficiency standards.
- Installed cooling equipment shall have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio (EER) of at least 11.5.
- Installed tank type water heaters shall have an Energy Factor (EF) higher than .60, and installed tankless water heaters shall have an EF higher than .80.
- The Applicant or its successor shall use energy efficient pumps and motors for waste/storm water conveyance, firewater, domestic pools, and spas.
- *Building lighting in the kitchen and bathrooms within the dwelling units shall consist of at least 90 percent ENERGY STAR<sup>®</sup> qualified hard-wired fixtures.*
- *The Applicant or its successor shall use ENERGY STAR<sup>®</sup> rated appliances in the residential dwelling units.*

### *Water*

- A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the residential units by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:
  - *Each plumbing fixture and fitting shall meet reduced flow rates specified in Table 4.303.2; or*
  - *A calculation demonstrating a 20 percent reduction in the building "water use" baseline as established in Table 4.303.1 of the LA Green Code shall be provided. The calculation shall be limited to the following plumbing fixture and fitting types: water closets, urinals, lavatory faucets, kitchen faucets and showerheads.*
- *Irrigation controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change.*

- *Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input.*

#### **Area Sources**

- *Wood burning fireplaces and stoves shall be prohibited within the Project in compliance with AQMD Rule 445.*

#### **Solid Waste**

- *The Applicant or its successor shall set a solid waste diversion target of 65 percent for operational waste;<sup>13</sup>*
- *The Applicant or its successor shall establish a construction waste diversion program to divert up to 75 percent of construction related waste;<sup>14</sup> and*
- *The Applicant or its successor shall provide recycling centers in readily accessible areas within buildings for depositing, storage, and collection of non-hazardous materials for recycling.*

#### **Mobile Sources**

- *The Applicant or its successor shall provide a minimum of one 208/240 V 40 amp, grounded AC outlet for each dwelling unit, or panel capacity and conduit for the future installation of a 208/240 V 40 amp, grounded AC outlet for each dwelling unit. The electrical outlet or conduit termination shall be located adjacent to the parking area.*

#### **Project Design Features<sup>15</sup>**

The GHG analysis includes the following voluntary Project Design Features that factor into the estimates of Project-related GHG emissions.

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<sup>13</sup> *This recommended mitigation measure is a best practices strategy will reduce a small amount of GHG emissions during operations. If the project is unable to assure these reductions over time, the project would still comply with the 15 percent reduction over BAU.*

<sup>14</sup> *The estimated waste diversion rate for demolition waste was provided by Turner Construction Company, July 31, 2009, p. 71.*

<sup>15</sup> *These proposed emission reduction measures are voluntarily proposed by the Project Applicant.*

**Energy**

- *The Applicant or its successor shall use at least 20 percent green power. The 20 percent usage shall be achieved through a combination of LADWP's RPS commitment and the Project's participation in LADWP's Green Power Program.*

**Mobile Sources**

- *Pedestrian-friendly environment (walkable village);*
- *Bicycle amenities, such as bicycle racks, lockers, etc.;*
- *Rideshare/carpool/vanpool promotion and support;*
- *Education and information on alternative transportation modes;*
- *Transportation Information Center (TIC); and*
- *Transportation Management Coordination Program.*

**Project Design Features Whose Emissions Were Not Incorporated into the Analysis but Would Yield Further GHG Emissions Savings**

There are also a number of project design features that will be included that would result in further reductions in GHG emissions from the Proposed Project, but that cannot be quantified at this time. In the case of the built environment, a combination of some of these project design features, while not individually quantified, may be incorporated to meet the 15 percent reduction over 2005 Title 24 and comply with 2008 Title 24 to which the Project has committed.

- *Install Energy Monitoring Dashboards to provide real-time and historical feedback to residents on their homes' energy consumption;*
- *Install light colored cool roofs;*
- *Provide education on energy efficiency, water conservation, and waste recycling services;*
- *For mechanically or naturally ventilated spaces in the building, meet the minimum requirements of Section 121 of the California Energy Code or the applicable local code, whichever is more stringent; and*
- *Install MERV 6 or higher rated filters on central air and heating systems*

**Project Impacts****Construction Phase**

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. These impacts would vary day to day over the 41-month duration of construction activities.

As illustrated in Table III.A-5, construction emissions of CO<sub>2</sub>e would total 6,869 metric tons over the duration of construction. Mitigated emissions are expected to be identical, since construction mitigations are largely targeted at reducing fugitive dust from construction activities. These best practices methods of increasing moisture content in construction site dust and related measures do not reduce emissions of GHG.

**Table III.A-5**  
**Estimated Total Construction Emissions – Unmitigated and Mitigated (CO<sub>2</sub>e Metric Tons)**

<b>Year</b>	<b>Unmitigated CO<sub>2</sub>e Emissions</b>	<b>Mitigated CO<sub>2</sub>e Emissions</b>
2015	655	655
2016	2,987	2,987
2017	1,958	1,958
2018	1,269	1,269
<b>Total Emissions</b>	<b>6,869</b>	<b>6,869</b>

### **Operational Phase**

Greenhouse gas emissions were calculated for area source, energy, mobile vehicle, waste, and water operations. As shown in Table III.A-6, the Proposed Project would result in 4,983 metric tons of CO<sub>2</sub>e per year prior to application of mitigation measures that would reduce emissions beyond a “Business as Usual” scenario. This represents a 23 percent reduction over BAU conditions and demonstrates reductions in excess of this analysis’ goal of 15 percent reductions over BAU. It should be noted that this does not include existing mobile source-related GHG emissions associated with the golf course--approximately 1,555 annual metric tons of CO<sub>2</sub>e emissions (Table III.D-4 above) that would be removed with development of the Proposed Project and should be considered a conservative estimate as such.

**Table III.A-6**  
**Estimated Annual Operations Greenhouse Gas Emissions (Metric Tons per Year)**

<b>Category</b>	<b>Total CO<sub>2</sub></b>	<b>CH<sub>4</sub></b>	<b>N<sub>2</sub>O</b>	<b>CO<sub>2</sub>e</b>
<b>Area</b>				
Unmitigated (BAU)	4	<1	0	4
Mitigated	4	<1	0	4
<b>Energy</b>				
Unmitigated (BAU)	1,921	<1	0	1,793
Mitigated	1,353	<1	0	1,353
<b>Mobile</b>				
Unmitigated (BAU)	4,010	<1	0	4,010
Mitigated	3,089	<1	0	3,089
<b>Waste</b>				

Unmitigated (BAU)	122	<1	0	122
Mitigated	122	<1	0	122
<b>Water</b>				
Unmitigated (BAU)	185	<1	0	185
Mitigated	185	<1	0	185
<b>Construction*</b>				
Unmitigated (BAU)	229	<1	0	229
Mitigated	229	<1	0	229
<b>Total Emissions</b>				
Unmitigated (BAU)	6,472	<1	0	6,472
Mitigated	4,983	<1	0	4,983
Percent Change	23	0	0	23
<i>Source: DKA Planning 2015 based on CalEEMod analysis</i>  <i>* Pursuant to guidance from the AB32 Scoping Plan and SCAQMD, construction phase emissions were amortized over the lifetime of the project, defined as 30 years, to normalize emissions for comparison with long-term operational emissions.</i>				

In addition to the GHG emission reductions described above, it is important to note that the CO<sub>2</sub>e estimates from mobile sources (particularly CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

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

It is impossible to know at this time whether residents of the Proposed Project would have longer or shorter trips relative to their destinations; whether they would walk, bike, and use public transportation more or less than under existing circumstances; and whether their overall driving habits would result in higher or lower VMT. Much of the vehicle-generated CO<sub>2</sub> emissions attributed to the project could



simply be from vehicles at an existing location moving to the project site, and not from new vehicle emissions sources relative to global climate change. Nevertheless, this analysis assumes a conservative approach that assumes all net emissions from the project are new emissions introduced to the global inventory of GHG emissions. As noted earlier, the Proposed Project would result in 1,434 net metric tons per year of CO<sub>2</sub>e per year less than a “Business as Usual” scenario.

*Proposed Project Compliance with ARB’s AB 32 Scoping Plan Recommended Measures*

Taking all of the factors set forth in Guidelines Section 15064.4(b) into account, the Proposed Project will also be deemed to increase GHG emissions if the Proposed Project would be inconsistent with the ARB AB 32 Scoping Plan and other applicable guidance documents issued in furtherance of AB 32 to date, including the 2006 CAT Report, and the Attorney General’s publication, *CEQA: Addressing Global Warming Impacts at the Local Agency Level* is assessed. By evaluating consistency with all of these documents, it can be determined whether the Proposed Project would achieve the emissions reductions that the Legislature has determined California must achieve.

With the strategies from the ARB’s AB 32 Scoping Plan measure, the consistency of the Proposed Project development is evaluated in Table III.A-7 below, Proposed Project Consistency with ARB Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures. As shown, the Proposed Project would be consistent with the recommended measures of the ARB AB 32 Scoping Plan to reduce greenhouse gas emissions in California. Therefore, the potential impact of the Proposed Project with respect to GHG emissions and consistency with policy analysis would be less than significant.

**Table III.A-7**  
**Proposed Project Consistency with ARB AB 32 Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures**

Measure	Project Consistency
<b>California Air Resources Board</b>	
<b><u>California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions</u></b>	<b>Not Applicable.</b>
Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California’s program meets all applicable AB 32 requirements for market-based mechanisms.	While this measure is not specifically applicable to the Proposed Project, the Proposed Project would not preclude the implementation of this measure by the ARB.
<b><u>California Light-Duty Vehicle Greenhouse Gas Standards</u></b>	<b>Not Applicable.</b>
Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change	The Proposed Project does not influence or impact regulatory decision-making on light-duty vehicle standards.

**Table III.A-7**  
**Proposed Project Consistency with ARB AB 32 Scoping Plan Recommended Greenhouse Gas**  
**Emission Reduction Measures**

Measure	Project Consistency
goals.	
<b><u>Energy Efficiency</u></b> <p>Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).</p>	<b>Consistent.</b> <p>The Proposed Project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. In addition, under State law, appliances that are purchased for the Proposed Project – both pre- and post-development – would be consistent with energy efficiency standards that are in effect at the time of manufacture.</p>
<b><u>Renewables Portfolio Standard</u></b> <p>Achieve 33 percent renewable energy mix statewide.</p>	<b>Not Applicable.</b> <p>While this measure is not applicable, the Proposed Project would not preclude the implementation of this measure by municipal utility providers.</p>
<b><u>Low Carbon Fuel Standard</u></b> <p>Develop and adopt the Low Carbon Fuel Standard.</p>	<b>Not Applicable.</b> <p>The Proposed Project has no influence or impact on regulatory decision-making regarding low carbon fuel standards.</p>
<b><u>Regional Transportation-Related Greenhouse Gas Targets</u></b> <p>Develop regional greenhouse gas emissions reduction targets for passenger vehicles.</p>	<b>Not Applicable.</b> <p>The Proposed Project has no influence or impact on regulatory decision-making regarding GHG emissions targets.</p>
<b><u>Vehicle Efficiency Measures</u></b> <p>Implement light-duty vehicle efficiency measures.</p>	<b>Not Applicable.</b> <p>The Proposed Project has no influence or impact on regulatory decision-making regarding vehicle efficiency standards.</p>
<b><u>Goods Movement</u></b> <p>Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.</p>	<b>Not Applicable.</b> <p>The Proposed Project has no influence or impact on regulatory decision-making regarding the improvement in goods movement activities.</p>
<b><u>Million Solar Roofs Program</u></b> <p>Install 3,000 MW of solar-electric capacity under California's existing solar programs.</p>	<b>Inconsistent.</b> <p>Solar roofs are not specifically proposed as part of the Proposed Project. However, the design of the new residential buildings would not preclude the installation and use of solar equipment in the future if they become cost effective. Specifically, the homebuyer will have the option to utilize solar roofs per the LA Green Building Code.</p>
<b><u>Medium/Heavy-Duty Vehicles</u></b> <p>Adopt medium and heavy-duty vehicle efficiency measures.</p>	<b>Not Applicable.</b> <p>The Proposed Project has no influence or impact on regulatory decision-making regarding medium/heavy-</p>

**Table III.A-7**  
**Proposed Project Consistency with ARB AB 32 Scoping Plan Recommended Greenhouse Gas**  
**Emission Reduction Measures**

<b>Measure</b>	<b>Project Consistency</b>
	duty vehicle efficiency standards.
<b><u>Industrial Emissions</u></b>  Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.	<b>Not Applicable.</b>  The Proposed Project is not an industrial facility and would not involve the operation of industrial processes.
<b><u>High Speed Rail</u></b>  Support implementation of a high speed rail system.	<b>Not Applicable.</b>  While this measure is not applicable, the Proposed Project would not preclude the implementation of this measure by the State.
<b><u>Green Building Strategy</u></b>  Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	<b>Consistent.</b>  Water saving and energy efficient features have been incorporated into the Proposed Project's design features. The Proposed Project will also comply with the City of Los Angeles Green Building Ordinance.
<b><u>High Global Warming Potential Gases</u></b>  Adopt measures to reduce high global warming potential gases.	<b>Consistent.</b>  Water saving and energy efficient features would be incorporated into the project's design features. The Proposed Project would also not preclude the implementation of this measure by the ARB.
<b><u>Recycling and Waste</u></b>  Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	<b>Consistent.</b>  The Proposed Project would be subject to the requirements of AB 939. Additionally, the Proposed Project would be subject to the mitigation measures included in the Original EIR that require the Proposed Project to include recycling of construction materials and recycling facilities in the Project.
<b><u>Sustainable Forests</u></b>  Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	<b>Not Applicable.</b>  The Proposed Project is not located within or near a forest.
<b><u>Water</u></b>  Continue efficiency programs and use cleaner energy sources to move and treat water.	<b>Consistent.</b>  The Proposed Project would be subject to the requirements of the City's Green Building Ordinance and Low Impact Development Ordinance. Water saving and energy efficient features would be incorporated into the Project's design features.

**Table III.A-7**  
**Proposed Project Consistency with ARB AB 32 Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures**

Measure	Project Consistency
<b><u>Agriculture</u></b>  In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	<b>Not Applicable.</b>  The Proposed Project would not include any elements of agriculture.
<i>Sources: Air Resources Board, Climate Change Proposed Scoping Plan, October 2008 and CAJA Environmental Services, August 2012.</i>	

*Compliance with 2006 CAT Report Strategies and the Attorney General's Guidance on Addressing Global Warming Impacts at the Project Level*

The consistency of the Proposed Project with the strategies from the 2006 CAT Report is evaluated in Table III.A-8, Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies. As shown, the Proposed Project would be consistent with all but one feasible and applicable strategies of the 2006 CAT Report.

**Table III.A-8**  
**Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

Strategy	Project Consistency
<b>California Air Resources Board</b>	
<b><u>Vehicle Climate Change Standards</u></b>  AB 1493 (Pavley) required the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks. Regulations were adopted by the ARB I September 2004.	<b>Consistent.</b>  The vehicles that travel to and from the Project Site on public roadways would be in compliance with ARB vehicle standards that are in effect at the time of vehicle purchase.
<b><u>Hydrofluorocarbon Reduction</u></b>  1) Ban retail sale of HFC in small cans. 2) Require that only low GWP refrigerants be used in new vehicular systems. 3) Adopt specifications for new commercial refrigeration. 4) Add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs. 5) Enforce federal ban on releasing HFCs.	<b>Not Applicable.</b>  The Proposed Project has no influence or impact on regulatory decision-making regarding HFC use or sales. This strategy applies to consumer products that may be used by the new residents associated with the Proposed Project. All applicable products would be required to comply with the regulations that are in effect at the time of manufacture.

**Table III.A-8**  
**Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

<b>Strategy</b>	<b>Project Consistency</b>
<b><u>Transportation Refrigeration Units, Off-Road Electrification, Port Electrification (ship to shore)</u></b>  Require all new transportation refrigeration units (TRU) to be equipped with electric standby. Require cold storage facilities to install electric infrastructure to support electric standby TRUs.	<b>Not Applicable.</b>  The Proposed Project would not involve the use of transportation refrigeration units.
<b><u>Manure Management</u></b>  Improved management practices, manure handling practices, and lagoon/liquid waste control options.	<b>Not Applicable.</b>  The Proposed Project would not involve any manure handling.
<b><u>Semi Conductor Industry Targets</u></b>  Emission reduction rules for semiconductor operations.	<b>Not Applicable.</b>  The Proposed Project would not involve any semiconductor operations.
<b><u>Alternative Fuels: Biodiesel Blends</u></b>  ARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel.	<b>Not Applicable.</b>  The Proposed Project has no influence or impact on ARB decision-making regarding fuel blend regulations.
<b><u>Alternative Fuels: Ethanol</u></b>  Increased use of E-85 fuel.	<b>Not Applicable.</b>  The Proposed Project does not impact the availability of fuel blends.
<b><u>Reduced Venting and Leaks on Oil and Gas Systems</u></b>  Improved management practices in the production, processing, transport, and distribution of oil and natural gas.	<b>Not Applicable.</b>  The Proposed Project does not involve any production, processing, transport, or distribution of oil and natural gas.
<b><u>Hydrogen Highway</u></b>  The California Hydrogen Highway Network (CA H2 Net) is a State initiative to promote the use of hydrogen as a means of diversifying the sources of transportation energy.	<b>Not Applicable.</b>  The Proposed Project would not be responsible for promoting the use of hydrogen for transportation energy.
<b><u>Achieve 50% Statewide Recycling Goal</u></b>  Achieving the State's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48% has been achieved on a statewide basis. Therefore, a 2% additional reduction is needed.	<b>Consistent.</b>  The Proposed Project would be subject to the mitigation measures included in the Original EIR that require the Proposed Project to include recycling of construction materials and recycling facilities in the Project. In addition to the mitigation measures in this Proposed Project, the mitigation measures identified in the Original EIR are still in full force and effect.
<b><u>Landfill Methane Capture</u></b>	<b>Not Applicable.</b>

**Table III.A-8**  
**Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

<b>Strategy</b>	<b>Project Consistency</b>
Install direct gas use or electricity projects at landfills to capture and use emitted methane.	The Proposed Project does not involve landfill operations.
<b><u>Zero Waste – High Recycling</u></b>  Efforts to exceed the 50 percent goal would allow for additional reductions in climate change emissions.	<b>Consistent.</b>  The Proposed Project would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future. The Proposed Project would also be subject to the mitigation measures included in the Original EIR that requires the Proposed Project to include recycling of construction materials and recycling facilities in the Project. In addition to the mitigation measures in this Proposed Project, the mitigation measures identified in the Original EIR are still in full force and effect, which together, would help to exceed the 50 percent goal.
<b>Department of Forestry</b>	
<b><u>Forest Management</u></b>  Increasing the growth of individual forest trees, the overall age of trees prior to harvest, or dedicating land to older aged trees.	<b>Not Applicable.</b>  The Proposed Project is not located within or near a forest.
<b><u>Forest Conservation</u></b>  Provide incentives to maintain an undeveloped forest landscape.	<b>Not Applicable.</b>  The Proposed Project is not located within or near a forest.
<b><u>Fuels Management/Biomass</u></b>  Reduce the risk of wildland fire through fuel reduction and biomass development.	<b>Consistent.</b>  The Proposed Project would provide fuel modification services as requested by the City's Fire Department and Municipal Code. This discussion is addressed in further in section III.B.
<b><u>Urban Forestry</u></b>  A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	<b>Consistent.</b>  The Proposed Project has no influence or impact on State decision-making regarding urban forestry programs. However, the Proposed Project includes a 9.5:1 replacement ratio of old trees to new trees, increasing the total number of trees on the Project Site. This added number of trees would help contribute to the statewide goal of planting 5 million trees in urban areas by 2020.
<b><u>Afforestation/Reforestation</u></b>  Reforestation projects focus on restoring native tree cover on lands that were previously forested and are now covered with other vegetative types.	<b>Not Applicable.</b>  The Proposed Project is not located within or near a forest.

**Table III.A-8**  
**Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

<b>Strategy</b>	<b>Project Consistency</b>
<b>Department of Water Resources</b>	
<b><u>Water Use Efficiency</u></b>  Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce greenhouse gas emissions.	<b>Consistent.</b>  The provision of water saving features and energy efficient project design features would be included as part of the Proposed Project approval. These proposed features would help reduce overall use of electricity and natural gas by efficiently using water at the Project Site.
<b>Energy Commission (CEC)</b>	
<b><u>Building Energy Efficiency Standards in Place and in Progress</u></b>  Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).	<b>Not Applicable</b>  The Proposed Project does not influence or impact regulatory decision-making on building energy efficiency standards.
<b><u>Appliance Energy Efficiency Standards in Place and in Progress</u></b>  Public Resources Code 25402 authorizes the Energy Commission to adopt and periodically update its appliance energy efficiency standards (that apply to devices and equipment using energy that are sold or offered for sale in California).	<b>Not Applicable.</b>  The Proposed Project does not influence or impact regulatory decision-making on appliance energy efficiency standards.
<b><u>Fuel-Efficient Replacement Tires &amp; Inflation Programs</u></b>  State legislation established a statewide program to encourage the production and use of more efficient tires.	<b>Not Applicable.</b>  The Proposed Project has no influence or impact on regulatory decision-making on tire production or efficiency standards.
<b><u>Cement Manufacturing</u></b>  Cost-effective reductions to reduce energy consumption and to lower carbon dioxide emissions in the cement industry.	<b>Not Applicable.</b>  The Proposed Project does not involve cement manufacturing.

**Table III.A-8**  
**Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

<b>Strategy</b>	<b>Project Consistency</b>
<b><u>Municipal Utility Energy Efficiency Programs/Demand Response</u></b> Includes energy efficiency programs, renewable portfolio standard, combined heat and power, and transitioning away from carbon-intensive generation.	<b>Not Applicable.</b> While this strategy is not applicable, the Proposed Project would not preclude the implementation of this strategy by municipal utility providers.
<b><u>Municipal Utility Renewable Portfolio Standard</u></b> California's Renewable Portfolio Standard (RPS), established in 2002, requires that all load serving entities achieve a goal of 20 percent of retail electricity sales from renewable energy sources by 2017, within certain cost constraints.	<b>Not Applicable.</b> While this strategy is not applicable, the Proposed Project would not preclude the implementation of this strategy by municipal utility providers.
<b><u>Municipal Utility Combined Heat and Power</u></b> Cost effective reduction from fossil fuel consumption in the commercial and industrial sector through the application of on-site power production to meet both heat and electricity loads.	<b>Not Applicable.</b> While this strategy is not applicable, the Proposed Project would not preclude the implementation of this strategy by municipal utility providers.
<b><u>Municipal Utility Electricity Sector Carbon Policy</u></b> State agencies to address ways to transition investor-owned utilities away from carbon-intensive electricity sources.	<b>Not Applicable.</b> While this strategy is not applicable, the Proposed Project would not preclude the implementation of this strategy by municipal utility providers, if available by a state agency. It is the responsibility of the agency to transition investor owned utilities away from carbon-intensive sources.
<b><u>Alternative Fuels: Non-Petroleum Fuels</u></b> Increasing the use of non-petroleum fuels in California's transportation sector, as recommended in the CEC's 2003 and 2005 Integrated Energy Policy Reports.	<b>Not Applicable.</b> The Proposed Project does not influence or impact regulatory decision-making regarding the composition or availability of non-petroleum fuels, nor consumer choice regarding use of non-petroleum fuels in the transportation sector.
<b>Business, Transportation and Housing</b>	
<b><u>Measures to Improve Transportation Energy Efficiency</u></b> Builds on current efforts to provide a framework for expanded and new initiatives including incentives, tools and information that advance cleaner transportation and reduce climate change emissions.	<b>Not Applicable.</b> While this strategy is not applicable, the Proposed Project would not preclude the implementation of this strategy by state or local agencies.



**Table III.A-8**  
**Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

<b>Strategy</b>	<b>Project Consistency</b>
<p><b><u>Smart Land Use and Intelligent Transportation Systems (ITS)</u></b></p> <p>Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors.</p> <p>ITS is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services.</p> <p>The Governor's office is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through state investments, incentives and technical assistance, land use, and technology strategies that provide for a prosperous economy, social equity and a quality environment.</p> <p>Smart land use, demand management, ITS, and value pricing are critical elements in this plan for improving mobility and transportation efficiency. Specific strategies include: promoting jobs/housing proximity and transit-oriented development; encouraging high density residential/commercial development along transit/rail corridor; valuing and congestion pricing; implementing intelligent transportation systems, traveler information/traffic control, incident management; accelerating the development of broadband infrastructure; and comprehensive, integrated, multimodal/intermodal transportation planning.</p>	<p><b>Not Consistent.</b></p> <p>The Proposed Project is not consistent with this strategy, as the site itself is in an area that is not currently served by nearby transit corridors. Although the Proposed Project is proposing a use that is consistent with its underlying zoning, it is not located in a high-density area of the City. Nevertheless, there are existing and proposed sidewalks on the Project Site and within the vicinity that helps promote mobility and jobs/housing proximity.</p> <p>Additionally, the Proposed Project would create rideshare promotion programs that encourage the use of rideshare transit services. Transportation management coordination programs would be implemented to help plan and manage transportation efforts in and around the Project Site. Alternative transportation education would also be promoted to future residents of the Proposed Project in addition providing a transportation information center on-site, which would provide literature and public information on transportation alternatives and programs in the City of Los Angeles.</p>
<b>Department of Food and Agriculture</b>	
<p><b><u>Conservation Tillage/Cover Crops</u></b></p> <p>Conservation tillage and cover crops practices are used to improve soil tilt and water use efficiency, and to reduce tillage requirements, labor, fuel, and fertilizer requirements.</p>	<p><b>Not Applicable.</b></p> <p>The Proposed Project would not include any elements of agriculture.</p>
<p><b><u>Enteric Fermentation</u></b></p> <p>Cattle emit methane from digestion processes. Changes in diet could result in a reduction in emissions.</p>	<p><b>Not Applicable.</b></p> <p>The Proposed Project would not include any elements of agriculture.</p>

**Table III.A-8**  
**Project Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies**

<b>Strategy</b>	<b>Project Consistency</b>
<b><u>State and Consumer Services Agency</u></b>	
<b><u>Green Buildings Initiative</u></b>  Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. The Executive Order and related action plan spell out specific actions state agencies are to take with state-owned and –leased buildings. The order and plan also discuss various strategies and incentives to encourage private building owners and operators to achieve the 20 percent target.	<b>Consistent.</b>  As discussed previously, the Proposed Project would be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development.
<b><u>Public Utilities Commission (PUC)</u></b>	
<b><u>Accelerated Renewable Portfolio Standard</u></b>  The Governor has set a goal of achieving 33 percent renewable in the State’s resource mix by 2020. The joint PUC/Energy Commission September 2005 Energy Action Plan II (EAP II) adopts the 33 percent goal.	<b>Not Applicable.</b>  While this strategy is not applicable, the Proposed Project would not preclude the implementation of this strategy by municipal utility providers. Nevertheless, the Proposed Project is committed to purchasing green power from the LADWP.
<b><u>California Solar Initiative</u></b>  The solar initiative includes installation of 1 million solar roofs or an equivalent 3,000 MW by 2017 on homes and businesses, increased use of solar thermal systems to offset the increasing demand for natural gas, use of advanced metering in solar applications, and creation of a funding source that can provide rebates over 10 years through a declining incentive schedule.	<b>Inconsistent.</b>  Solar roofs are not proposed as part of the Proposed Project. However, the design of the new residential buildings would not preclude the installation and use of solar equipment in the future. Solar roofs could be installed (and will be pre-designed to allow easy installation) if they become cost effective from a purchase and maintenance standpoint of the property owners.
<b><u>Investor-Owned Utility Programs</u></b>  These strategies include energy efficiency programs, combined heat and power initiative, and electricity sector carbon policy for investor owned utilities.	<b>Not applicable.</b>  While this strategy is not applicable, the Proposed Project would not preclude the implementation of this strategy by investor owned utility providers.
<i>Sources: Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2006 and CAJA Environmental Services, June 2015.</i>	

Nevertheless, there are existing and proposed sidewalks on the Project Site and within the vicinity that helps promote mobility and jobs/housing proximity. Additionally, the Proposed Project would create rideshare promotion programs that encourage the use of rideshare transit services, such as car pools. Transportation management coordination programs would be implemented to help plan and manage transportation efforts in and around the Project Site. These coordination programs include alternative transportation methods such as bicycles and low-fuel vehicle use. Alternative transportation education would also be promoted to future residents of the Proposed Project in addition providing a transportation information center on-site. Solar roofs are not proposed as part of the Proposed Project, but the Green

Building Code requires the design of the new residential buildings to accommodate the future installation and use of solar equipment. Overall, impacts would be less than significant and no mitigation measures are required.

## **CUMULATIVE IMPACTS**

Although the Proposed Project is expected to emit 4,748 net metric tons of CO<sub>2</sub>e per year, the emission of greenhouse gases by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of greenhouse gas from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. A project's greenhouse gas emissions typically would be relatively very small in comparison to state or global greenhouse gas emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is speculative to identify the specific impact, if any, to global climate change from one project's incremental increase in global greenhouse gas emissions. As such, the project-specific analysis conducted above is essentially already a cumulative analysis, because it takes into consideration statewide GHG reduction targets and demonstrates that the Proposed Project would be consistent with those targets. As discussed above, the Proposed Project would also be consistent with all but two of the recommended measures of the ARB AB 32 Scoping Plan to reduce greenhouse gas emissions in California. In addition, net emissions from the project are more than 20 percent lower than any BAU scenario. Since compliance with these measures and goals are required at the state and City level, future and cumulative projects would be required to illustrate compliance with such measures as well. Thus, the Project would not contribute to cumulative impacts and a less than significant cumulative impact would result with regard to the Proposed Project.

## **MITIGATION MEASURES**

No mitigation measures are required.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

As stated above, since the Proposed Project would be consistent with all but two of the provisions of the AB 32 Scoping Plan and 2006 CAT Report, it does not significantly conflict with or hinder the adopted state strategies for achieving reductions in GHG emissions to meet the requirements of AB 32. Further, the proposed project design features and compliance measures would reduce 23 percent of GHG emissions over a "Business as Usual" scenario and more than meet the 2005 Scoping Plan's macro goal of reducing 15 percent of GHG emissions. Because of the limitations of the CalEEMod model, the actual emissions reduced from proposed design features is likely greater than the quantified analysis, likely reducing well over 23 percent of emissions from a BAU scenario. As a result, impacts of the Proposed Project with respect to GHGs and climate change would be less than significant.

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### III. ENVIRONMENTAL IMPACT ANALYSIS

#### B. CULTURAL RESOURCES / HISTORIC RESOURCES

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#### INTRODUCTION

##### **Tuna Canyon Detention Station**

Since the initial preparation of the Original DEIR, the City of Los Angeles has taken steps to acknowledge the cultural history of the Tuna Canyon Detention Station formerly located on the Project Site. On October 12, 2012, a Motion was adopted by the Los Angeles City Council to initiate consideration of the Tuna Canyon Detention Station site for designation as a Historic-Cultural Monument (HCM). A complete list of all of the materials discussed hereinafter is included as Appendix C to this RP-DEIR. On January 29, 2013 the matter of initiating an application to designate the Tuna Canyon Detention Station site was heard by the City Council's Planning and Land Use Management ("PLUM") Committee. The PLUM Committee forwarded the matter to the City Council without a recommendation. On February 12, 2013, the City Council adopted Motion 7A, instructing the City to prepare a Historic-Cultural Monument application regarding the inclusion of Tuna Canyon Detention Station site in the City's list of Historic-Cultural Monuments for review and consideration by the Cultural Heritage Commission.

The City's Office of Historic Resources prepared and filed application CHC-2013-844-HCM (and associated ENV-2013-845-CE) with the Department of City Planning ("DCP") on March 22, 2013. On April 4, 2013, the Cultural Heritage Commissioners and Office of Historic Resources staff conducted a site visit of the Tuna Canyon Detention Station site. Thereafter, a report was prepared by City staff recommending that the Cultural Heritage Commission not declare the property a Historic-Cultural Monument. At its April 18, 2013 meeting, the Cultural Heritage Commission followed staff's recommendation and determined that the Tuna Canyon Detention Station site does not meet the criteria for historic-cultural monument designation.

On June 11, 2013, the Cultural Heritage Commission's recommendation was considered by the PLUM Committee. Following public hearing, the PLUM Committee did not recommend designation of the site, instead recommending, in part, to "establish a working group, consisting of the property owner and representative, experts or historians from the Japanese community (no more than five people), and DCP staff, to report back to the PLUM Committee prior to July 31, 2013 to develop ideas on how to recognize the historical and cultural significance of the site." The matter was thereafter scheduled for City Council on June 21, 2013. The Los Angeles City Council heard the matter on June 21, 2013 and subsequently continued the matter until its June 25, 2013 meeting. On June 25, 2013, the City Council adopted Motion 54A which, in part, declared a "...portion of the property located at 6433 West La Tuna Canyon Road (Assessor Parcel No. 2572021020) with Coast Live Oaks and Sycamores, as depicted on the attached map (labeled Exhibit A), a Historic-Cultural Monument per Los Angeles Administrative Code Chapter 9, Division 22, Article 1, Section 22.171.7." Pursuant to Motion 54A, a Historic Tuna Canyon Detention Station Working Group was convened and instructed to report back to the City Council within 60 days.

On September 10, 2013, the City of Los Angeles prepared its summary report on the working group for the site.

As a result of the City Council's action, a designated portion of the site is subject to the provisions set forth in Los Angeles Municipal Code Section 22.171 et seq. The analysis herein analyzes the City Council's action, as it relates to the Proposed Project.

### **Verdugo Hills Golf Course**

The Original DEIR's historical resources analysis did not evaluate the historical or cultural significance of the Verdugo Hills Golf Course itself and its associated features. As such, this section has been revised to supplement the analysis previously conducted and to specifically evaluate historic and cultural significance associated with the Verdugo Hills Golf Course and its associated features. The analysis below is based on the Historical Resources Assessment Report, prepared by PCR Services, August 2015, and is attached as Appendix D, to this RP-DEIR.

## **ENVIRONMENTAL SETTING**

### **Regulatory Framework**

#### ***Historic Designations***

A property may be designated as historic by national, state, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

#### ***National Register of Historic Places***

The National Register of Historic Places is an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment. The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not, in and of itself, provide protection of an historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive federal funding, a clearance process must be

completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting any or all of the criteria listed above, properties nominated must also possess integrity of location, design, setting, materials, workmanship, feeling, and association.

#### *California Register of Historical Resources*

The California Register is an authoritative guide in California used by state and local agencies, private groups, and citizens to identify the State's historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.

The criteria for eligibility for listing in the California Register are based upon National Register criteria. These criteria are:

- 1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
- 2. Associated with the lives of persons important to local, California or national history;
- 3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or
- 4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register includes the following:

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places;
- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (commission); and
- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.<sup>1</sup>

Other resources which may be nominated for listing in the California Register include:

- Individual historic resources;
- Historic resources contributing to the significance of an historic district;
- Historic resources identified as significant in historic resources surveys, if the survey meets the criteria listed in subdivision (g);
- Historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria; and
- Local landmarks or historic properties designated under any municipal or county ordinance.<sup>2</sup>

#### *Local Designation Programs*

The Los Angeles City Council designates Historic-Cultural Monuments on recommendation of the City's Cultural Heritage Commission. Chapter 9, Section 22.171.7 of the City of Los Angeles Administrative Code defines an historical or cultural monument as:

*"... a Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which*

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<sup>1</sup> California PRC, Section 5023.1(d).

<sup>2</sup> California PRC, Section 5023.1(e).

*is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.”*

Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for Historic-Cultural Monument status. Buildings may be eligible for historical cultural monument status if they retain their historic design and materials. Those that are intact examples of past architectural styles or that have historical associations may meet the criteria in the Cultural Heritage ordinance.

### **Existing Conditions**

#### ***Literature Search***

On August 3, 2005, a record search was undertaken by SWCA archaeologist Joan Brown at the South Central Coastal Information Center, California State University, Fullerton to acquire information regarding archaeological sites and investigations within the study area and a one-mile radius of the study area. A check was also made of historic maps, the National Register of Historic Places, the California State Historic Resources Inventory, and the listing of California Historical Landmarks. According to the files, 11 cultural resources studies were accomplished within the one-mile radius. None of those studies included the current project area or resulted in the recordation of resources. A bibliography of the studies is included as Appendix C, of the Original DEIR.

Jim Steely, SWCA Architectural Historian performed additional research at the Bolton Hall Museum, Tujunga; the La Crescenta Library, Los Angeles County; and the Japanese National Museum Archives.

#### ***Research Methodology***

In addition to the literature reviews, SWCA Environmental Consultants conducted a cultural resources pedestrian reconnaissance of the property to determine the presence or absence of surficial cultural resources. SWCA Architectural Historian Jim Steely examined the property in September 2005. No historic artifactual material was observed during the archaeological survey. See Appendix G-1 of the Original DEIR for details of the research methodology.

#### ***Historic Overview***

The first Europeans to observe what would come to be called southern California were members of the A.D. 1542 expedition of Juan Rodriguez Cabrillo. However, Cabrillo and other early explorers only sailed along the coast and did not travel far inland until several centuries later. The first recorded Euro-American entry into the immediate vicinity of the project area comes from diary accounts of the 1769-70 Portolá Expedition. On their two treks north from San Diego to locate Monterey Bay they passed through



Los Angeles County. The first expedition occurred in late July 1769. After crossing the Los Angeles River near the future site of *El Pueblo de Nuestra Señora* (Los Angeles) they came close to the Verdugo Hills on August 5<sup>th</sup> when the expedition crossed over Sepulveda Pass into the San Fernando Valley, eleven miles to the south.

Known as *reducción*, the process of converting the local Native American population through baptism and subsequent relocation to the mission grounds started in this region with the efforts of the Franciscan padres at Mission San Gabriel. This process initially involved the Eastern Gabrielino of the plains as far south as the Santa Ana River and west to the Los Angeles River.

Mission San Fernando del Rey was founded in 1797, twenty-six years after the San Gabriel Mission was established. As this new mission started to grow, its priests pushed into the lands of other tribes located to the north and west, and also converting *Tongva* people along the Los Angeles River and its tributaries. While mission life did give the Indians some skills needed to survive in a rapidly changing world, considerable amounts of traditional cultural knowledge was lost during this era, in large part due to population decimation brought on by introduced diseases for which the people had no immunity.

With the founding of the Pueblo of Los Angeles in December of 1781, civilian settlers came into the region soon followed by retiring military men and their families from the Spanish garrisons. Throughout southern California several of the soldiers were given vast tracts of land, known as *ranchos*, in order to start farms and ranches. These colonists enlisted the labor of the surrounding Indian population to work their field and cattle herds.

As the decades passed, the *ranchos* came to be operated as virtually self-contained economic units. Their owners, or *rancheros*, maintained strict class distinctions, referring to themselves as *dons*. The *pobaldores* (family farmers), new arrivals from Mexico, and the Native Americans (both neophytes from the disintegrating missions and *cimarrones*, or gentile Indians) comprised the new generation of workers, soldiers, artisans, peons, and *vaqueros* who conducted the labor to maintain the *rancheros* and their *ranchos*. The *ranchos* were successful in producing great quantities of cattle that, after being rendered into hides and tallow, gave the *dons* the means to trade for goods throughout the world.

Following the Mexican revolution in 1812, governmental control of California shifted to Mexico in 1821. Over the proceeding decade the influence of *rancheros* and other decedents of settlers who now saw themselves as *Californios*, continued to grow while that of the Franciscan missions waned. In 1834, the missions were formally secularized and in the subsequent years the formerly extensive mission lands were divided into further private land grants, claimed by the growing *ranchero* class.

Following the Mexican-American War of 1846 and the transfer to United States governmental control, a Land Claims Commission was established to regularize land titles under the new legal system. In addition to the new land title system, a legislature dominated by Americans passed a number of laws that were designed to break up these large land holdings. A combination of new land taxes, extensive fencing

regulations, and other “incentives” led many ranchers to sell off large portions of their holdings to the arriving agriculturalists.

During this time of legal and economic upheaval there was a steady stream of American settlers coming into the region from the east. It was not until the 1880s, however, with the arrival of the railroads that a great influx of immigrants entered California. Known as the “Boom of the 80s”, it was in this decade that land development became an intensive new industry.

### ***Project Site Area, 1882-1933***

The project area is situated primarily on a small enclave of the Rancho La Cañada that juts into Las Barras Canyon. The northwest corner of the property, in the hills, comes from the Rancho San Rafael. The boundaries of the ranchos, along with that of Rancho Tujunga and open land used by the two missions meets at a corner just one mile due north of the golf course, and so surveyors likely established a *lindero*, or property marker, at that spot in Blanchard Canyon. Otherwise, during the Spanish and Mexican era there would have been little formal boundary between these two tracts and cattle would have roamed free between them, and probably those from the Rancho Tujunga and Mission San Gabriel as well.

The “Boom of the [18]80s” brought Anglo settler Phillip Bengue in 1882 to the southward sloping valley between the Verdugo Hills and the San Gabriel Mountains. “The outstanding recollection [some 60 years later] of the elderly pioneer was a band of Indians camped on the meadow to the south of the dry stream-bed,” wrote a local old timer for the *Montrose Ledger*’s regular column “In the Crescenta-Canada Valley” on November 11, 1947. “The reason for the encampment was a well of fine, cool water, the only source of refreshment for many miles.”

Charleston Dow [who later bought the property from Bengue] was a youngster when he first visited the Valley in 1906 and he well remembers the old stone cabin erected in the canyon by Phil Bengue.... Dow recalls [in 1947] the rutty road that passed the place, running north-westerly past the Fehlhaber ranch, through Horse Thief Pass into the Monte Vista Valley that later became Sunland and Tujunga.... The road through the Verdugo Canyon was a winding affair, passing around large rocks and tall sycamores (Longman 1992).

“The CCC camp,” the old timer continued, “was established on the premises in 1933 and named Las Tunas Canyon CCC by the government. It was at that time that the site found itself in the limelight for the first time.” (Longman 1992).

### ***Civilian Conservation Corps in Rural Los Angeles County, 1933-1942***

The Civilian Conservation Corps (CCC) emerged as the first operational program on the New Deal list of federal public works programs to battle the Great Depression, with the CCC's inauguration on April 5, 1933. President Franklin D. Roosevelt and his closest advisors envisioned a “Forest Army” of young men

recruited across the nation and assigned to remote camps for conservation work, including clearing, planting, fire fighting, road building, and recreation improvements. The CCC recruited young men aged 17-28 as “enrollees” for six-month commitments and assignments.

One of the early strategies for the CCC resulted in large-scale recruiting of urban youths from eastern cities and shipping them to western public lands for their six-month enrollments. The program proved enormously and immediately popular and its recruiters reached their limit of 300,000 (including 25,000 “local experienced men” with trade skills, and 25,000 older war veterans assigned to their own camps) within a month after its establishment. USDA and Interior selected job sites in cooperation with the Army, who ensured water supplies, transportation networks, and local availability of food supplies. Through Congressional pressure to inject the maximum Depression-relief funds directly into local communities, the Army leased private parcels for CCC camps and contracted with local carpenters to build barrack compounds. The USDA Forest Service, itself founded in 1905 to manage national forests and promulgate conservation practices on all forested lands including private holdings, received and directed the greatest number of CCC companies in the nation.

Sometime in May 1933 the USDA Forest Service identified the need for multiple CCC projects for its Angeles National Forest lands in the foothills and San Gabriel Mountains of northern Los Angeles County. The Army scouted suitable campsites—water, transportation, supplies—and settled on one camp at Castiac northwest of San Fernando, and one camp at Tujunga north of Glendale (NACCCA 2005). For the Tujunga camp, the Army identified spring-fed land at the junction of Las Barras Canyon (now called Tuna Canyon) and Verdugo Wash (now drained by the Blanchard Canyon Channel). Tujunga residents Charleston and Leeta Dow owned the land (Charleston arrived in the Tujunga area in 1906) and leased to the Army for \$30 per month about 60 acres bounded on the south, west, and north by the Verdugo Hills (or Mountains), and on the east by Tujunga Canyon Boulevard. On May 31, 1933, about 200 young men of CCC Company 548 arrived to establish the “La [or Las] Tuna Canyon” camp, thereby extending the name of connecting Tuna Canyon to the west into Las Barras Canyon, and erasing Las Barras from future maps. The Forest Service assigned project number “F-135” to the camp, indicating “Federal” land and the 135<sup>th</sup> CCC project identified on all Forest Service lands (NACCCA 2005).

To accommodate the new CCC compound, Army contractors cleared a natural plain on the parcel’s east side. The compound eventually consisted of seven barracks (including the four largest buildings of 50-man capacity), a mess hall, an administration building, an office building, and the infirmary. Other structures separated from the living and office area included garages and shelters for motorized equipment and a blacksmith shop. The earliest assignments for Company 548 performing Project F-135 included forest-access roads and water retention tanks with 2,000 to 5,000 gallon capacity in Angeles National Forest above Sunland, Tujunga, and La Crescenta.

On April 21, 1934, CCC Company 902 transferred to the La Tuna Canyon camp. The USDA Forest Service project for La Tuna Canyon also changed with the switch to Company 902, now “P-223” indicating “Private” forestland and the 223<sup>rd</sup> project so assigned (NACCCA 2005).

Camp work projects expanded onto the vast private holdings in the Verdugo Hills, San Gabriel Mountains, and Crescenta Valley to restore hardwood groves and drainages after severe fires and flooding throughout the region in the winter of 1933-1934. The CCC enrollees of Company 902 cleared brush and cut numerous fire trails and culverts, and built at least four steel forest-fire lookout towers on strategic mountain elevations. They also built a recreation road to the 1931 Big Tujunga Dam with 12 campsites featuring concrete picnic tables and cooking hearths, and another road through La Tuna Canyon to Brand Park in north Glendale. The new Blanchard Canyon Channel for more effective drainage of Big Tujunga Wash was built by other New Deal-assisted labor in 1934 and passed between the CCC compound and Tujunga Canyon Boulevard, redefining the Dow property and the CCC camp's eastern boundary (this channel is now lined with concrete and defines the east boundary of Verdugo Hills Golf Course). The La Tuna Canyon CCC camp was abandoned in the fall of 1941, although the Army's new priorities postponed its decade-long routine of dismantling vacated CCC camps, with no funding or manpower for the job.

### ***Japanese-American Internment During World War II, 1941-1946***

The surprise attack by Japan on Pearl Harbor, Hawaiian Territory, on December 7, 1941, set in motion a series of events that forever changed the people of the United States. Not only did it result in the direct engagement of the nation in the military conflict of World War II, but it also caused the country to look inward in an effort to root out perceived domestic espionage, which resulted in the singling out of subgroups of the nation's population as likely suspects. The notion that the Empire of Japan could launch an attack on the United States without assistance from someone within the U.S. seemed implausible to the reeling country in the days and weeks after the attack. Additional attacks beyond Hawaii on the U.S. mainland seemed quite plausible in the initial confusion. And with the anger and fear that followed in those days and weeks, domestic partners in Japan's plot were sought out.

In a nation where racism at many levels in many regions was still rampant, suspicion naturally fell on the relatively large contingent of Japanese and Japanese-Americans living on the West Coast of America. The overt suspicion began in the halls of the federal government and soon spread to the general population, who adopted the philosophy that since the Japanese in America looked like the enemy, they must be the enemy, or at least be aiding the enemy. The surprise nature of the attack on Pearl Harbor prompted the blanket perception that the Japanese were, as a "race," devious and sneaky, regardless of where they were living. Racially-motivated assaults on Japanese immigrants and their American-born children along the West Coast escalated over the months following the Pearl Harbor attack. Individuals were beaten, shops were torched or otherwise damaged, and the Japanese in America were generally made to feel unwelcome.

For immediate reasons of mutual protection, or perhaps fulfillment of plans already in place before December 7, the next day—Monday, December 8—the Immigration and Natural Service commandeered the La Tuna Canyon CCC camp. According to a report written by the “Officer in Charge” the following May:

C.C.C. Camp 902, 6330 Tujunga Canyon Boulevard, Tujunga, California, was taken over by the U.S. Department of Justice, Immigration and Naturalization Service, for the detention of alien enemies as of December 8, 1941, and for identification purposes, took the name "Tuna Canyon Detention Station, Immigration and Naturalization Service"....

The first alien enemies were received [at least 95 by December 25] as of December 16, 1941, and since that date the Station has operated as a clearing-house for the male Japanese enemy aliens arrested in Southern California. (Scott 1942:1)

Even with early incarcerations, government concerns regarding the potential for sabotage and espionage among the Japanese population along the coast quickly continued to grow. As a result, President Franklin Roosevelt authorized Executive Order 9066 in February 1942, providing for the mandatory evacuation of persons of "enemy nationalities" from specific areas of the United States. Although the brunt of the Executive Order fell on individuals of Japanese ancestry, those of German and Italian descent were also subject to the order. A number of these non-Oriental individuals also found their way to the Tuna Canyon Station as well.

Executive Order 9066 bestowed the authority to military commanders to designate areas "from which any or all persons may be excluded." Under this order, Military Area Nos. 1 and 2 were established throughout most of California and other portions of the West Coast. All Japanese and Americans of Japanese ancestry, as well as all Germans and Italians and their descendents, were to be removed from the exclusion area to areas further inland, where, it was believed, the suspected espionage could not take place, or at least would be far less effective. Announcements of the mandatory evacuation were made a month later via newspaper, posters, and other means along the West Coast noting that persons of Japanese ancestry had until early April to leave the designated exclusion areas and noting that failure to do so would result in forcible relocation of all those who remained. Those individuals and families who had relatives elsewhere in the country or the means to relocate themselves left the area. Those who did not remained in the area and were subject to forced removal.

On March 11, 1942, the Wartime Civilian Control Administration (WCCA) was created and given the task of building temporary holding facilities to hold Japanese and Japanese-Americans that were being forcibly relocated away from the West Coast. Known euphemistically as "Assembly Centers," most of these temporary facilities were located on large fairgrounds and racetracks, where horse stalls were converted to living quarters. In general, these temporary centers held detainees from late March 1942 to mid-October 1942, at which time the detainees were transferred to other facilities farther inland.

On March 18, 1942, by Executive Order 9102, the Department of the Interior created the War Relocation Authority (WRA), a civilian agency, to establish more permanent detention centers outside of the exclusion areas. Internment camps were constructed and existing facilities were refurbished in seven states in the western part of the country. Each of these camps housed thousands of internees, both Japanese immigrants (the Issei) and American citizens of Japanese descent (the Nisei). Native Alaskans from the Aleutians and elsewhere in Alaska, and Japanese-Americans in some areas of South America,

were also brought to relocation camps in the mainland United States. Ultimately, roughly 113,000 individuals of Japanese ancestry were detained in these camps.

### ***Tuna Canyon Detention Station***

The hastily established Tuna Canyon Detention Station of 1941 near Tujunga in the hills north of Los Angeles (present site of the Verdugo Hills Golf Course) was one of the first temporary facilities. A former CCC camp with residential infrastructure for about 300 men, the Tuna Canyon camp was operated by the INS as part of the DOJ, and purportedly held detainees who had been arrested by the FBI. Other camps of similar operation in California were established at Angel Island, Pomona, San Pedro, Santa Anita, and Sharp Park.

The detainees held in the temporary detention facilities such as the one at Tuna Canyon were subject to hearings or trials run by the DOJ. Following the hearings, the majority of the detainees were temporarily sent to camps run by the U.S. Army. After May 1943, these detainees were returned to the DOJ camps for detention throughout the remainder of the war. It should be noted that available records indicate that "no person of Japanese ancestry living in the United States was ever convicted of any serious act of espionage or sabotage during the war years."

The Tuna Canyon station utilized the complete CCC camp compound, apparently neither adding nor taking away buildings, but fencing the compound within at least part of the original Dow property lease area. "Officer in Charge" M.H. Scott summarized his assets as "seven (7) Barracks, one (1) infirmary, one (1) mess hall, and one (1) administration building and one (1) office building" (Scott 1942:1). Tujunga historian Marlene Hitt summarized several news reports, including the December 18, 1941, *Record-Ledger of the Verdugo Hills* in its description of the camp, headlined "Plan to Intern 250 Japanese Aliens in Tuna Canyon CCC Camp—Bunk Houses Are Enclosed With High Fence."

The location was approximately where Sister Elsie's [a legendary Catholic nun c. 1850] goats once were and where the Verdugo Hills Golf Course is now. During the week preceding that date [December 16, 1941], workmen had prepared the CCC camp to serve as a camp for "alien enemies" taken into custody by the FBI. Men from the Department of Immigration and Naturalization were hurriedly completing the organization of guards.

The buildings at Tuna Canyon camp included four large dormitories or bunk houses, a mess hall, a library, a recreation room, a work shop, a barber shop, a tool house, two shops for repairing cars and trucks, a blacksmith shop, a shower room, and two large garages for the storage of cars. All were enclosed by a 12-foot heavy woven wire fence with strands of barbed wire on top and electric lights placed at intervals to aid armed guards in frustrating any attempt at escape (Hitt 2002:147).

By the time of Scott's May 1942 report, his facility had detained and processed 1,490 males of Japanese ancestry, most subsequently transferred (probably by train from Glendale) in generally 100, 200, and 300-

man groups to Fort Missoula, Montana, Fort Lincoln, North Dakota, and Santa Fe, New Mexico. As of May 25, 1942, Scott reported 76 men “still in detention” at the facility, representing a constant rising and falling number incarcerated throughout the war.

Following the pattern of many other detention stations, the Tuna Canyon station also held males of Italian and German descent, some extradited from South American countries, and even some Poles according to local memories. “Italians, Poles, Germans and Japanese were funneled through the camp on Tujunga Canyon and sent out to camps north and east. They lost everything.” remembered a resident to historian Hitt in her publication on local history *After Pearl Harbor* (Hitt n.d.a:57).

### ***Post-World War II Overview, 1946-1960***

“After the war,” wrote the *Montrose Ledger*’s historical columnist on November 13, 1947, “Los Angeles County purchased 10½ acres of the Dow property and established a school for boys (no criminals) between the ages of 11 and 15 years. In 1960 the property became the Verdugo Hills Golf Course, and its developers removed these buildings and re-shaped most of the relatively level parts of the property into terraces for their 18-hole golf course. The course’s separate driving range and maintenance area on the property’s eastern edge, however, reveal the former location of the CCC/INS compound. Perhaps some of the oldest Oak trees along the driving range edges survive from the 1930s and 1940s when they shaded CCC enrollees and Japanese American detainees.

Also after the war, the southern California region continued to grow and so did the population centers north of downtown Los Angeles. The aging Verdugo Hills agricultural colonies of Tujunga, La Crescenta, La Cañada, and Montrose absorbed many new residents and businesses along their common spine of Foothill Boulevard. After its long-envisioned construction in 1966, La Tuna Canyon Road became the route of local traffic between the foothill communities of the San Gabriel and San Fernando Valleys. In the 1970s the Foothill Freeway (State Highway 210, built to Interstate Highway standards) was designed to link the many “suburban cities and communities that surround Los Angeles to its north and south, and allow access to the San Fernando Valley without having to pass through the congestion of Downtown Los Angeles”. Construction started in 1971 and it soon passed west through Pasadena and La Cañada-Flintridge, ending at the intersection of Honolulu Avenue and La Tuna Canyon Road (the entrance to the Verdugo Hills Golf Course). To relieve traffic from the burgeoning residential developments in both valleys, in 1977 the Foothill Freeway was pushed through the Verdugo Hills, providing another link between two major portions of metropolitan Los Angeles.

### ***The City’s 2013 Historic-Cultural Monument Designation in Relation to the Proposed Project***

On June 25, 2013, the City Council adopted Motion 54A which, in part, declared a “...portion of the property located at 6433 West La Tuna Canyon Road (Assessor Parcel No. 2572021020) with Coast Live Oaks and Sycamores, as depicted on the attached map (labeled Exhibit A), a Historic-Cultural Monument

per Los Angeles Administrative Code Chapter 9, Division 22, Article 1, Section 22.171.7.” [Motion 54A, dated June 25, 2013, is attached hereto as Appendix H.]

As a result of the City Council’s action, the designated portion of the site is subject to the provisions set forth in the following Los Angeles Administrative Code sections:

*Sec. 22.171.14. Commission Review.*

“No permit for the demolition, substantial alteration or relocation of any Monument shall be issued, and no Monument shall be demolished, substantially altered or relocated without first referring the matter to the Commission, except where the Superintendent of Building or the City Engineer determines that demolition, relocation or substantial alteration of any Monument is immediately necessary in the interest of the public health, safety or general welfare.

(a) Standards for Issuance of a Permit for Substantial Alteration. The Commission shall base a determination on the approval of a permit for the substantial alteration of a Monument on each of the following:

1. The substantial alteration, including additional buildings on a site containing multiple buildings with a unified use, complies with the Standards for Rehabilitation approved by the United States Secretary of the Interior; and
2. Whether the substantial alteration protects and preserves the historic and architectural qualities and the physical characteristics that make the site, building, or structure a designated Monument; and
3. Compliance with the California Environmental Quality Act, Public Resources Code Section 21000 et seq.

(b) Standards for Issuance of a Permit for the Demolition or Relocation of a Site, Building or Structure Designated a Monument. The Commission shall base its determination on the approval of a permit for the demolition or removal of any Monument on the following:

1. A report regarding the structural soundness of the building or structure and its suitability for continued use, renovation, restoration or rehabilitation from a licensed engineer or architect who meets the Secretary of the Interior's Profession Qualification Standards as established by the Code of Federal Regulations, 36 CFR Part 61. This report shall be based on the Secretary of the Interior's Standards for Architectural and Engineering Documentation with Guidelines; and
2. Compliance with the California Environmental Quality Act, Public Resources Code Section 21000 et seq.”



*Sec. 22.171.15. Time for Objection By the Commission.*

“Where any matters subject to Section 22.171.14 of this article are referred to the Commission by its staff, the Commission shall have 30 days from the date of the referral to object to the proposed demolition, substantial alteration or relocation. If no objection is filed with the appropriate Department or Board within 30 days, all objections shall be deemed to have been waived. If the Commission objects to the proposed demolition, substantial alteration or relocation, it shall file its objection with the appropriate Department or Board.

Any objection by the Commission shall be set for a public hearing. The objection and the fact that the matter will be scheduled for a public hearing by the Commission shall be noted by Commission staff on the clearance worksheet utilized by the appropriate Department or Board for the issuance of the permit. The filing of an objection shall suspend the issuance of any permit for the demolition, substantial alteration, or relocation of the Monument (Stay) for a period of not less than 30 nor more than 180 days, during which time the Commission shall take all steps within the scope of its powers and duties as it determines are necessary for the preservation of the Monument to be demolished, altered or relocated.

At the end of the first 30 days of the Stay, staff of the Department shall report any progress regarding preservation of the Monument to the Commission, which may, upon review of the progress report, withdraw and cancel its objection to the proposed demolition, substantial alteration or relocation. If the Commission determines, upon the basis of the progress report to withdraw and cancel its objection, it shall promptly notify the appropriate Department or Board concerned of its action. Upon receipt of notification of withdrawal of the objection, the permit may be issued and the Monument may be demolished, altered or relocated. If the Commission does not withdraw and cancel its objection, the Stay shall remain in effect.

If the Commission, or the staff of the Department acting on the Commission's behalf, finds at the end of the first 100 days of the Stay that the preservation of the Monument cannot be fully accomplished with the 180-day Stay period, and the Commission determines that preservation can be satisfactorily completed within an additional period not to exceed an additional 180-day Stay, the Commission may recommend to the City Council that the Stay be extended to accomplish the preservation. No request for an extension shall be made after the expiration of the original 180-day Stay.

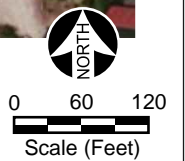
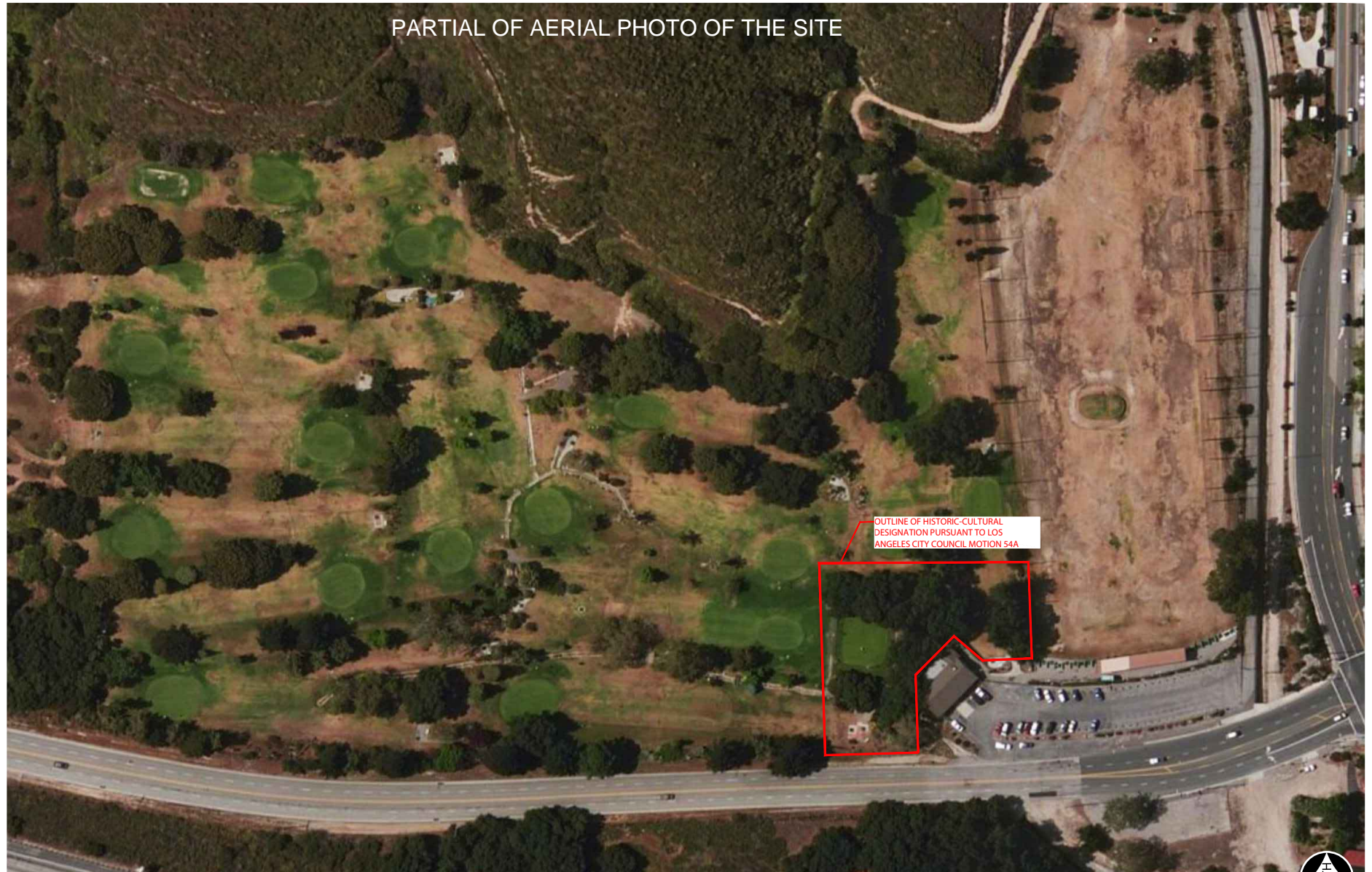
The Commission's recommendation for an extension of the Stay shall set forth the reasons for the extension and the progress to date of the steps taken to preserve the Monument. If it appears that preservation may be completed within the time extension requested, the City Council may approve the request for extension of the Stay not to exceed an additional 180 days for the purpose of completing preservation of the Monument.

No request for an extension of the Stay shall be granted where the Council determines, after consulting with the appropriate Department or Board, that granting an extension is not in the best interest of the public health, safety or general welfare.”

The existing area within the designated portion of the Property consists of a small portion of the golf course including a practice putting green, Oak trees, sidewalks, etc. (refer to Figure III.B-1 for an aerial photograph of the Project Site with the HCM designation area overlaid in red). The Proposed Project proposes approximately seventeen (17) houses (identified by numbers 1, 2, and 20-34), three (3) internal roadways (identified by letters A, C, and D), approximately 100' of sidewalk, curb, and gutter along La Tuna Canyon Road, and common area landscaping and improvements within the designated portion of the Property (refer to Figure III.B-2 for the Proposed Project development site plan with the HCM designation area overlaid in red).

Compliance with the above-referenced Administrative Code sections is required in conjunction with Project implementation, as well compliance with Sections 12.21.A.12 and 17.05.R of the Los Angeles Municipal Code regarding “protected tree” regulations. Specifically, the Administrative Code states that any demolition, substantial alteration, or relocation of a Historic-Cultural Monument shall be referred to the Cultural Heritage Commission for review and approval before a permit is issued. As such, work associated with permits needed for alteration, removal, or relocation of the designated Coast Live Oaks and Sycamores

PARTIAL OF AERIAL PHOTO OF THE SITE



**PARTIAL SITE PLAN OF PROPOSED PROJECT**

The site plan shows a residential development with numerous numbered lots. The plan is divided into several sections labeled PARCEL A through PARCEL F. Key features include:

- Streets:** LA TUNA CANYON ROAD runs horizontally across the bottom. Other streets shown include "A" (28'), "B" (20'), "C" (20'), "D" (20'), "E" (20'), "F" (20'), "G" (20'), "H" (20'), "I" (20'), "J" (20'), "K" (20'), and "L" (20').
- Entrances:** ENTRANCE #1 and ENTRANCE #2 are marked near the bottom of the plan.
- Historic-Cultural Designation:** A red-outlined area in the lower right section is labeled "OUTLINE OF HISTORIC-CULTURAL DESIGNATION PURSUANT TO LOS ANGELES CITY COUNCIL MOTION 54A".
- Other Labels:** "3' DEDICATION", "NEW 45'", "EX. 42", "EX. 84", "CURB LINE", "LAS", "TUNJUNGA CANYON BOULEVARD", and "APN: 2572-023-023".

**Scale (Feet):** 0 60 120

**North Arrow:** NORTH

**Sheet Number:** 3-012



and any physical improvements located within the HCM designated area would, therefore, require referral to the Cultural Heritage Commission.

Pursuant to Motion 54A, a Historic Tuna Canyon Detention Station Working Group was convened and instructed to report back to the City Council within 60 days. On September 10, 2013, the City of Los Angeles prepared a “summary report on the working group for the site of the Tuna Canyon Detention Station.” [CF12-1625 – *Summary Report on the Working Group for the Site of the Tuna Canyon Detention Station, dated September 10, 2013, is attached hereto as Appendix I.*]

### ***Golf Course and Associated Uses***

According to the historic resources assessment report, building permits on file at the City of Los Angeles Department of Building and Safety and the Assessor records on file at the County of Los Angeles Office of the Assessor were reviewed to determine the history of construction and alterations for the Verdugo Hills Golf Course. The Verdugo Hills Golf Course was constructed in 1959. Norris Knaus was the architect, H.R. Little served as engineer, and William L. Hairston was the contractor. Very little information was available on any of these individuals. However, the AIA directory, the California Index, the Los Angeles Times, and various internet sources were thoroughly searched and none of these sources included a mention of the architect, builder or engineer. The first step in the process of building the course was the excavation of the land to accommodate the various holes. The previously level ground was cut and filled to create the undulating landscape winding into the foothills that characterizes the golf course today. The excavation work was carried out in the later summer and early fall of 1959, and was followed that winter by the construction of the clubhouse, equipment shed and parking lot near the southeast corner of the Subject Property.

Additionally, the land fronting Tujunga Canyon Boulevard was designated as the new driving range, surrounded by a 50 foot fence to prevent errant golf balls from interfering with traffic to the east or the course to the west. It appears that the Verdugo Hills Golf Course remained essentially untouched for the first twenty years of its existence. The shade cover structure was added over the center section of the driving range in 1980. An addition was made to the north elevation of the clubhouse in 1988 to accommodate additional snack bar seating. That same year a new sun shade was put up over the driving range. In 1989 the addition to the clubhouse was reduced in size and reframed. A second addition to the clubhouse was added on in 1991. In 1998 the original wood shake shingles on the clubhouse roof were removed and replaced with composite shingles, though it appears through site inspection that the shake shingles are still extant on the adjacent maintenance shed. In 2011, baskets were added to the course to create an eighteen hole disc (or Frisbee) golf course.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *Appendix G of the State CEQA Guidelines*

According to Checklist Questions V(a) through V(d) in Appendix G of the State CEQA Guidelines, a project may have a significant environmental impact if it were to:

- (a) Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?
- (b) Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?
- (c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- (d) Disturb any human remains, including those interred outside of formal cemeteries?

#### *City of Los Angeles CEQA Thresholds Guide*

The *L.A. CEQA Thresholds Guide* (2006, p. D.3-3) states that a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. A substantial adverse change in significance occurs if the project involves:

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

In addition to this guidance provided by the City of Los Angeles, the State Legislature, in enacting the California Register, also amended CEQA to clarify which properties are significant, as well as which project impacts are considered to be significantly adverse.

A project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment.<sup>3</sup> A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.<sup>4</sup>

The Guidelines go on to state that “[t]he significance of an historic resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources... local register of historic resources... or its identification in a historic resources survey.”<sup>5</sup>

## **Project Impacts**

### ***Tuna Canyon Detention Station***

The 1933-1946 events that took place on and around the Project Site are significant. While cultural fabric from the period of significance is gone, the landforms are remarkably intact and evoke strong memories and associations for local residents and former INS Tuna Canyon Detention Station detainees and their families. Local newspapers and the *Los Angeles Times* have published numerous articles on the CCC and INS camp occupancies (e.g. Kirka 1995a, 1995b; Hitt 2002, n.d.b), particularly after the National Archives and Records Administration declassified records of the detention station in 1998 (Scott 1942:1–5). Oral history projects of the Japanese American National Museum in Los Angeles have recorded memories of detainees at the INS station during World War II (e.g. Kaneko 1984) and personnel at the golf course (in 2005) report occasional visits from Japanese American families, relating stories of their 1940s experiences at this place.

Under the four Criteria for the National Register of Historic Places (A–D) and related Criteria for the California Register of Historical Resources (1–4), the property is best evaluated under Criterion A/1: association with New Deal's Civilian Conservation Corps and national policy for forest conservation on private lands, and with World War II national immigration and security policies and their impacts on Japanese Americans and deportee aliens, and Criterion D/4: potential to yield information on events and actions of the World War II Home Front that were little recorded and covertly performed, through U.S. policy and employees and through detainees held at Tuna Canyon Detention Station. The prime surviving resource at Tuna Canyon from the 1933–1946 period is the general landscape, retaining strong integrity of location and setting, somewhat lesser of feeling and association. However, all associated buildings and

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<sup>3</sup> CEQA Guidelines, Section 15064.5(b).

<sup>4</sup> CEQA Guidelines, Section 15064.5(b) (1).

<sup>5</sup> CEQA Guidelines, Section 15064.5(b)(2).

improvements have been removed, causing loss of integrity of materials, workmanship, and design, thus rendering the property ineligible for designation under national or California historical registers.

Because of the significance of events associated with the property, the SWCA Evaluator (in 2005) recommended commemoration of portions of the Project Site through designation as a California Historical Landmark (CHL). CHLs in the thematic landmark group "Temporary Detention Camps for Japanese Americans," are already designated as CHL No. 934 at Arcadia and Pomona in Los Angeles County (Office of Historic Preservation 2005). Such an additional designation was not intended to preserve the present resources at Verdugo Hills Golf Course, but to commemorate associated events through interpretation at the Project Site, to encourage sensitive development of the overall landscape, and to accommodate visitors to the Project Site through ease of parking, observation, and meditation. As a result of this study, portions of the Project Site were recorded as a historic resource with the State of California Office of Historic Preservation and assigned Primary Number 19-186980 by the South Central Coastal Information Center (SCCIC).

Pursuant to City Council Motion 54A mentioned above, a portion of the property with coast live Oaks and Sycamores was declared a Historic-Cultural Monument per Los Angeles Administrative Code Chapter 9, Division 22, Article 1, Section 22.171.7 *et seq.* The Proposed Project is affected by the City's Historic-Cultural Designation in that approximately seventeen (17) houses (identified by numbers 1, 2, and 20-34), three (3) internal roadways (identified by letters A, C, and D), approximately 100' of sidewalk, curb, and gutter along La Tuna Canyon Road, and common area landscaping and improvements are proposed to be located within the designated portion of the Property (please refer to Figure III.E-2 above for the Proposed Project development site plan overlaid with the HCM designation area in red). In addition, approximately twenty-two (22) existing trees (identified by numbers 75-83 and 251-263 on the May 2009 Tree Report, Appendix F-2 of the Original DEIR) are located within the designated area.

Pursuant to the Los Angeles Administrative Code and City permitting requirements, any permit that requires demolition, substantial alteration, or relocation of a Historic-Cultural Monument shall be referred to the Cultural Heritage Commission for review and approval before a permit is issued. *See* Los Angeles Administrative Code Chapter 9, Division 22, Article 1, Section 22.171.14. In addition, Sections 12.21.A.12 and 17.05.R of the Los Angeles Municipal Code include "protected tree" regulations for removal, relocation, and replacement of such trees. As such, work associated with permits needed for alteration, removal, or relocation of the designated Coast Live Oaks and Sycamores and existing physical improvements within the HCM designated area would, therefore, require referral to the Cultural Heritage Commission. The Project as proposed would have a significant impact on the historical resource mentioned above due to the configuration of homes and improvements proposed within the designated Historic-Cultural Monument area. Thus, mitigation would be necessary to reduce this impact to a less than significant level.



### ***Indian Camp***

This Indian Camp parcel was described in the 1947 *Montrose Ledger's* article as being the site of a former "Indian Camp". Additionally, ethnographic studies indicate that the Verdugo Hills area contained Native American villages. As discussed in Section IV.E.2, Archaeological Resources, there is the potential that unknown archaeological resources may be located below the surface of the Project Site. Since impacts to these resources would be unknown until encountered during excavation, impacts to such resources would potentially be considered significant if not mitigated. Thus, mitigation is required to reduce the potential for damage to any such resource located on the Project Site to a less than significant level. Please see Section IV.E-2 of the Original DEIR for further discussions.

### ***Golf Course and Associated Uses***

#### ***Integrity Analysis***

In accordance with the guidelines of the National Register of Historic Places, integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The property must retain the essential physical features that enable it to convey its historic identity. Furthermore, National Register Bulletin 15 states, "A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register." The California Register requires that a resource retain enough of its historic character or appearance to be recognizable as a historical resource and to convey the reasons for its significance.

In addition to the integrity recommendations provided at the national and state levels, eligibility standards are defined at the local level. SurveyLA outlines the required integrity that properties need in order to be eligible under historical themes and property types. In the case of the Golf Course property type, SurveyLA requires that a property retain integrity of feeling, setting, design, location, and association.

*Location* – The golf course, clubhouse, driving range, and associated features and outbuildings remain in their original locations and have never been relocated. Therefore, the Verdugo Hills Golf Course retains integrity of location.

*Design* – The design of the Verdugo Hills Golf Course has not been significantly altered. The original spatial arrangements between golf course, clubhouse, and driving range remain intact. The placement of each green and hole appears to be unchanged from the original 1959 configuration. Additionally, some original outdoor elements and landscape features such as log benches, original wood tee markers, and stone landscaping around flower beds and trees remains intact. The driving range maintains its original orientation, with customers hitting golf balls from the south end to the north end. The shelter over the center of the driving range was added in the 1980s, but this is a minor alteration. The majority of

alterations have occurred to the clubhouse, which was had two additions constructed on the rear elevation. However, these rear additions were incorporated into the existing structure by using the same board-and-batten siding and do not detract significantly from the original design. Therefore, the Verdugo Hills Golf Course retains integrity of design.

*Setting* – The setting around the Verdugo Hills Golf Course is largely intact. When initially constructed in 1959 the Subject Property was bordered by La Tuna Canyon Road to the south and Tujunga Canyon Boulevard to the east, and these roads remain in place. The Verdugo Mountains continue to be the primary view when standing on the Subject Property and facing south. To the north and west the Subject Property is bordered by foothills. Originally these hills were undeveloped but by 1972 some residential development had occurred on the tops of these hills north of the Golf Course. However, these houses are only partially visible from the Golf Course and are separated from it by the foothills. Therefore, the Verdugo Hills Golf Course retains integrity of setting.

*Materials* – Some materials within the Verdugo Hills Golf Course have been altered. In some cases, log benches and wood tee signs have been replaced with plastic benches and metal signs. Three windows on the east elevation of the Clubhouse have had their glazing removed and been painted over. The south elevation of the clubhouse is currently under construction and its board-and-batten siding has been removed and replaced with plywood. Presumably the plywood is a temporary alteration. Additionally, the roof of the clubhouse, which was originally covered with wood shake shingles, is now covered with composite shingles. However, the wood shake shingles are extant on the equipment shed. Therefore, the Verdugo Hills Golf Course retains partial integrity of materials.

*Workmanship* –As stated above, the materials of the Verdugo Hills Golf Course have been partially compromised, which also impacts the integrity of the workmanship. While most landscape features are intact, elements that display workmanship such as log benches and the original board-and-batten siding on the clubhouse have been partially replaced. Therefore, the Verdugo Hills Golf Course retains partial integrity of workmanship.

*Feeling* – The Verdugo Hills Golf Course retains integrity of location, design, and setting, as well as partial integrity of materials and workmanship. Additionally, the Verdugo Hills Golf Course is still in operation, continuing in its original function as a local par-three golf course. Taken together, these aspects contribute to the historic feeling of the Verdugo Hills Golf Course. Since the location, design, and setting, as well as part of the materials and workmanship, remain intact, the Subject Property is still able to convey its historic character. Therefore, the Verdugo Hills Golf Course retains integrity of feeling.

*Association* – The Verdugo Hills Golf Course continues in its original function as a par-three golf course and has never served any other purpose. Therefore, the Verdugo Hills Golf Course retains integrity of association.

Overall, the Verdugo Hills Golf Course is not an exceptional, distinctive, outstanding, or singular example of golf course design. While the course retains the basic features of a golf course, including tees,

fairways, and putting greens, it is a common type of course for this period and area and other, better examples are still extant and in use. Unlike the great courses of late 19th and early 20th century, the Verdugo Hills Golf Course is not based around a natural landscape. While most postwar golf courses rely on manmade features, the course lacks hazards and the routing of each of the fairways is simple and does not appear to vary much between holes. The course is one of many functional, profit-based courses designed to attract and sustain an amateur clientele in postwar suburban Los Angeles. Similarly, the clubhouse is not a particularly notable example of the Ranch Style applied to a commercial building and has also lost some of its historic integrity.

Additionally, the Verdugo Hills Golf Course is not the work of a master architect or builder. The building permits identify H.R. Little as the engineer, Norris Knaus as the architect, and William L. Hairston as the contractor of the original Verdugo Hills Golf Course, including the clubhouse. No additional information was available on H.R. Little, indicating he is not a significant engineer. Norris Knaus is listed in the 1940 U.S. Federal Census as an architect in Glendale. What's more, Knaus is not listed in the AIA Directory. William L. Hairston appears to have been an amateur golfer and may have coached golf briefly at the University of California Irvine. However, Hairston does not appear to be significant either as a golfer or a builder of golf courses, and there is no indication he ever worked on another golf course apart from the Verdugo Hills Golf Course.

Therefore, the Verdugo Hills Golf Course does not meet National Register Criterion C, California Register Criterion 3, or the local register for eligibility related to a distinctive type, method, or period of construction, or as a work of a master.

### *Conclusion*

The Verdugo Hills Golf Course appears ineligible for listing under any federal, state or local eligibility criteria. The Subject Property is not associated with historic events or personages, is not an excellent example of golf course design, and is not the work of a master golf course or landscape architect. As a result of these investigations, the Verdugo Hills Golf Course is assigned a California Historical Resource Status Code of 6Z, found ineligible for National Register, California Register or local designation through survey evaluation.

Therefore, the Project would have no direct or indirect impacts to historical resources on the Project Site. The Project does not materially impair the integrity or significance of other historical resources in the Project vicinity, as there are no historical resources with a view of the Project and the mitigation measures outlined in this RP-DEIR and the Original DEIR ensure that any impact to the Historic Cultural Monument on the Project Site would be less than significant. Therefore, indirect impacts to the historic resources in the Project vicinity is considered less than significant and no mitigation measures are required.

## MITIGATION MEASURES

### *Tuna Canyon Detention Station*

The following mitigation measure was initially recommended to reduce potential impacts associated with the Tuna Canyon Detention Station:

- E.1-1** “Because of the significance of events associated with the property, commemoration of the site through designation as a California Historical Landmark (CHL) in the thematic landmark group “Temporary Detention Camps for Japanese Americans,” is recommended. Such an additional designation is not intended to preserve the present resources at Verdugo Hills Golf Course, but to commemorate associated events through interpretation at the site, to encourage sensitive development of the overall landscape, and to accommodate visitors to the site through ease of parking, observation, and meditation.”

Since the preparation of the initial Original DEIR, a portion of the Proposed Project Site was designated a Historic-Cultural Monument in 2013 by the City of Los Angeles. The local designation goes further than the previously recommended mitigation measure in that it requires physical preservation of the monument with very limited exceptions. No permit for the demolition, substantial alteration or relocation of any Monument can be issued, and no Monument can be demolished, substantially altered or relocated without first referring the matter to the Commission, except where the Superintendent of Building or the City Engineer determines that demolition, relocation or substantial alteration of any Monument is immediately necessary in the interest of the public health, safety or general welfare.

(Please refer to Figure III.B-1 for an aerial photograph of the Project Site with the Working Group plan overlaid in green and Figure III.B-2 for an illustration of the Proposed Project development site plan overlaid with the Working Group plan in green.)

In light of the Working Group recommendation, the following mitigation measures are recommended to reduce potential impacts:

- E.1-1** The Proposed Project shall comply with the Secretary of the Interior’s Standards for Rehabilitation (“Standards”) to ensure that future construction activities involving the HCM designated one-acre site are regulated in accordance with Section 22.171.14 of the City of Los Angeles Administrative Code (“LAAC”). The Applicant shall comply with the Cultural Heritage Commission’s (“Commission”) determination on the approval of a permit for the substantial alteration, or a permit for the demolition or removal, of a Monument in compliance with Subsections (a) and (b), respectively, of Section 22.171.14 of the LAAC. A qualified preservation consultant shall review the Proposed Project for conformance with the Standards and prepare a plan review commenting on the Proposed Project for submittal to the Commission for their review and approval. A qualified architectural historian, historical archaeologist or historic preservation professional who satisfies the Secretary of the Interior’s Professional Qualification

Standards for History, Archaeology, or Architectural History pursuant to 36 CFR 61, shall prepare the plan review.

**E.1-2** The Proposed Project shall comply with Section 17.05R of the Los Angeles Municipal Code for Protected Trees to ensure no protected tree on the Project Site would be replaced or removed except as provided in Article 6 of Chapter IV of the Los Angeles Municipal Code. Further compliance with Section 17.05R requires review by the Advisory Agency, in consultation with the City's Chief Forester, to remove or relocate a protected tree and any tree officially designated a Historical Monument. A qualified preservation consultant who specializes in cultural landscapes shall review the Proposed Project for conformance with the Secretary of Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes and prepare a plan review commenting on the Proposed Project for submittal to the Commission for their review and approval.

**E.1-3** As a result of the City of Los Angeles Historic-Cultural Monument (HCM) designation of a portion of the Project Site, further commemoration of the historic use shall be accomplished with implementation of the September 10, 2013 Working Group recommended site plan, subject to City approval. Implementation of the commemoration set forth by the September 10, 2013 Working Group site plan would ensure the significant events associated with the former Tuna Canyon Detention Station are preserved. The implementation of this commemoration plan would result in adverse impacts to the HCM designated one-acre site; therefore, a qualified preservation consultant shall review the Proposed Project for conformance with the Standards and prepare a plan review commenting on the Proposed Project for submittal to the Commission for their review and approval in accordance with Section 22.171.14 of the LAAC.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

### ***Tuna Canyon Detention Station***

On June 25, 2013, the City Council adopted Motion 54A which, in part, declared a "...portion of the property located at 6433 West La Tuna Canyon Road (Assessor Parcel No. 2572021020) with Coast Live Oaks and Sycamores, as depicted on the attached map (labeled Exhibit A), a Historic-Cultural Monument per Los Angeles Administrative Code Chapter 9, Division 22, Article 1, Section 22.171.7." As stated above, commemoration of the historic Tuna Canyon Detention Station use shall be accomplished with implementation of the September 10, 2013 Working Group recommendation (Mitigation Measure E.1-3). Thus, compliance with the above identified regulatory compliance and mitigation measures would reduce potential impacts to a less than significant level.

### ***Indian Camp***

Because no known unique archaeological resources would be affected by the Proposed Project, impacts are expected to be less than significant. However, because there is the potential that unknown resources

could be encountered during the course of Project development, implementation of the recommended mitigation measures in Section IV.E.2 of the Original DEIR (Mitigation Measures E.2-1 through E.2-3) would ensure that no significant impacts to a unique archaeological resource would occur. Thus, strict compliance with these mitigation measures would reduce impacts to a less than significant level.

## **CUMULATIVE IMPACTS**

Implementation of the Proposed Project in combination with the related projects in the Project vicinity would result in the continued development, or redevelopment, in the general Project area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. While the extent of cultural resources, if any, which occur at the related project sites is unknown, implementation of standard cultural resource mitigation measures (i.e., review of historic resource databases, protection and preservation plans, etc.) would reduce potential impacts at the related project sites to less than significant levels. For example, the potential that one or more of these related projects might encounter historic cultural resources during the course of development is determined by such factors as whether cultural resource strata exists at any given related project site and the type of proposed development activities at that site as it relates to existing historic resource structures or events. However, not all cultural resources are of equal scientific value. Considering that the discovery of cultural resources (or historic resource event) is a fairly rare event, it is not anticipated that there would be a significant adverse cumulative impact to cultural resources. If the potential exists, the related projects would incorporate the necessary mitigation measures to reduce potential impacts. Thus, cumulative impacts are expected to be less than significant.

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### **III. ENVIRONMENTAL IMPACT ANALYSIS**

#### **C. TRANSPORTATION/TRAFFIC**

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##### **INTRODUCTION**

The following summarizes the information provided in the traffic report prepared by Linscott, Law & Greenspan, titled Traffic Impact Study for the Verdugo Hills Residential Project, City of Los Angeles, California, and dated June 8, 2015. The information below is also based on a Los Angeles Department of Transportation (LADOT) inter-departmental approval letter, dated September 17, 2015. The traffic report and LADOT approval letter are included as Appendices E and F to this Recirculated Portions of the Draft EIR (RP-DEIR).

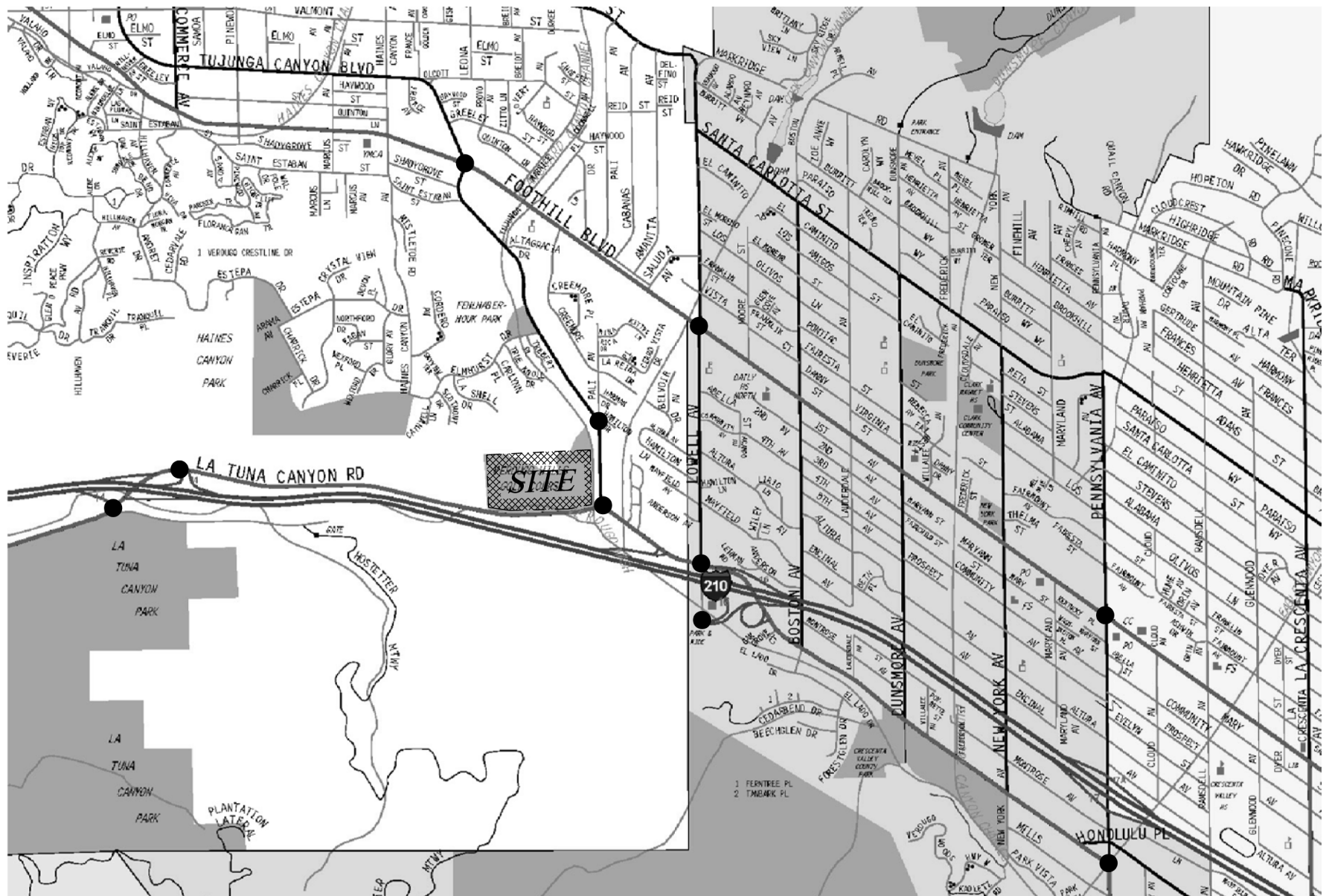
The proposed development consists of 229 single-family detached housing units. Additionally, the Traffic Impact Study also analyzed a proposed development of 221 single-family detached housing units, identified as Alternative 6, Preferred Project Alternative, in this RP-DEIR. Currently, the Project Site is occupied by the Verdugo Hills Golf Course and a driving range with tee stations east of the golf course. In addition to the Proposed Project of 229 single-family detached housing units, the Traffic Impact Study also analyzed three project scenarios that varied based on credit for the existing uses. Scenario 1 assumed both the golf course and driving range were eligible for existing use credit. Scenario 2 assumed existing credit was given for the driving range and no existing credit for the golf course. Scenario 3 assumed no credit for any existing uses and the development of 229 single-family detached housing units. Scenario 1 represents the current situation at the Project Site, and thus, will be analyzed below.

##### **ENVIRONMENTAL SETTING**

The Project Site is located at 6433 La Tuna Canyon Road and is situated at the northwest corner of the Tujunga Canyon Boulevard/La Tuna Canyon Road intersection in the Sunland-Tujunga area of the City of Los Angeles. The Site is bounded by single-family residences and open space to the north and west, La Tuna Canyon Road to the south, and the Verdugo Wash and Tujunga Canyon Boulevard to the east.

As mentioned above, the existing Project Site is currently occupied by the 18-hole, par 3 Verdugo Hills Golf Course and a driving range with tee stations east of the golf course. The existing uses on the Project Site will be removed to accommodate the Proposed Project. Additionally, to the north of the golf course there are approximately 30 acres of undeveloped open space that would remain as open space.

The general location of the Project Site in relation to the study locations and surrounding street system is presented in Figure III.C-1, Vicinity Map. The traffic analysis study area is generally comprised of those locations which have the greatest potential to experience significant traffic impacts due to the Proposed Project as defined by the Lead Agency.



MAP SOURCE: RAND MCNALLY & COMPANY

● STUDY INTERSECTION

Source: Linscott, Law & Greenspan, Engineers.

CAJA Environmental Services, LLC

Figure III.C-1  
Vicinity Map



## Existing Street System

### *Regional Highway System*

Regional access to the Project Site is provided by the Interstate 210 (Foothill) Freeway. Freeway ramps are provided at Honolulu Avenue, Lowell Avenue, and La Tuna Canyon Road in the project vicinity. A brief description of the I-210 Freeway is provided in the following paragraph.

I-210 (Foothill) Freeway is an east-west oriented freeway that extends from the City of Rialto to the State Route 134 Freeway in the City of Pasadena. It continues in a southeast-northwest alignment from the City of Pasadena to the I-5 Freeway in Sylmar. In the project vicinity, four mainline travel lanes plus auxiliary lanes are generally provided in each direction on the I-210 Freeway. Eastbound and westbound on and off-ramps are provided on the I-210 Freeway at La Tuna Canyon Road. Westbound on and off-ramps and eastbound on-ramps are provided on the I-210 Freeway at Honolulu Avenue. Eastbound on and off-ramps are provided on the I-210 Freeway at Lowell Avenue.

### *Local Roadway System*

Immediate access to the Project Site is accommodated via La Tuna Canyon Road and Tujunga Canyon Boulevard. As detailed in the Traffic Impact Study for this RP-DEIR, this examination analyzes the same ten study intersections from the previous Traffic Impact Study for the Original DEIR. The following ten study intersections were selected based on their proximity to the Project Site, and in consultation with LADOT, City of Glendale, and County of Los Angeles staffs, in order to determine potential impacts related to the Proposed Project:

1. I-210 Freeway Eastbound Off-Ramp / La Tuna Canyon Road (City of Los Angeles)
2. I-210 Westbound Ramps / La Tuna Canyon Road (City of Los Angeles)
3. Tujunga Canyon Boulevard / Foothill Boulevard (City of Los Angeles)
4. Tujunga Canyon Boulevard / Pali Avenue (City of Los Angeles)
5. Tujunga Canyon Boulevard / La Tuna Canyon Road – Honolulu Avenue (City of Los Angeles)
6. Lowell Avenue / Foothill Boulevard (City of Los Angeles, City of Glendale)
7. Lowell Avenue / Honolulu Avenue (City of Glendale)
8. Lowell Avenue / I-210 Freeway Eastbound Ramps (City of Glendale)
9. Pennsylvania Avenue / Foothill Boulevard (City of Glendale, County of Los Angeles)
10. Pennsylvania Avenue / Honolulu Avenue (City of Glendale)

It should be noted that study intersections 3, 5, 6, 7, 9, and 10 are presently controlled by traffic signals. The remaining four study intersections 1, 2, 4, and 8 are presently stop-sign controlled. As noted above, study intersection numbers 1 through 5 are located within the City of Los Angeles and the remaining five

study intersections (study intersection numbers 6 through 10) are located within the City of Glendale, or shared between the three referenced agencies.

The Critical Movement Analysis (CMA) method of analysis that determines Volume-to-Capacity (v/c) ratios on a critical lane basis. The critical lanes are determined based on a volume (or combination of volumes) for a given street which produces the greatest utilization of capacity (e.g., needs the greatest green time) for that street. The volume(s) for the critical lanes are given in terms of the number of vehicles per hour per lane.<sup>1</sup> The CMA method is required for use by LADOT based on the City of Los Angeles traffic study guidelines. As previously mentioned, five of the ten study intersections are located outside the City of Los Angeles (i.e., shared jurisdiction between the City of Los Angeles, City of Glendale, and County of Los Angeles; or located solely within the City of Glendale).

### ***Public Transit Services***

Public bus transit service in the project study area is currently provided by the Los Angeles County Metropolitan Transportation Authority and the City of Los Angeles Department of Transportation. Specifically, LADOT Route 409 Commuter Express and Metro Route 90/91 provide public transit opportunities near Tujunga Canyon Boulevard and Foothill Boulevard.

### ***Existing Site Access and Operations***

Regional access to the Project Site is provided by the I-210 freeway. Local access is via La Tuna Canyon Road and Tujunga Canyon Boulevard. The existing Project Site is located on the north side of La Tuna Canyon Road, west of Tujunga Canyon Boulevard and vehicular access to the existing golf course and driving range is provided via two driveways on the north side of La Tuna Canyon Road, west of La Tuna Canyon Road-Honolulu Avenue. The easterly site driveway on La Tuna Canyon Road is one-way, inbound only. Conversely, the westerly site driveway on La Tuna Canyon Road is one-way, outbound only.

### ***Existing Traffic Volumes***

Manual traffic counts of vehicular turning movements were conducted at the study intersections listed above during the weekday morning and afternoon commuter periods to determine the peak hour traffic volumes. The manual traffic counts at the study intersections were conducted to determine the AM and PM peak commuter peak hour traffic volumes.

Specifically, counts were conducted at the following two intersections on October 15, 2013, during the weekday AM and PM peak commuter hours:

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<sup>1</sup> Source: Transportation Research Circular, Number 212, January 1980 (ISSN 0097-8515); Transportation Research Board (Washington, D.C.).

1. I-210 Freeway EB Off-Ramp / La Tuna Canyon Road
2. I-210 Freeway WB Ramps / La Tuna Canyon Road

Similarly, counts were conducted at the following five intersections on November 13, 2012, during the weekday AM and PM peak commute hours:

3. Tujunga Canyon Boulevard / Foothill Boulevard
5. Tujunga Canyon Boulevard / La Tuna Canyon Road – Honolulu Avenue
6. Lowell Avenue / Foothill Boulevard
7. Lowell Avenue / Honolulu Avenue
8. Lowell Avenue / I-210 Freeway Eastbound Ramps

Using this data, along with the count data collected during analysis of the Original DEIR volumes were estimated at Intersection No. 4 Tujunga Canyon Boulevard / Pali Avenue. For Intersection No. 9 Pennsylvania Avenue / Foothill Boulevard and Intersection No. 10 Pennsylvania Avenue / Honolulu Avenue, count data collected during analysis of the Original Project on February 5, 2008, was used to estimate Year 2014 traffic volumes.

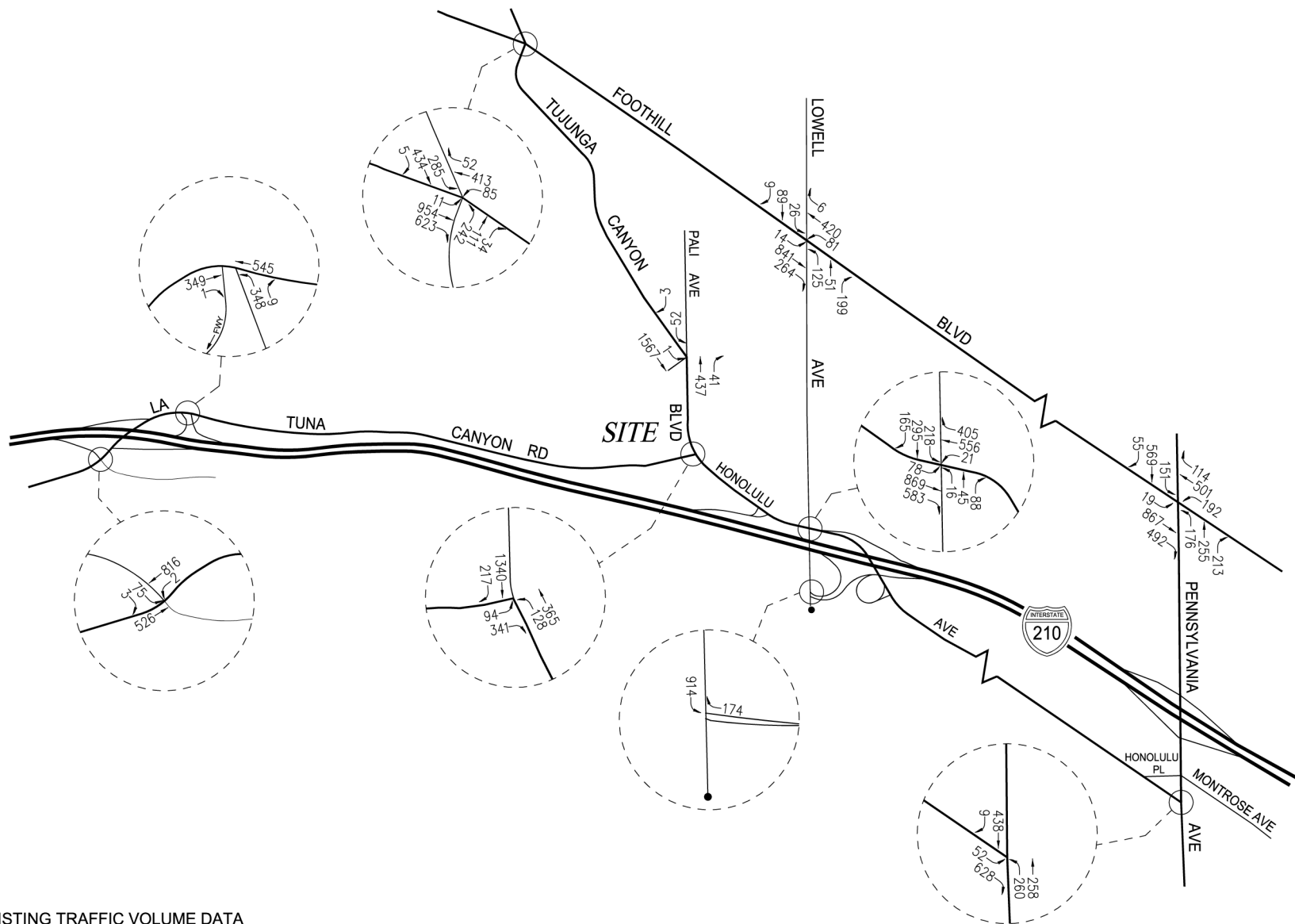
In order to determine the Existing Year 2014 traffic volumes, all traffic volumes (i.e., data collected in 2008, 2012 and 2013) were increased at an annual rate of 2.0 percent (2.0%) per year to the year 2014. Application of an annual growth rate takes into account the passage of time as well as general traffic growth within the project vicinity. Further discussion of the ambient growth rate is discussed below.

It is noted that the count data collected in 2012 at five of the study intersections adjacent to the Project Site were evaluated to determine the general traffic growth between 2008 and 2012. As shown in Table A contained in Appendix E to this RP-DEIR, the aggregate weekday AM peak hour traffic volumes are 13% lower in 2012 as compared to the 2008 traffic volumes. Similarly, the weekday PM peak hour traffic volumes are 3% lower in 2012 as compared to the 2008 traffic volumes. Therefore, use of a 2.0% annual growth rate to convert 2008, 2012, and 2013 traffic counts to 2014 “Existing” volumes is highly conservative (“worst case”).

The weekday AM and PM peak period manual counts of vehicle movements at the study intersections are summarized in Table III.C-1, Existing Traffic Volumes, below. The existing traffic volumes at the study intersections during the weekday AM and PM peak hours are shown in Figures III.C-2 and III.C-3, respectively. Summary data worksheets of the manual traffic counts at the study intersections are contained in Appendix E to this RP-DEIR.

**Table III.C-1  
Existing Traffic Volumes**

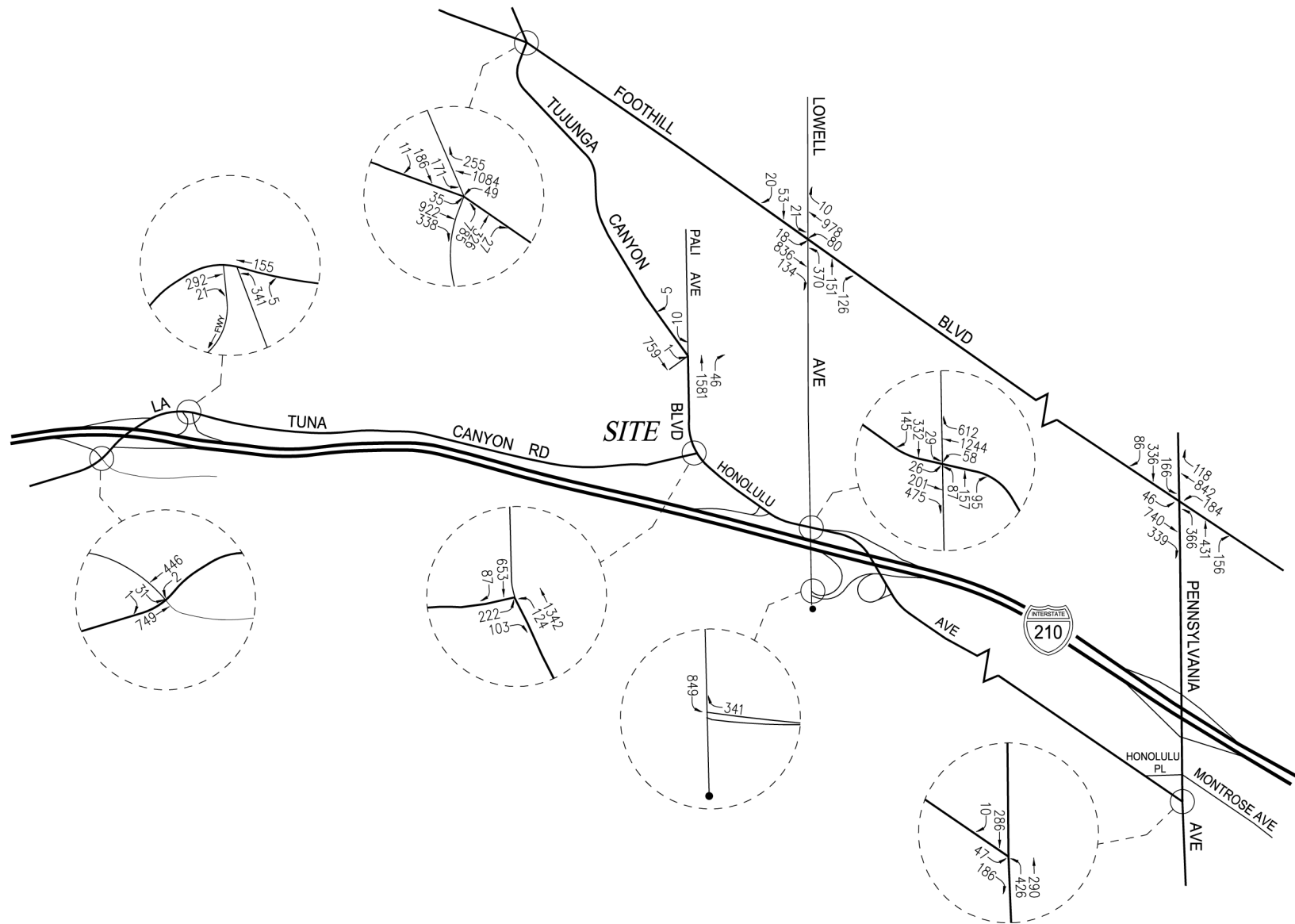
No.	Intersection	Date	Dir	AM Peak Hour		PM Peak Hour	
				Began	Volume	Began	Volume
1	I-210 Freeway EB Off-Ramp/ La Tuna Canyon Road <sup>1</sup>	10/15/2013	NB SB EB WB	7:30	0 80 537 834	4:45	0 32 749 448
2	I-210 Freeway WB On-Off Ramps/ La Tuna Canyon Road <sup>1</sup>	10/15/2013	NB SB EB WB	7:45	350 0 343 534	3:45	339 0 307 152
3	Tujunga Canyon Boulevard/ Foothill Boulevard <sup>1</sup>	11/13/2012	NB SB EB WB	7:45	373 696 1,527 529	5:00	1,093 354 1,246 1,334
4	Tujunga Canyon Boulevard/ Pali Avenue <sup>1</sup>	11/13/2012	NB SB EB WB	7:15	478 1,568 0 55	4:45	1,627 760 0 15
5	Tujunga Canyon Boulevard/ La Tuna Canyon Road-Honolulu Avenue <sup>1</sup>	11/13/2012	NB SB EB WB	7:15	474 1,497 418 0	4:45	1,409 712 312 0
6	Lowell Avenue/ Foothill Boulevard <sup>1</sup>	11/13/2012	NB SB EB WB	7:45	360 120 1,076 486	4:30	622 90 950 1,027
7	Lowell Avenue/ Honolulu Avenue <sup>1</sup>	11/13/2012	NB SB EB WB	7:30	143 653 1,472 944	4:30	326 486 675 1,840
8	Lowell Avenue/ I-210 Freeway EB Ramps <sup>1</sup>	11/13/2012	NB SB EB WB	7:00	0 879 0 167	4:30	0 816 0 328
9	Pennsylvania Avenue/ Foothill Boulevard <sup>2</sup>	02/05/08	NB SB EB WB	7:30	0 575 692 1,230	3:00	0 851 525 1,005
10	Pennsylvania Avenue/ Honolulu Avenue <sup>2</sup>	02/05/08	NB SB EB WB	7:30	0 462 399 607	5:00	0 639 264 213
<sup>1</sup> Counts conducted by City Traffic Counters.							
<sup>2</sup> Counts conducted by National Data & Surveying Services							



NOTE: ALL EXISTING TRAFFIC VOLUME DATA  
FACTORED TO YEAR 2014 BASELINE CONDITIONS

Source: Linscott, Law & Greenspan, Engineers.





NOTE: ALL EXISTING TRAFFIC VOLUME DATA  
FACTORED TO YEAR 2014 BASELINE CONDITIONS

Source: Linscott, Law & Greenspan, Engineers.



## Cumulative Development Projects

### *Related Projects*

A forecast of on-street traffic conditions prior to occupancy of the Project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area. With this information, the potential impact of the Proposed Project can be evaluated within the context of the cumulative impact of all ongoing development.

Traffic volumes expected to be generated by the related projects were calculated using rates provided in the ITE *Trip Generation* manual. The related projects respective traffic generation for the AM and PM peak hours, as well as on a daily basis for a typical weekday, is summarized in Table III.C-2, Related Projects Trip Generation, below. The location of the related projects in the Project Site area is presented in Figure III.C-4, Location of Related Projects, below.

### *Ambient Traffic Growth Factor*

In order to account for unknown related projects not included in this analysis, the existing traffic volumes were increased at an annual rate of two percent (2.0%) per year to the year 2016 (i.e., the anticipated year of project build-out). The ambient growth factor was based on general traffic growth factors provided in the 2010 *Congestion Management Program for Los Angeles County* (the “CMP manual”) and determined in consultation with LADOT staff. It is noted that based on review of the general traffic growth factors provided in the CMP manual for the San Fernando Valley area, it is anticipated that the existing traffic volumes are expected to increase at an annual rate of less than 0.3% per year between the years 2010 and 2015. Thus, application of this annual growth factor allows for a conservative, worst case forecast of future traffic volumes in the area.

**Table III.C-2**  
**Related Projects Trip Generation [1]**

Map No.	Land Use	Size	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
				In	Out	Total	In	Out	Total
1	Canyon Hills Residential [3] 800 La Tuna Canyon Road	221 DU	2,115	42	124	166	140	83	223
2	Foothill Commerce Town Center [4]	26,500 GSF	1,138 (570)	17 (9)	11 (6)	28 (15)	48 (24)	52 (26)	100 (50)
		10,250 GSF	1,336 (268)	49 (10)	49 (10)	95 (19)	67 (13)	45 (9)	112 (22)
3	Canyon Park Homes [5]	242 DU	2,304	46	136	182	152	90	242
<b>TOTAL</b>			<b>6,055</b>	<b>135</b>	<b>302</b>	<b>437</b>	<b>370</b>	<b>235</b>	<b>605</b>

Map No.	Land Use	Size	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
				In	Out	Total	In	Out	Total
<i>[1] Sources: City of Los Angeles, Department of Transportation.</i>									
<i>[2] Trips are one-way traffic movements, entering or leaving.</i>									
<i>[3] Canyon Hills Project Traffic Impact Study, LLG Engineers, March 2003.</i>									
<i>[4] Foothill Commerce Town Center Project, LLG Engineers, April 2004.</i>									
<i>[5] Big Tujunga Villas Project Traffic Impact Study, LLG Engineers, June 2014.</i>									

## ENVIRONMENTAL IMPACTS

### Project Design Features

Although not required to mitigate any significant impacts, the Applicant has agreed to the following Project Design Feature (PDF) as a condition of approval for the Proposed Project:

**PDF-1** The Proposed Project will install a new traffic signal at the currently unsignalized intersection of Tujunga Canyon Boulevard and Pali Avenue/Hamilton Drive as part of the project description. The signal design shall include Hamilton Drive as part of the signalized intersection. Additionally, southbound and northbound left-turn pockets of sufficient length on Tujunga Canyon Boulevard shall be provided to the satisfaction of LADOT. These requirements may involve additional required improvements and re-striping on Tujunga Canyon Boulevard, Hamilton Avenue and Pali Avenue.

The applicant shall be responsible for the signal design and installation. Detailed proposed signal plans are required to be submitted to DOT for review prior to final approval. This improvement shall be guaranteed and completed through the B-Permit process of the Bureau of Engineering, Department of Public Works.

### Thresholds of Significance

Traffic impacts would be considered significant if the Proposed Project:

- a) Caused an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections);
- b) Exceeded, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways;



- c) Resulted in a change in air traffic patterns, including either an increase in traffic levels or change in location that results in substantial safety risks;
- d) Substantially increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- e) Resulted in inadequate emergency access;
- f) Resulted in inadequate parking capacity; or
- g) Conflicted with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

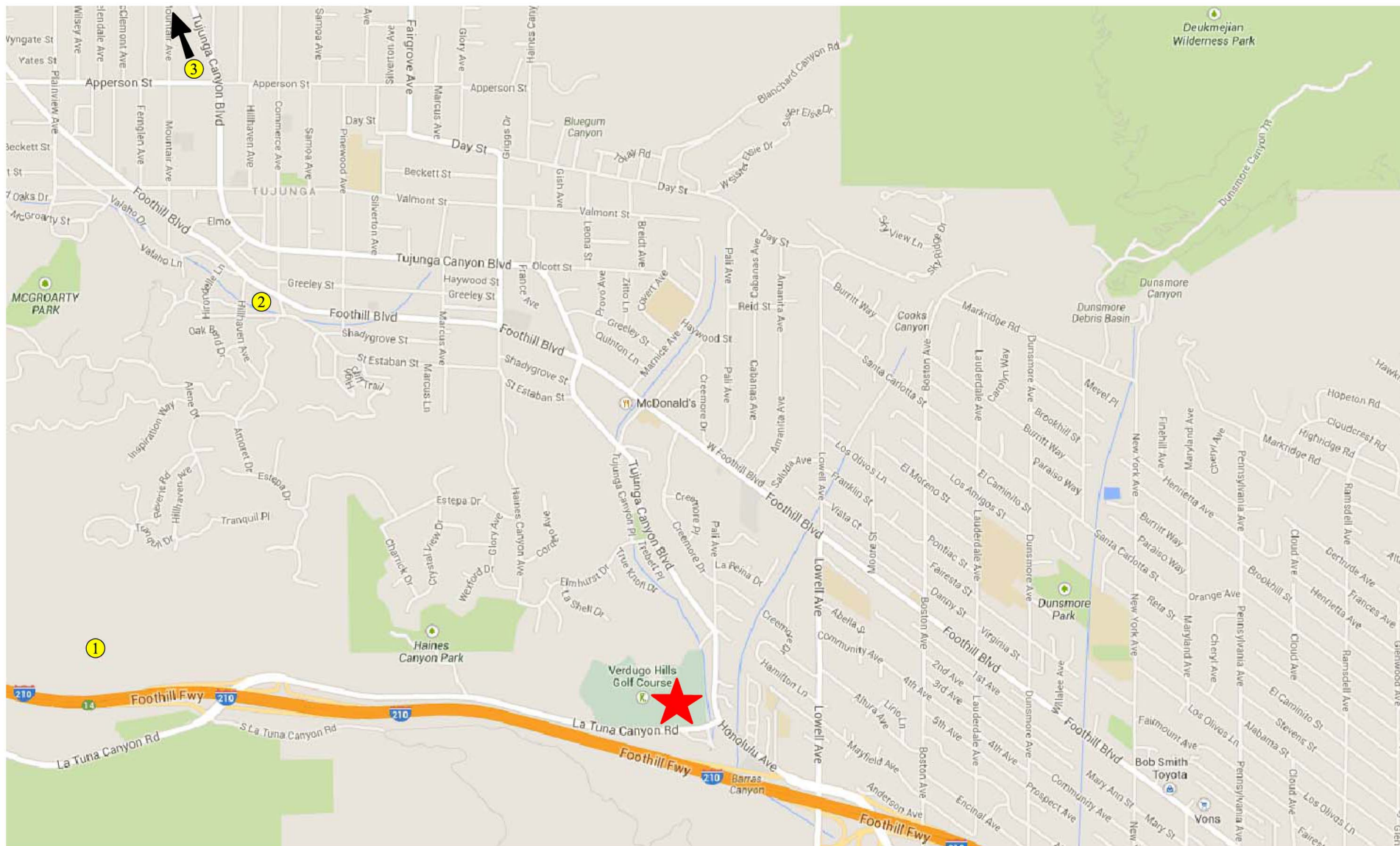
As the City of Los Angeles is the Lead Agency for the Proposed Project, each study intersection was evaluated for potential traffic impacts using the LADOT significant traffic impact thresholds. Additionally, each intersection located partially or solely within the City of Glendale and the unincorporated County of Los Angeles was evaluated on a supplementary basis using the significant traffic impact criteria utilized by the respective jurisdiction.

## **Methodology**

The ten study intersections were evaluated using the Critical Movement Analysis (CMA) method of analysis that determines Volume-to-Capacity ( $v/c$ ) ratios on a critical lane basis. The CMA method is required for use by LADOT based on the City of Los Angeles traffic study guidelines. As previously mentioned, five of the ten study intersections are located outside the City of Los Angeles (i.e., shared jurisdiction between the City of Los Angeles and City of Glendale or located solely within the City of Glendale).

In addition to the traffic analysis using LADOT CMA methodology, a supplemental traffic analysis was prepared using the Intersection Capacity Utilization (ICU) method for the five study intersections located partially or entirely within the City of Glendale. Specifically, the ICU method was used to determine Volume-to-Capacity ratios and corresponding Levels of Service at the study intersections located outside of the City of Los Angeles as the ICU method is used for traffic analysis purposes in that jurisdiction.

For both the CMA and ICU methodologies, the overall intersection  $v/c$  ratio is subsequently assigned a Level of Service (LOS) value to describe intersection operations. Level of Service varies from LOS A (free flow) to LOS F (jammed condition). Descriptions of the CMA and ICU methods and corresponding Levels of Service are provided in Appendix C and Appendix D, respectively, of the Updated Traffic Impact Study, which is identified as Appendix E to this RP-DEIR.



PROJECT SITE



LOCATION OF RELATED PROJECT

Source: Linscott, Law & Greenspan, Engineers.



### ***City of Los Angeles Analysis Methodology***

The significance of the potential impacts of project generated traffic at the ten study intersections was identified using criteria set forth in the LADOT's *Traffic Study Policies and Procedures* document. According to the City's Sliding Scale Method for calculating the level of impact due to traffic generated by the Proposed Project, a significant transportation impact is determined based on the sliding scale criteria presented in Table III.C-3, City of Los Angeles Intersection Impact Threshold Criteria, below.

**Table III.C-3  
City of Los Angeles  
Intersection Impact Threshold Criteria**

<b>Final <math>v/c</math></b>	<b>Level of Service</b>	<b>Project Related Increase in <math>v/c</math></b>
> 0.700 - 0.800	C	equal to or greater than 0.040
> 0.800 - 0.900	D	equal to or greater than 0.020
>0.900	E or F	equal to or greater than 0.010

The City's Sliding Scale Method requires mitigation of project traffic impacts whenever traffic generated by the proposed development causes an increase of the analyzed intersection  $v/c$  ratio by an amount equal to or greater than the values shown above.

### ***City of Glendale Analysis Methodology***

For the five intersections located partly or solely within the City of Glendale, the relative impact of the added Project traffic volumes generated by the Proposed Project during the AM and PM peak hours was also evaluated based on analysis of existing and future operating conditions, without and with the Proposed Project. The previously discussed ICU capacity analysis procedures were utilized to investigate the future volume-to-capacity relationships and service level characteristics at each of the five study intersections. The significance of the potential impacts of the Project generated traffic at each key intersection was then evaluated using the threshold criteria provided by the City of Glendale Traffic and Transportation Division staff. According to the City's criteria for calculating the level of impact due to traffic generated by the Proposed Project, a significant transportation impact is determined based on the criteria presented in Table III.C-4, City of Glendale Intersection Impact Threshold Criteria, below.

**Table IV.N-4  
City of Glendale  
Intersection Impact Threshold Criteria**

<b>Final <math>v/c</math></b>	<b>Level of Service</b>	<b>Project Related Increase in <math>v/c</math></b>
> 0.800	D, E, or F	equal to or greater than 0.020

The City's methodology requires mitigation of project traffic impacts whenever traffic generated by the proposed development causes an increase of the analyzed intersection  $v/c$  ratio by an amount equal to or greater than the values shown above.

#### ***LADOT ATSAC/ATCS***

The City of Los Angeles Automated Traffic Surveillance and Control (ATSAC) and Adaptive Traffic Control System (ATCS) provides computer control of traffic signals allowing automatic adjustment of signal timing plans to reflect changing traffic conditions, identification of unusual traffic conditions caused by accidents, the ability to centrally implement special purpose short term traffic timing changes in response to incidents, and the ability to quickly identify signal equipment malfunctions. ATCS provides real time control of traffic signals and includes additional loop detectors, closed-circuit television, an upgrade in the communications links and a new generation of traffic control software. LADOT estimates that the ATSAC system reduces the critical  $v/c$  ratios by seven percent (0.07). The ATCS system upgrade further reduces the critical  $v/c$  ratios by three percent (0.03) for a total of 10 percent (0.10). According to the City of Los Angeles, ATSAC/ATCS system upgrades for the signalized study intersections have been implemented. As such, the Level of Service calculations reflect a 0.10 adjustment for all analysis scenarios evaluated.

#### **Project Impacts**

The Proposed Project consists of the development of 229 single-family detached housing units. The Project will also provide a substantial amount of open space, including linear green space in the westerly and northerly portions of the Project Site. Vehicular access to the Proposed Project is planned to be provided via two private driveways located on La Tuna Canyon Road.

#### ***Project Traffic Generation***

As presented in Table III.C-5, Project Trip Generation Summary, below, the Proposed Project is expected to generate a net increase of 124 vehicle trips (7 inbound trips and 117 outbound trips) during the AM peak hour. During the PM peak hour, the Proposed Project is expected to generate 141 net new vehicle trips (101 inbound trips and 40 outbound trips). Over a 24-hour period, Scenario 1 is forecast to generate

a net increase of 1,155 daily trip ends (577 inbound trips and 578 outbound trips) during a typical weekday.

**Table III.C-5**  
**Project Trip Generation Summary<sup>[1]</sup>**

LAND USE	SIZE	DAILY TRIP ENDS [2] VOLUMES	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
			IN	OUT	TOTAL	IN	OUT	TOTAL
<i>Proposed Project</i> Single-Family Detached Housing [3]	229 DU	2,180	43	129	172	144	85	229
<b>Subtotal Proposed Project</b>		<b>2,180</b>	<b>43</b>	<b>129</b>	<b>172</b>	<b>144</b>	<b>85</b>	<b>229</b>
<i>Existing Uses</i> Golf Course [4] Driving Range [5]	18 Holes 28 Tees	(643) (382)	(29) (7)	(8) (4)	(37) (11)	(27) (16)	(26) (19)	(53) (35)
<b>Subtotal Exiting</b>		<b>(1,025)</b>	<b>(36)</b>	<b>(12)</b>	<b>(48)</b>	<b>(43)</b>	<b>(45)</b>	<b>(88)</b>
<b>Net Increase</b>		<b>1,155</b>	<b>7</b>	<b>117</b>	<b>124</b>	<b>101</b>	<b>40</b>	<b>141</b>
<p>[1] Source: ITE "Trip Generation", 9th Edition, 2012.</p> <p>[2] Trips are one-way traffic movements, entering or leaving.</p> <p>[3] ITE Land Use Code 210 (Single-Family Detached Housing) trip generation average rates.</p> <ul style="list-style-type: none"> <li>- Daily Trip Rate: 9.57 trips/DU; 50% inbound/50% outbound</li> <li>- AM Peak Hour Trip Rate: 0.75 trips/DU; 25% inbound/75% outbound</li> <li>- PM Peak Hour Trip Rate: 1.01 trips/DU; 63% inbound/37% outbound</li> </ul> <p>[4] ITE Land Use Code 430 (Golf Course) trip generation average rates.</p> <p>[5] ITE Land Use Code 432 (Golf Driving Range) trip generation average rates.</p>								

The levels of service at the study intersections have been summarized in Appendix E, Table E1-2, to this RP-DEIR. As shown in column [4], under "Future with Project" conditions, no significant impacts are anticipated to occur under this scenario when compared to the Original DEIR conclusions. Thus, a less than significant impact would occur with implementation of the Proposed Project. Nevertheless, as disclosed in the Traffic Study and presented above as a PDF, the installation of a traffic signal is recommended at Intersection No. 4 (Tujunga Canyon Boulevard/Pali Avenue). Installation of a traffic signal at this location would further reduce the v/c ratio during the weekday PM peak hour by -0.202 from 1.265 (LOS F) to 1.063 (LOS F).

### ***Project Traffic Distribution and Assignment***

Project traffic volumes both entering and exiting the site have been distributed and assigned to the adjacent street system based on the following considerations:

- The site's proximity to major traffic corridors (i.e., La Tuna Canyon Road, Tujunga Canyon Boulevard, Honolulu Avenue, and Lowell Avenue, etc.);
- Expected localized traffic flow patterns based on adjacent roadway channelization and presence of traffic signals;
- Existing intersection traffic volumes;
- Ingress/egress availability at the Project Site assuming the site access and circulation scheme described above;
- The location of existing and proposed parking areas;
- Nearby population and employment centers; and
- Input from LADOT staff.

The project trip distribution pattern was submitted for review and approval by LADOT staff before finalization.

### *Site Access*

Vehicular access to the Project Site will be provided via two private internal roadways that will connect with La Tuna Canyon Road. Brief descriptions of the Project Site access points and internal roadways are provided in the following paragraphs.

- *La Tuna Canyon Road - Westerly Site Access Point:*

This site access point will be located on the north side of La Tuna Canyon Road, near the southwest corner of the Project Site. The westerly site access point will provide access to the individual residential units and the westerly north-south oriented internal site roadway to be constructed as part of the Proposed Project. It is anticipated that the new intersection formed at this site access point will accommodate full access movements (i.e., left-turn and right-turn ingress and egress turning movements). Based on the location and configuration of the north-south internal roadway and the distance to the first east-west oriented internal roadway, it is expected that adequate storage distance will be provided on the internal road to preclude vehicle queuing onto public roadways (i.e., La Tuna Canyon Road).

- *La Tuna Canyon Road - Easterly Site Access Point:*

This site access point will be located on the north side of La Tuna Canyon Road, approximately mid-way along the southerly project frontage. The easterly site access point will provide access to the individual residential units and the central north-south oriented internal site roadway to be

constructed as part of the Proposed Project. It is anticipated that the new intersection formed at this site access point will accommodate full access movements (i.e., left-turn and right-turn ingress and egress turning movements). Based on the location and configuration of the north-south internal roadway and the distance to the first east-west oriented internal roadway, it is expected that adequate storage distance will be provided on the internal road to preclude vehicle queuing onto public roadways (i.e., La Tuna Canyon Road).

- *Tujunga Canyon Boulevard – Emergency Site Access Points:*

Two site access points will be provided on the west side of Tujunga Canyon Boulevard near the Project Site's northerly property frontage on Tujunga Canyon Boulevard. These two access points will be utilized for emergency access only (i.e., not available for day-to-day use by project residents and visitors).

- *Internal Site Roadways:*

A series of internal roadways with two-way access, one lane in each direction, provide access connection to/from the residential housing units and the site's easterly and westerly access points on La Tuna Canyon Road. The internal roadways are organized as private local and collector streets with varying roadway widths of 20 to 28 feet, respectively. Two collector roadways extend through the site and will connect the various local roadways to provide internal site circulation to the individual units. Curbside parking will be allowed on one side of the internal collector roadways, but parking will be prohibited on the internal local roadways. As such, visitor parking for residences located along local roadways will need to occur within the private driveways of the individual housing units, on the nearby collector roadways, or in the visitor surface parking lots interspersed throughout the site. It should be noted that all of the Project Site internal roadways, including the site's easterly and westerly access points, will be designed and constructed as private streets with gate-controlled entry/exit access from La Tuna Canyon Road.

### ***Adjacent Roadway Improvements***

- *La Tuna Canyon Road*

La Tuna Canyon Road is designated as a Secondary Highway in the Streets and Highways Element of the City's General Plan. Standard Plan S-470-0 dictates that the standard cross-section for a Secondary Highway is a 35-foot half roadway within a 45-foot half right-of-way. With implementation of the required dedication and improvement along the Project Site frontage, a center left-turn lane can be provided on La Tuna Canyon Road adjacent to the Project Site to facilitate left-turn movements to and from the Project Site.

- *Tujunga Canyon Boulevard*

Tujunga Canyon Boulevard is designated as a Class II Major Highway in the Streets and Highways Element of the City's General Plan. Standard Plan S-470-0 dictates that the standard cross-section for a Class II Major Highway is a 40-foot half roadway within a 52-foot half right-of-way. With implementation of the required dedication and improvement along the project frontage and by others related to the single family parcel located on the west side of Tujunga Canyon Boulevard south of Pali Avenue (which is not a part of the project), the current five lane cross-section of Tujunga Canyon Boulevard at the La Tuna Canyon Road intersection can be extended to approximately 200 feet north of the Pali Avenue intersection to improve traffic flow and circulation in the Project Site vicinity.

### ***Vehicle Storage Analysis at Private Entry Gates***

#### *Forecast Vehicle Queues and Proposed Storage Lengths*

The inbound traffic volumes for the proposed easterly and westerly driveways on La Tuna Canyon Road during the AM and PM peak hours were used to forecast vehicle queues and corresponding storage lengths needed to accommodate the peak inbound arrival conditions.

For purposes of the analysis in the Updated Traffic Impact Study, the various types of entering gate control for processing rates have been examined. Based on the parking control service rate table from the City of Los Angeles<sup>2</sup>, a coded-card operated entering gate can process vehicles at an average headway of 8.9 seconds per vehicle which is equivalent to a capacity of approximately 405 vehicles per hour on a per lane basis. As such, this will adequately accommodate the Project's traffic forecasts at both driveways based on the planned configuration of the driveways and the forecast peak hour traffic volumes. It should be noted that the remote-controlled access operation proposed for the Project is anticipated to operate at a similar fashion as this type of gate control.

The inbound AM and PM peak hour driveway traffic volumes were divided by 60 to determine the expected average number of inbound vehicles on a per minute basis during the AM and PM peak hours. To account for potential peak arrival times, the expected inbound vehicles per minute were multiplied by an entry peaking factor of 2.0. An average vehicle length of 20 feet (which includes the bumper to bumper length of a vehicle plus the distance between stop vehicles) is then applied to develop the forecast storage length necessary in order to accommodate peak inbound arrival conditions. To provide a conservative (i.e., worst case) analysis, it has been assumed that vehicles would queue in a single lane, even though two inbound lanes will be provided (one for residents and one for guests).

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<sup>2</sup> City of Los Angeles Department of Transportation, *Manual of Policies & Procedures, Driveway Design, Section 321, Page 8, February 2003.*



Overall, and based on the Proposed Project Site Plan and Trip Generation, it is anticipated that all inbound vehicles will have adequate storage space provided within the Project Site. Vehicles arriving at the Project Site during the AM and PM peak hours can queue entirely within the Project Site and are not anticipated to impede through traffic along La Tuna Canyon Road and Tujunga Canyon Boulevard.

### ***Congestion Management Program Traffic Impact Assessment***

The Congestion Management Program (CMP) is a state-mandated program that was enacted by the State Legislature with the passage 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 2010 Congestion Management Program for Los Angeles County, a Traffic Impact Assessment (TIA) has been prepared to determine the potential impacts on designated monitoring locations on the CMP highway system. The analysis has been prepared in accordance with procedures outlined in the *2010 Congestion Management Program for Los Angeles County*, County of Los Angeles Metropolitan Transportation Authority, 2010.

According to Section D.9.1 of the 2010 CMP manual, the criteria for determining a significant transportation impact is listed below:

“A significant transportation impact occurs when the Proposed Project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ), causing or worsening LOS F ( $V/C \geq 1.00$ ).”

The CMP impact criteria apply for analysis of both freeway and intersection monitoring locations.

#### *Freeways*

The following CMP freeway monitoring location in the Project vicinity has been identified:

- | <u>CMP Station</u> | <u>Segment</u>                          |
|--------------------|---|
| No. 1059           | I-210 Freeway at Terra Bella Street     |
| No. 1060           | I-210 Freeway west of SR-134 and SR-710 |

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 periods. The Proposed Project will not add 150 or more trips (in either direction) during either the AM or PM weekday peak hours at any CMP freeway monitoring locations which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required.

### *Intersections*

The following CMP intersection monitoring location in the project vicinity has been identified:

<u>CMP Station</u>	<u>Intersection</u>
Int. No. 26	Angeles Crest Highway/I-210 Freeway Westbound Off-Ramp

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 Project will not add 50 or more trips during the AM or PM peak hours at the nearest CMP monitoring location listed above, which is the threshold for preparing a traffic impact assessment as stated in the CMP manual. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

### ***Transit Impact Review***

As required by the *2010 Congestion Management Program for Los Angeles County*, a review has been made of the CMP transit service. As previously discussed, existing transit service is provided in the vicinity of the Proposed Project.

As identified in the Traffic Impact Study, two bus transit lines and routes are provided adjacent to or in close proximity to the Project Site. As outlined therein, under the “No. of Buses/Trains During Peak Hour” column, these two transit lines provide services for an average (i.e., average of the directional number of buses during the peak hours) of approximately 10 buses during the AM peak hour and approximately 10 buses during the PM peak hour. Therefore, based on the above calculated AM and PM peak hour transit trips, this would correspond to no more than one additional transit rider per bus. It is anticipated that the existing transit service in the project area will adequately accommodate the net increase of Project-generated transit trips. Thus, given the low number of generated transit trips per bus, no Project impacts on existing or future transit services in the Project area are expected to occur as a result of the Proposed Project.

## **CUMULATIVE IMPACTS**

The analysis of traffic impacts of the Proposed Project considers the effects of future growth in traffic in the region through consideration of traffic generated by the related projects and as described above under the impact scenarios for each jurisdiction. Consequently, impacts of cumulative growth are incorporated into the traffic analysis.

The forecast of future pre-project conditions was prepared in accordance to procedures outlined in Section 15130 of the CEQA Guidelines. Specifically, the CEQA Guidelines provides two options for developing the future traffic volume forecast:

“(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 [lead] agency, or

(B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.”

Accordingly, the traffic analysis provides a highly conservative estimate of future pre-project traffic volumes as it incorporates both the “A” and “B” options outlined in CEQA Guidelines for purposes of developing the forecast.

The future cumulative baseline conditions were forecast based on the addition of traffic generated by the completion and occupancy of related projects, as well as the growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors (i.e., ambient growth). The v/c ratios at all ten of the study intersections are incrementally increased with the addition of ambient traffic and traffic generated by the related projects listed in Table III.C-2, above. As presented in the Traffic Impact Study, nine of the ten study intersections are expected to operate at LOS D or better during the weekday AM and PM peak hours with the addition of growth in ambient traffic and related project traffic under the future cumulative baseline conditions. The intersection of Tujunga Boulevard / Pali Avenue is expected to continue to operate at LOS F during both the weekday AM and PM peak hour under future cumulative baseline conditions. Thus, potential cumulative traffic impacts are expected to be less than significant.

## MITIGATION MEASURES

No mitigation measures are required to help reduce potential impacts to a less than significant level, as there are no potential significant impacts associated with implementation of the Proposed Project.

### Project Requirements

Although not required to mitigate any significant impacts, the Department of Transportation has added the following project requirements as conditions of approval for the Proposed Project:

- N-1 La Tuna Canyon Road:** Provide a 3-foot dedication along the entire project frontage on La Tuna Canyon Road to bring the total right-of-way and sidewalk to the Secondary Highway standard required by the General Plan.

- N-2 Tujunga Canyon Boulevard:** Provide a variable width dedication to complete a 52-foot half right-of-way and a variable width widening and improvement to complete a 10-foot half roadway and a 12-foot sidewalk along the entire Project frontage on Tujunga Canyon Boulevard.
- N-3 Closure of Golf Course/Driving Range:** The hypothetical project scenarios where either the golf course or driving range, or both, are closed will significantly impact the intersection of Tujunga Canyon and La Tuna Canyon Road/Honolulu Avenue. Restriping the eastbound approach to provide one left turn lane, one shared left-right turn lane, and one right turn lane is required to mitigate the intersection to a less than significant level.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

No mitigation measures are proposed, as all potential impacts are less than significant prior to mitigation.

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## IV. ALTERNATIVES TO THE PROPOSED PROJECT

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For Alternatives I through IV, please refer to the Original DEIR. This RP-DEIR section does not revise those alternatives, but rather adds two alternatives.

### 1. ALTERNATIVE V – EXISTING ZONING EQUESTRIAN ESTATES ALTERNATIVE

Alternative 5 is an Equestrian Estates alternative provided to assess an alternative project that is compatible with the equestrian ambiance of La Tuna Canyon in keeping with the existing zoning for the property. Alternative 5 is an all residential development consisting of 86 equestrian estate lots (see Figure IV-1). All lots would have a minimum lot area of 20,000 square feet and a minimum pad area of 11,000 square feet, large enough to accommodate a maximum of five (5) horses per lot. It would require the complete removal of the existing golf course and the driving range, as well as increase the overall amount of the site that would be devoted to development.

#### *Site Design/Open Space*

Proposed homes would have a maximum height of two stories (30 feet) in conformance with the Scenic Highway Corridors Viewshed Protection requirements of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan. As preliminarily designed, Alternative 5 would not connect to any existing equestrian trails. In addition, there would be no land made available for public dedication or public open space.

#### *Protected Trees*

There are currently 441 trees on the Project Site with 321 of them being protected trees as described by the City: 303 coast live oaks, 18 western sycamores and 120 non native mature ornamental trees. Alternative 5 would remove all of the 321 protected trees on-site (303 coast live oaks and 18 western sycamores), compared to the Proposed Project which would remove 85 coast live oaks and eleven (11) western sycamores. In addition, all of the 120 mature “non-protected” trees on-site would be removed, as compared to the 103 that would be removed by the Proposed Project.

#### *Construction Schedule*

While the total construction schedule for Alternative 5 would be the same as that of the Proposed Project, due to the quantity of earthwork, the grading phase of the project is expected to take approximately six months. The construction schedule for Alternative 5 would be the same as that of the Proposed Project, with the exception of the grading phase which would be approximately six months. In comparison, the grading for the Proposed Project is estimated to be approximately two months.

### ***Grading Concept***

Alternative 5 would require the grading of approximately 49 of the 57.45 acres within the Alternative 5 area (86%). While the remaining 8.5 acres of the Project Site acres would not be disturbed by grading, they would be disturbed by fuel modification.

The required grading is significantly higher and requires significantly more import than any other alternative (all quantities in cubic yards). This is due to the overall design and layout of the lots proposed under this Alternative, which is consistent with the underlying zoning and general plan designation for the area:

	Cut	Fill
Raw	345,000	880,000
Removal & Replacement	<u>450,000</u>	<u>450,000</u>
Subtotal	795,000	1,330,000
Shrinkage (10%)	<u>0</u>	<u>133,000</u>
Total	795,000	1,463,000
Import Required	668,000	
Truck Yards (+25%)	835,000	

### ***Discretionary Approvals***

The A1-1 zoning allows one unit for every 2.5 acres (0.4 units per acre), however, the City's Slope Density requirements restricts the allowable units to 0.05 per acre. For the 12.0 acres of A1-1, a total of 0.6 units would be allowed. The RA-1 zoning, as modified by the Sunland Tujunga Community Plan allows 1 unit per 20,000 square feet which equates to 97 allowable units. As a result, the total allowable number of units is 98. Alternative 5 conforms to the existing zoning; therefore, no zone change would be required. However, the alternative would require the following discretionary approvals:

- Approval of a Vesting Tentative Tract Map, which will subdivide the Project Site into 86 single-family lots.
- Site Plan Review findings, pursuant to Section 16.05 of the LAMC, for a development project which creates, or results in an increase of 50 or more dwelling units.
- Project Compliance Review, pursuant to Section 11.5.7 C, for a development within the San Gabriel/Verdugo Mountains Scenic Preservation Plan Area.

### ***Relationship to Project Objectives***

Alternative 5 would satisfy the following project objectives as listed in Section III. Project Description of the Original DEIR:

- To provide housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley and to help alleviate the substantial housing shortage in the City.
- To provide greater regional housing opportunities for homebuyers and assist in satisfying the housing needs for the region.
- To invigorate the local economy by providing employment and business opportunities associated with the construction, use, and occupancy of the Proposed Project.
- To locate the residential development in proximity to existing infrastructure and services where possible.
- To provide safe and efficient streets in the residential development with convenient connections to adjoining arterials and freeways, while minimizing traffic impacts on existing residential neighborhoods.

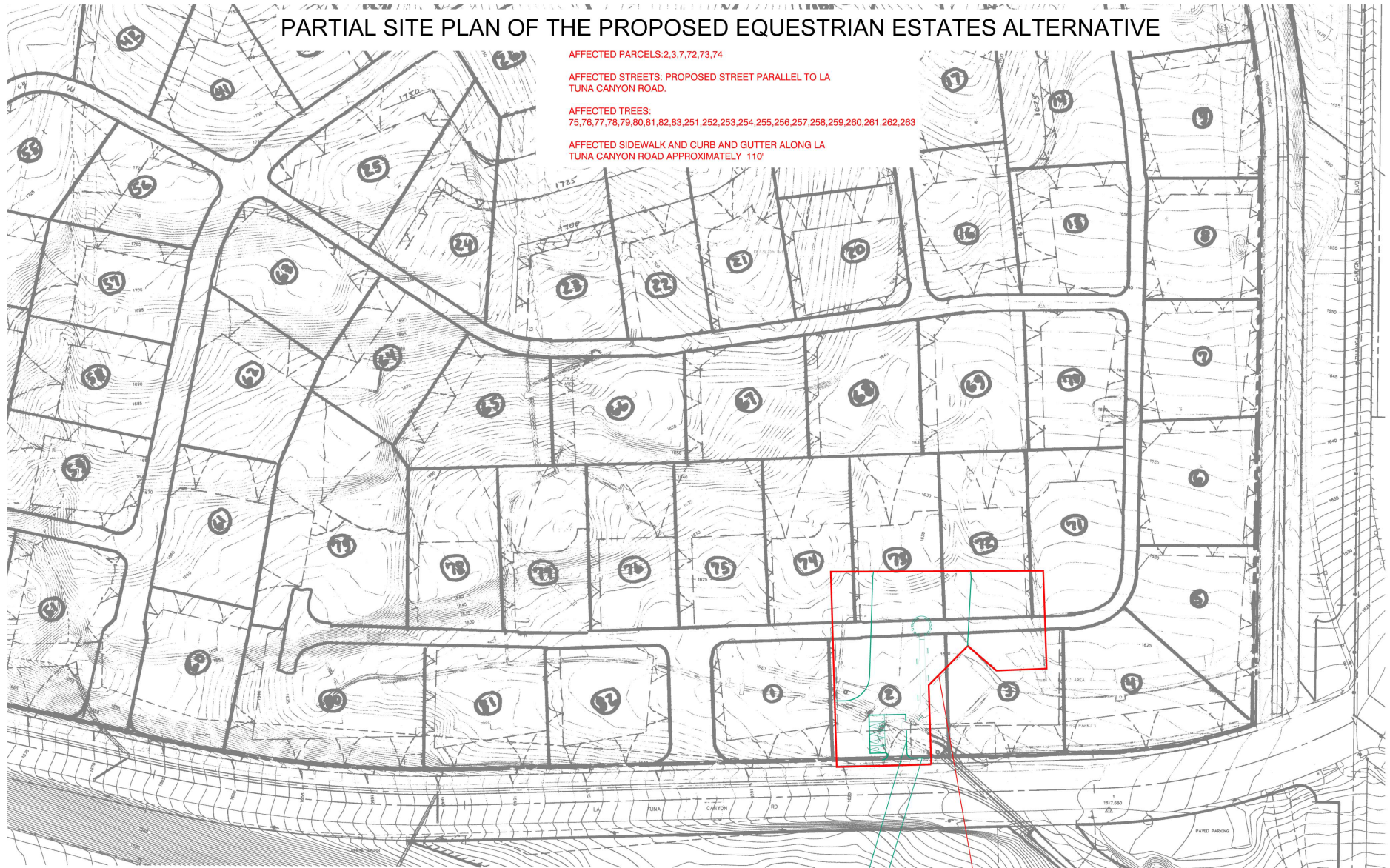
# PARTIAL SITE PLAN OF THE PROPOSED EQUESTRIAN ESTATES ALTERNATIVE

AFFECTED PARCELS: 2,3,7,72,73,74

AFFECTED STREETS: PROPOSED STREET PARALLEL TO LA TUNA CANYON ROAD.

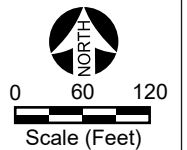
AFFECTED TREES:  
75,76,77,78,79,80,81,82,83,251,252,253,254,255,256,257,258,259,260,261,262,263

AFFECTED SIDEWALK AND CURB AND GUTTER ALONG LA TUNA CANYON ROAD APPROXIMATELY 110'



WORKING GROUP COMMEMORATION  
INSTALLATION AND PARKING  
WORKING GROUP- OUTLINE OF CURB  
AROUND OAK GROVE

OUTLINE OF HISTORIC-CULTURAL  
DESIGNATION PURSUANT TO LOS ANGELES  
CITY COUNCIL MOTION 54A





## Environmental Impacts

### *Aesthetics*

Alternative 5 would increase Aesthetic impacts to scenic vistas from both Interstate 210 and La Tuna Canyon Road (designated scenic highways), when compared to the Proposed Project. Because the Project Site is intermittently visible in the foreground view from car trips on La Tuna Canyon Road and Interstate 210, any change to the aesthetic character of the Project Site would affect those potential views of scenic vistas. While the Proposed Project would eliminate the most prominent aspect of the foreground views, i.e., the green, landscaped open space of the golf course, it would preserve the higher elevations of the hillsides surrounding the golf course. In contrast, Alternative 5 would alter the entire Project Site either through grading, construction or fuel modification. Therefore, Alternative 5 will increase the significant Aesthetic impacts to scenic vistas as compared to the impact of the Proposed Project.

- The Proposed Project would retain 28.4 acres of undeveloped land potentially available for public dedication. Of this total, approximately 14.5 acres would be retained in their current undisturbed condition, while the remaining 16.6 acres would be subject to modification due to the City's fuel modification requirements. In contrast, Alternative 5 would retain no undisturbed open space. All private open space not subject to grading would be subject to fuel modification.
- The Proposed Project would grade and cause landform alterations to 25.8 acres of the Project Site. In contrast, Alternative 5 would grade and cause landform alterations to 49 acres of the Project Site.
- The Proposed Project would grade and cause landform alterations to 25.8 acres in a terraced and stair stepped fashion. In contrast, Alternative 5 would excavate 795,000 cubic yards and would emplace 1,463,000 yards of fill.
- The Equestrian Estates Alternative would remove all of the 321 protected trees on-site (303 coast live oaks and 18 western sycamores), compared to the Proposed Project which would remove 85 coast live oaks and eleven (11) western sycamores. In addition, all of the 120 mature "non-protected" trees on-site would be removed, as compared to the 103 that would be removed by the Proposed Project.

The effect Alternative 5 would have with respect to the existing visual character or quality of the Project Site and its surroundings is substantial. Although the density and equestrian-orientation of Alternative 5 is more in keeping with the local neighborhoods and the equestrian community in La Tuna Canyon, the loss of the golf course, the removal of all the trees on the Project Site, and the extensive landform alteration associated with equestrian uses to flatten the site would substantially alter the site's existing visual character.

### Aesthetics/Visual Character

The elimination of the existing golf course and its replacement by equestrian uses and housing will introduce a land use that is consistent with the visual character of areas to the east and west of La Tuna Canyon. Although the proposed land use would differ than what exists currently, the effect of Alternative 5 (i.e., the introduction of a suburban development adjacent to a residential community) would not substantially degrade the existing visual character of the Project Site and would not compromise the character of La Tuna Canyon Road. Given the extreme alteration of existing landforms on the Project Site would, however, create a development that would be out of scale with neighboring residential areas. In addition to potential landscape buffers, the proposed development would not be setback from the property line and would be oriented towards street frontages, both of which would decrease buffer opportunities for those with views of and towards the Project Site. Balancing these various aesthetic aspects, it is concluded that Alternative 5 would increase impacts to the existing visual character and quality of the site and its surroundings when compared to the Proposed Project.

### Views

Dense landscaping and native vegetation largely block views into portions of the Project Site. From intermittent glimpses between the vegetation, travelers see only portions of the golf course. Clear views into the interior occur from the club house east to the Tujunga Canyon Boulevard intersection. Foreground views of the parking lot and the driving range predominate. Westbound views of the Project Site from areas such as La Tuna Canyon Road begin at its intersection with Tujunga Canyon Boulevard. At the intersection, the Verdugo Wash, the golf course's paved parking lot, its low slump-stone wall and sparse landscaping dominate foreground views. Alternative 5 would develop the Project Site with multi-story single-family residences and related equestrian uses, thereby partially obstructing views of areas to the north and east of the Project Site from public viewing locations. However, as previously discussed in the Original DEIR, there are no clear sight lines through the Project Site to any areas north of the site that are considered unique or valued.

#### *Views of the Project Site from Vista Points, Equestrian/Hiking Trails, and Interstate 210 Freeway*

In short, there are no official or non-public equestrian trails depicted on the Specific Plan trail maps in Alternative 5 vicinity; therefore, Alternative 5 would have no effect on scenic vistas visible from equestrian/hiking trails depicted on those maps. However, there are trails on the south side of La Tuna Canyon to the west of the Project Site that are not shown on the Specific Plan's trail maps from which the Project Site may be visible. Aesthetic impacts to those trails would vary depending upon the orientation of those trails, the extent of intervening terrain and vegetation and the distance separating the Project Site from any such trail. Overall, the visual character of Alternative 5 as viewed from the 210 Freeway would not conflict with any established community aesthetics and would be representative of the diversity of properties that exemplify this area of the freeway. As such, Project impacts in relationship to the visual environment of this area would be less than significant and less than the significant and unavoidable impact identified in the Original DEIR.

## *Light and Glare*

### Construction

Alternative 5 would remove all of the high-intensity lighting fixtures on the Project Site that currently illuminate the golf course, the driving range, and the associated facilities. Lighting needed during Alternative 5 construction could generate light spillover to off-site sensitive land uses in the Alternative 5 vicinity, including the adjacent residential uses to the east. However, construction activities would occur in accordance with the provisions of the Los Angeles Municipal Code Section 41.40. Therefore, construction lighting would be used primarily during daylight hours, and would only occur for the duration needed in the construction process and light impacts associated with construction would be less than significant and similar to that of the Proposed Project.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities within each development site. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. The potential for nighttime glare associated with construction activities is unlikely as most construction activities would occur during the day, and any nighttime construction work would be temporary. As such, Alternative 5 would not result in a significant impact related to construction glare and impacts would be similar to those identified in the Original DEIR for the Proposed Project.

### Operation

Glare is not anticipated, as the proposed residences would have stucco, wood, stone and/or brick and block facades. Windows would not be highly reflective. Other prominent objects in vicinity view sheds are illuminated. All new light generated by Alternative 5's operation would be similar to that generated by typical single- and multi-family communities and would not significantly affect light-sensitive land uses by introducing new sources of light or glare that could have substantial adverse effects on day or nighttime views in the area.

Alternative 5 would remove all of the high-intensity lighting fixtures on the Project Site that currently illuminate the golf course, the driving range and the associated facilities. This would eliminate a major source of glare visible from both the Interstate 210 Freeway and La Tuna Canyon Road, as well as from Tujunga Canyon Boulevard. However, existing lighting would be replaced, however, with new lighting, including streetlights, landscape and security lighting, window glow and vehicle headlights. Street lighting, in particular, has the potential to be a new source of light or glare which could adversely affect nighttime views in the areas. However, impacts would be similar to the less than significant impacts identified in the Original DEIR.

### *Shade and Shadow*

Due to the location of the Project Site and the proposed height of structures, shade and shadow impacts are not considered relevant. Particularly, shadow impacts are typically greatest during the winter months due to the sun's low position in the sky, with the resultant longer shadows stretching roughly from the northwest to the northeast during daytime hours. As a result, due to the areas north of the Project Site being at a higher elevation and the areas to the east being located across a drainage channel and street, no impacts are expected to occur.

### *Air Quality*

The analysis for the Equestrian Estates Alternative follows the same methodology as the analysis performed in the Original DEIR Air Quality Section IV.C, and is compared to the Proposed Project as well as all applicable thresholds.

### *Consistency with the 2012 AQMP*

Alternative 5 is consistent with the projections of employment and population forecasts identified in the Growth Management Chapter of the RCPG and are considered consistent with the AQMP growth projections, since the Growth Management Chapter forms the basis of the land use and transportation control portions of the AQMP.

Implementation of Alternative 5 would not directly or indirectly induce substantial population or employment growth beyond current growth projections. Because this Alternative would be consistent with the regional population forecasts for the City of Los Angeles, it would not jeopardize attainment of State and national ambient air quality standards in the Basin and the Los Angeles County portion of the Basin.

Generally, if a project is planned in a way that results in the minimization of vehicle miles traveled (VMT) both within the Project Site and the community in which it is located, thus minimizing air pollutant emissions, that aspect of the project is consistent with the AQMP. Based on this information, Alternative 5 would not jeopardize attainment of air quality standards in the 2012 AQMP for the Basin and the Los Angeles County portion of the Basin due to internal walkability of the site, location near mass transit, consistency with RCPG population forecasts; thus, this impact would be less than significant and similar to the Proposed Project.

### Construction Period Emissions – Mass Daily Emissions

During construction of Alternative 5, the same five basic types of activities identified for the Proposed Project would be expected to occur and generate emissions. However, Alternative 5 would reduce import truck trips to about 51,384 haul trips, assuming a minimum capacity of 13 cubic yards per haul truck. Also, it is assumed that the pieces of equipment for each construction activity would be the same as the Proposed Project.

Construction emissions are calculated using the CalEEMod 2013.2.2 computer model developed by the SCAQMD by estimating the types and number of pieces of equipment that would be used to remove existing facade, excavate the project site, and construct the proposed development. Construction emissions are analyzed according to the regional thresholds established by the SCAQMD and published in the CEQA *Air Quality Handbook*. The construction activities associated with Alternative 5 would cause diesel emissions, and would generate emissions of dust. Construction equipment within the Project Site that would generate criteria air pollutants could include excavators, dump trucks, and loaders. Some of this equipment would be used during demolition activities as well as when structures are constructed on the Project Site. In addition, emissions during construction activities include export truck trips off-site to remove debris and delivery truck trips during the demolition phase. CalEEMod evaluates all diesel-powered equipment used during construction activities.

During construction of Alternative 5, six basic types of activities would be expected to occur and generate emissions. First, the existing structures would be demolished. Second, the development site would be prepared and excavated. Third, the site would be graded to accommodate building foundations. Fourth, the proposed residential units would be constructed. Fifth, paving to accommodate new structures will be done. Finally, architectural coatings will be applied to the proposed residential units.

Overall, construction of Alternative 5 is assumed to occur over a 35-month period beginning in January 2016 with completion in November 2018. It is assumed that these pieces of equipment would run for a maximum of eight hours per day five days per week.

As shown in Table IV-1, all emissions of criteria pollutants during the construction process would not exceed daily significance thresholds recommended by the SCAQMD, as this alternative includes a fraction of the residential units associated with the Proposed Project.

#### Localized Emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>

To determine whether or not construction activities associated with Alternative 5 could create significant adverse localized air quality impacts on nearby sensitive receptors located offsite, the emissions contribution from Alternative 5 are also analyzed according to SCAQMD's localized significance threshold (LST) methodology. Under this methodology, projects that are greater than five acres in size should perform air quality dispersion modeling to determine whether construction activities would cause or contribute to adverse localized air quality impacts. The criteria pollutants that are required to be analyzed include NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>.

It should be noted that the SCAQMD considers a sensitive receptor to be a receptor where it is possible that an individual could remain for 24 hours. Thus, according to the SCAQMD, the LSTs for PM<sub>10</sub> and PM<sub>2.5</sub>, which are based on a 24-hour averaging period, would be appropriate to evaluate the localized air quality impacts of a project on nearby sensitive receptors. Additionally, since a sensitive receptor is considered to be present onsite for 24 hours, LSTs based on shorter averaging times, such as the one-hour NO<sub>2</sub> or the 1-hour and 8-hour CO ambient air quality standards, would also apply when evaluating

localized air quality impacts on sensitive receptors. However, LSTs based on shorter averaging periods, such as the NO<sub>2</sub> and CO LSTs, are applied to receptors such as industrial or commercial facilities since it is reasonable to assume that workers at these sites could be present for periods of one to eight hours.<sup>1</sup> Therefore, this analysis evaluates localized air quality impacts from construction activities associated with Alternative 5 on sensitive receptors for NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>, and on “non-sensitive” receptors (*e.g.*, industrial or commercial facilities) for NO<sub>2</sub> and CO.

The daily construction emissions generated by the Proposed Project are also analyzed to determine whether or not they would result in significant adverse localized air quality impacts on nearby sensitive receptors located off-site, including the neighboring convalescent home. As shown in Table IV.C-7 of the Original DEIR, localized emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> would not exceed LST thresholds established by the SCAQMD.

**Table IV-1**  
**Estimated Mass Daily Construction Emissions - Unmitigated**

Emissions Source	Emissions in Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Demolition</b>						
On-Site Emissions	4	46	35	<1	3	2
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	4	46	36	<1	3	2
<b>Grading</b>						
On-Site Emissions	6	75	49	<1	10	7
Off-Site Emissions	4	66	48	<1	5	2
Total Emissions	10	141	97	<1	15	9
<b>Building Construction</b>						
On-Site Emissions	3	26	18	<1	2	2
Off-Site Emissions	<1	1	3	<1	<1	<1
Total Emissions	3	27	21	<1	2	2
<b>Paving</b>						
On-Site Emissions	2	17	14	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	17	15	<1	1	1
<b>Architectural Coatings</b>						
On-Site Emissions	35	2	2	<1	<1	<1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	35	2	2	<1	<1	<1
<b>Regional Significance Threshold</b>						
Exceed Threshold?	No	No	No	No	No	No
<b>Localized Significance Threshold</b>						
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning, 2015. Calculation sheets are provided in Appendix G to this RP-DEIR.

<sup>1</sup> Ibid.

### Operational Emissions

Operational emissions associated with Alternative 5 are estimated using the CalEEMod 2013.2.2 computer model and the information provided in the traffic study prepared for Alternative 5. Operational emissions would be comprised of mobile source emissions and area source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with operation of Alternative 5. Area source emissions are generated by natural gas consumption for space and water heating, and landscape maintenance equipment. To determine if an air quality impact would occur, the net increase in operational emissions generated by the Proposed Project in 2019 (Alternative 5 buildout year) would be compared with the SCAQMD's recommended thresholds.

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Site after occupation. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices and cooking appliances, the operation of landscape maintenance equipment, the use of consumer products, and the application of architectural coatings (paints). Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions has been prepared utilizing the CalEEMod 2013.2.2 computer model recommended by the SCAQMD. The results of these calculations for existing operations are presented in Table IV-2.

Emissions from the operation of the Proposed Project are presented in Table IV-2, below. As shown, Alternative 5 would generate net increases in average daily emissions that do not exceed the thresholds of significance recommended by the SCAQMD. This is a less than significant impact and less than the Proposed Project average daily emissions.

**Table IV-2**  
**Existing Estimated Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summertime (Smog Season) Emissions</b>						
<b>Existing Land Uses</b>						
Area Sources	0.00	0.00	0.00	0.00	0.00	0.00
Energy Sources	0.00	0.00	0.00	0.00	0.00	0.00
Mobile Sources	3.05	8.30	33.43	0.10	6.40	1.80
<b>Total Emissions</b>	<b>3.05</b>	<b>8.30</b>	<b>33.43</b>	<b>0.10</b>	<b>6.40</b>	<b>1.80</b>
<i>Source: CAJA Environmental Services, LLC. Calculation sheets are provided in Appendix G of this RP-DEIR.</i>						

### Localized Hotspot CO Concentrations

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed CO “hotspots.” The SCAQMD considers CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots. Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.<sup>2</sup>

Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

Long-term operations of Alternative 5 would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Alternative 5 development area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, Alternative 5 would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot. Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.<sup>3</sup> Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. Traffic levels of service at the intersections studied in the vicinity of the Alternative would not be significantly impacted by traffic volumes as mitigated from the development under existing or future horizon scenarios.<sup>4</sup> In addition, Alternative 5 would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow.

As shown in Table IV-3, below, future CO concentrations near these intersections would not exceed the national and State ambient air quality standards for CO. Therefore, implementation of Alternative 5 and cumulative development would not expose any possible sensitive receptors (such as residential uses, schools, hospitals) located in close proximity to these intersections to substantial localized pollutant

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<sup>2</sup> Caltrans, *Transportation Project-Level Carbon Monoxide Protocol*, updated October 13, 2010.

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

<sup>4</sup> Linscott, Law & Greenspan, “Traffic Impact Study for the Verdugo Hills Residential Project, City of Los Angeles,” February 2015.



concentrations. This would be a less than significant impact regarding the exposure of sensitive receptors to substantial pollutant concentrations and less than the Proposed Project when compared.

**Table IV-3**  
**Estimated Daily Operational Emissions – Equestrian Alternative – 2019**

Emissions Source	Emissions in Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summertime (Smog Season) Emissions</b>						
Area Sources	26.15	0.65	50.36	0.07	6.61	6.61
Energy Sources	0.83	0.71	0.30	0.00	0.56	0.06
Mobile Sources	2.72	8.10	32.21	0.10	6.42	1.80
Total Emissions	28.96	9.47	82.87	0.17	13.09	8.47
Existing Emissions	(3.05)	(8.30)	(33.43)	(0.10)	(6.40)	(1.80)
Net Emissions	25.91	1.17	49.44	0.07	6.69	6.67
SCAQMD Threshold	55.00	55.00	550.00	150.00	150.00	55.00
<b>Significant?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<i>Note: Subtotals may not appear to add correctly due to rounding in the CalEEMod model.</i> <i>Source: DKA Planning, 2015. Calculation sheets are provided in Appendix G.</i>						

#### Airborne Odors

The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source, the wind speeds and direction, and the sensitivity of the receiving location each contribute to the intensity of the impact. While offensive odors rarely cause any physical harm, they can be unpleasant and cause distress among the public and generate citizen complaints.

Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. The Equestrian Estates Alternative would include residential use, and would not contain any of the above-listed odor producing uses. Instead, potential operational airborne odors could result from cooking activities associated with the new residential units. These odors would be minimal, if noticeable at all; would be similar to existing residential uses in the local vicinity; and would be confined to the immediate vicinity of the new buildings.

Nevertheless, there is potential for odors related to the proposed equestrian uses on the Project Site. Equestrian odors can be emitted from animal housing, manure storage, and land application. Also, potential odors from temporary field stacking, stored feeds, and other related uses could create an odor that is not common to the areas surrounding the Project Site. All of these together could create a potential significant odor impact to neighboring sensitive uses such as residential land and senior housing. Due to the unknown degree of potential odors that could be emitted from equestrian uses, there is no mitigation available to reduce impacts. Therefore, implementation of the Equestrian Alternative is expected to

create objectionable odors affecting a substantial number of people. Thus, this is a potentially significant impact and impacts would be greater under this Alternative than the Proposed Project.

### *Mitigation Measures*

#### Construction Impacts

As no significance thresholds for construction impacts were exceeded, mitigation measures are not required.

#### Operational Impacts

Due to the unknown degree of potential odors that could be emitted from equestrian uses, there is no mitigation available to reduce impacts.

### *Level of Significance with Mitigation*

As the Equestrian Estates Alternative would not result in any significant regional or localized air quality impacts, no mitigation measures are required as it relates to air quality. Nevertheless, there could be potential odor impacts associated with implementation of the equestrian uses in an area of the City surrounded by single- and multi-family housing. With that and when compared to the Proposed Project, impacts associated with Alternative 5 would be greater than the Proposed Project.

### ***Biological Resources***

This Alternative will result in far more impacts to biological resources than the Proposed Project due to the substantial increase in the disturbed footprint area. By increasing the area of development within the northern and western portions of the Project Site, additional impacts to native plant communities, special-status species, protected and mature trees, and jurisdictional drainages (from increased fuel modification and development areas) are expected to occur when compared to the Proposed Project. The impacts from the Equestrian Estates Alternative are discussed in detail below and compared to the impacts of the Proposed Project.

#### *Special-Status Species*

The Equestrian Estates Alternative would remove all native scrub and oak woodland habitats within the Project Site due to project construction and fuel modification as described under the Proposed Project. Due to the larger footprint of this alternative than the Proposed Project, elimination of all native habitats from construction and fuel modification zones would increase the extent and severity of impacts on special status species. Although the level of impacts would be increased, the same species potentially impacted under the Proposed Project would be affected under the Equestrian Estates Alternative but to a higher degree given the total area expected to be disturbed. Even with implementation of Mitigation

Measures D.1-1 through D.1-4, as prescribed under the Proposed Project, potential impacts to special-status species would be considered significant and unavoidable.

#### *Protected and Mature Trees*

As shown in Table IV-4 below, the Equestrian Estates Alternative would remove all of the 321 protected trees on-site (303 coast live oaks and 18 western sycamores), compared to the Proposed Project which would remove 85 coast live oaks and eleven (11) western sycamores. In addition, all of the 120 mature “non-protected” trees on-site would be removed, as compared to the 103 that would be removed by the Proposed Project. The amount of mitigation required for the protected trees would be substantially more under the Equestrian Estates Alternative than for the Proposed Project, as the number of individual trees and area of protected tree canopy removed would be greater; this would require a revision to the conceptual planting plan and land acquisition at an off-site location to accommodate the mitigation plantings. Similar to the Proposed Project, these impacts would still be considered significant with mitigation in the short-term due to the temporary loss of protected trees until they can grow to the size necessary to adequately replace the removed trees but to a greater degree of significance given more mitigation required under this Alternative when compared to the Proposed Project. However, these tree impacts would be reduced to less than significant levels in the long-term due to the implementation of Mitigation Measures D.2-16 through D.2-20 (although at an off-site location), prescribed under the Proposed Project.

**Table IV-4**  
**Protected and Mature Tree Removals from Alternative 6 Compared to the Proposed Project**

	<b>Total Removed by Proposed Project</b>	<b>Total Removed by Alternative 5</b>	<b>Difference ( ) = fewer removed</b>
<b>Protected Native Tree Species</b>			
Coast live oak	85	303	218
California sycamore	11	18	7
<b>TOTAL Protected Native Trees</b>	<b>96</b>	<b>321</b>	<b>225</b>
<i>Source: CAJA Environmental Services, LLC 2015 (Verdugo Hills Golf Course Tree Report, September 2008)</i>			

#### *Sensitive Wildlife Movement and Migration Corridors*

As described under the Proposed Project, the Project Site is not considered to constitute, or be a part of, a wildlife movement or migration corridor, due to the considerable suburban development that exists to the north and east making the site a “dead end” for any mobile wildlife species attempting to move or migrate from the Verdugo Mountains northward or eastward into the San Gabriel Mountains. Therefore, as under the Proposed Project, the Equestrian Estates Alternative would result in a less than significant impact to wildlife movement or migration corridors and impacts would be similar in nature to the Proposed Project.

### *Wetlands*

No wetlands are present on the Project Site. However, there are potentially jurisdictional drainage features present on the Project Site. Although impacts to these drainages from Alternative 5 would be less than the impacts from the Proposed Project, they would still be considered potentially significant; however, implementation of Mitigation Measure D.1-6, prescribed under the Proposed Project, would reduce these potential impacts to potentially jurisdictional “waters of the U.S.” and streambeds to less than significant, similar to the Proposed Project.

### ***Cultural Resources***

Because Alternative 5 would disturb a larger area of the Project Site than the Proposed Project, it has the potential to increase impacts to archaeological and paleontological resources. Nevertheless, because potential cultural resources have been removed from the Project Site (due to previous golf course development), neither the Proposed Project nor Alternative 5 would impact any potential archaeological or paleontological resources.

With regards to historic resources, because of the significance of events associated with the property, the SWCA Evaluator (in 2005) recommended commemoration of portions of the Project Site through designation as a California Historical Landmark (CHL). Such an additional designation was not intended to preserve the present resources at Verdugo Hills Golf Course, but to commemorate associated events through interpretation at the Project Site, to encourage sensitive development of the overall landscape, and to accommodate visitors to the Project Site through ease of parking, observation, and meditation. As a result of this study, portions of the Project Site were recorded as a historic resource with the State of California Office of Historic Preservation.

Pursuant to City Council Motion 54A, as discussed in further detail in Section X, a portion of the property with coast live oaks and sycamores was declared a Historic-Cultural Monument per Los Angeles Administrative Code Chapter 9, Division 22, Article 1, Section 22.171.7. Alternative 5 is affected by the City of Los Angeles’s Historic-Cultural Designation in that approximately five homes, common area landscaping, and a proposed internal street are proposed to be located within the designated portion of the Property. Pursuant to the Los Angeles Administrative Code and City permitting requirements, any permit that requires demolition, substantial alteration, or relocation of a Historic-Cultural Monument shall be referred to the Cultural Heritage Commission for review and approval before a permit is issued. As such, work associated with permits needed for alteration, removal, or relocation of the designated Coast Live Oaks and Sycamores and existing physical improvements would, therefore, require referral to the Cultural Heritage Commission.

Since public access is not a condition to or requirement of Historic-Cultural Monument designation, Alternative 5 will create a development in which access to the HCM designation will not be available to the general public (or vastly limited) due to design limitations associated with the equestrian uses. Furthermore, equestrian uses under Alternative 5 would greatly detract from a potential visitor experience

by creating dust and odors from the related equestrian uses that may surround any potential designation area, therefore, impacting any meditative experience. Overall, while cultural resources impacts under the Proposed Project would be less than significant, they would be increased under this Alternative due to limitations on access and designation areas.

### ***Geology and Soils***

Alternative 5 and the Proposed Project would be subject to the same potential geotechnical conditions on the Project Site (e.g., seismicity, slope instability and soil erosion). However, Alternative 5 would involve more landform alteration: Alternative 5 would grade approximately 49 acres of the Project Site, while the Proposed Project would grade 28.6 acres (approximately 20.4 acres less than Alternative 5). Alternative 5 would also require more earthwork: it would involve approximately 795,000 cubic yards of cut and 1,463,000 cubic yards of fill, of which approximately 64,000 cubic yards would be imported. In comparison, the Proposed Project would require approximately 443,877 cubic yards of cut and 508,155 cubic yards of fill. Geologic impacts from landform alterations under the Proposed Project would be less than significant because grading would only occur on slopes with less than a 15 percent gradient. However, Alternative 5 would grade much steeper average slopes requiring greater slope stabilization. Therefore, Alternative 5 would increase landform alteration-related impacts when compared to the Proposed Project.

The Project Site does not lie within an Alquist-Priolo Special Studies Zone and no known active or potentially active faults cross the Project Site. Therefore, neither the Proposed Project nor Alternative 5 would expose people or structures to adverse effects involving rupture of a known earthquake fault.

The Project Site is susceptible to strong ground shaking during a seismic event. However, the homes under either the Proposed Project or Alternative 5 must be designed in conformance with the City of Los Angeles Building Code, which would reduce strong ground shaking risks for either project to a Code accepted level.

The Project Site is not within an area considered subject to liquefaction or seismic settlement. Therefore, neither the Proposed Project nor Alternative 5 would expose people or structures to potential substantial adverse effects involving liquefaction.

Because Alternative 5 would increase the total site area disturbed by grading and would require large cut slopes in steep hillsides, it would increase the potential for erosion and sedimentation, compared to the Proposed Project. While compliance with the Grading Code and Federal Clean Water Act regulations would reduce soil erosion and loss of topsoil for the Proposed Project, Alternative 5 has to potential to significantly increase these hazards.

As discussed above, Alternative 5 would grade steep slopes requiring large cut slopes in areas exceeding an average 15% gradient. Therefore, Alternative 5 would increase the potential for the construction to expose people or structures to potentially substantial adverse effects, including the risk of loss or injury.

Since the primarily granular character of the surficial materials on the Project Site is not conducive to the development of mud and debris flows, neither the Proposed Project nor Alternative 5 would be subject to significant impacts from mud and debris flows.

No potential land subsidence-related circumstances and or activities are suspected to occur on the Project Site, nor have they in the past. Therefore, neither the Proposed Project nor Alternative 5 would be subject to subsidence hazards.

Expansive earth materials are not known to be present within the Project Site. Therefore, neither the Proposed Project nor Alternative 5 would be subject to significant impacts resulting from expansive earth materials.

Although potential impacts would be less than significant, they would be greater when compared to the Proposed Project due to the increase in overall surface disturbance of the Project Site.

### ***Greenhouse Gas Emissions***

Alternative 5 would have a lesser impact on global climate change than the Proposed Project given the reduction in the number of dwelling units and the resulting reductions in floor area. As a result, CO<sub>2</sub>e emissions associated with residential uses would be lower for all of the following sources:

- Area sources. Emissions of consumer products, architectural coatings, and landscaping equipment would be lower with the 88-unit alternative than the Proposed Project.
- Energy use. Emissions associated with heating and cooling of the residences would be lower, as both natural gas combustion and use of fossil fuels to generate electricity for the development would be lower.
- Water and wastewater use. CO<sub>2</sub>e emissions associated with supplying water and treating wastewater would be lower with Alternative 5, given the substantial reduction in the number of dwelling units.
- Solid waste. CO<sub>2</sub>e emissions associated with disposal of solid waste into nearby landfills would be lower, given the reduction in dwelling units and waste generated by the development.
- Mobile sources. Alternative 5 would generate far fewer vehicle trips to and from the Project Site; result in less combustion-related emissions of CO<sub>2</sub>e.
- Construction activities. The one-time grading and construction of the Project Site would be lower with Alternative 5, given the smaller scale of built improvements on the Project Site.

Alternative 5 would be comparable to the Proposed Project in its consistency with climate change policies and requirements. As a result, potential impacts would be less than significant, with overall CO<sub>2</sub>e

emissions impacts lower than the Proposed Project due to the decrease in overall development scope on the Project Site.

### ***Hazards and Hazardous Materials***

According to EnviroStor, there are no cleanup sites, permitted sites, or other sites on the Project Site.<sup>5</sup> According to GeoTracker, there are no LUST Cleanup Sites, Other Cleanup Sites, Land Disposal Sites, Military Sites, WDR (Waste Discharge Requirements) Sites, Permitted UST Facilities, Monitoring Wells, DTSC Cleanup Sites, or DTSC Hazardous Waste Permit sites on the Project Site.<sup>6</sup> The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.<sup>7</sup>

In addition and according to the Section IV., Impacts Found to be Less Than Significant, while there are detectable concentrations of petroleum hydrocarbons in one location, soil remediation in that area would reduce hazards from detectable concentrations of petroleum hydrocarbons to a less than significant level. In addition, there are no known properties within a one-mile radius of the Project Site with known or documented releases of potentially hazardous materials. Therefore, neither the Proposed Project nor Alternative 5 would be adversely affected by hazardous materials left over from previous site uses or from offsite properties.

Both the Proposed Project and Alternative 5 are residential developments. Therefore, neither project would use, store, or transport significant amounts of hazardous materials; be likely to result in reasonably foreseeable conditions involving the release of hazardous materials into the environment; or emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school. Therefore, neither the Proposed Project nor Alternative 5 would have a significant impact with respect to adverse hazards and/or hazardous materials.

### ***Hydrology and Water Quality***

The following Hydrology discussion summarizes and incorporates by reference the following report: Permco Engineering & Management, Drainage Analysis Appurtenant to the Vesting Tentative Map for 86 Lot Equestrian Alternative “Verdugo Hills, Tract 69976, 6433 La Tuna Canyon Road, November 17, 2009. This Drainage Analysis Report is included as Appendix H, in the Original DEIR.

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<sup>5</sup> State of California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed January, 2015.

<sup>6</sup> State of California Environmental Protection Agency, State Water Resources Control Board, Geotracker, website: <http://geotracker.waterboards.ca.gov/map/>, accessed January, 2015.

<sup>7</sup> State of California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf>, accessed January, 2015.

Both the Proposed Project and Alternative 5 would develop the site with residential uses; however, because of less impervious surface area, Alternative 5 would generate less runoff than the Proposed Project. Whereas the Proposed Project would increase total impervious surface area on the Project Site from 1.11 acres to 16.6 acres, Alternative 5 would only result in a total of 12.67 acres of impervious surface area. To determine the expected volume of runoff, each lot in Alternative 5 is assumed to contain a 3,000 square foot house footprint and 30-foot driveway from the private street to the house. In addition, a fire factor of 0.71 has been included in the calculations for the developed areas. Using the County's TC Calculator, the 50-year, 24 Hour Runoff Volumes for each subarea (including both developed and undeveloped portions of the Project Site) are as presented in Table IV-5.

**Table IV-5**  
**Alternative 5 – 24-Hour Runoff Volume Summary**

<b>Runoff Volumes in Acre-Feet</b>			
<b>Subarea</b>	<b>Undeveloped Area</b>	<b>Developed Area</b>	<b>Total</b>
10A	5.25	9.42	9.77
20A	2.80	2.17	3.89
30A	1.11	1.30	1.76
40A	0.37	0.75	0.75
<b>Totals</b>	<b>9.53</b>	<b>13.64</b>	<b>16.17</b>

As shown in Table IV-5, during a 50-year storm Alternative 5 would generate a total 24-hour volume of 16.17 acre feet of runoff. In comparison, the Proposed Project would generate 18.3 acre feet of runoff during the same period. Consequently, Alternative 5 would reduce the total 24-hour runoff volume by 2.13 acre feet (or approximately 12 percent), compared to the Proposed Project.

Both developments would be required to comply with the NPDES BMP requirements to ensure that the construction activities would not cause soils erosion and/or the discharge of polluted water from the Project Site. Similarly, both projects would also be required to comply with the SUSMP BMP measures to ensure that the long-term operational activities would not result in the discharge of urban pollutants into the storm drainage system. These BMPs would be detailed in a Low Impact Development (LID) Plan and, if applicable, a SWPPP, which would be in compliance with the latest NPDES Stormwater Regulations and would be approved by the City Engineer. With implementation of the required construction BMPs, the impacts of water quality during construction would be less than significant. Additionally, this analysis assumes Alternative 5 would utilize the Proposed Project's system of underground tanks to allow infiltration into the native soils in order to satisfy the stormwater treatment requirements of the City's General Stormwater Discharge Permit issued by the Regional Water Quality Control Board. Therefore, Alternative 5 would have approximately the same less than significant water quality impacts as the Proposed Project.



Since it is the Proposed Project's goal that post-development runoff would not exceed that generated by the Project Site in its existing condition, the Proposed Project would capture and detain the excess runoff within each subarea in underground tanks. Alternative 5 would use the same underground storage tank system too ensure that post-development runoff would not exceed that generated by the Project Site in its existing condition. Therefore, off-site hydrology impacts are expected to be comparable; both would be less than significant.

#### *Storage of Excess Runoff*

Similar to the Proposed Project, Alternative 5 provides underground storage areas for the runoff in excess of the predevelopment volumes in order to mitigate impacts to the City's existing storm drain system. As proposed, the drainage improvements for Alternative 5 would capture and detain the excess runoff within each drainage subarea in underground tanks. These tanks would also allow infiltration into the native soils in order to satisfy the stormwater treatment requirements of the City's General Stormwater Discharge Permit issued by the Regional Water Quality Control Board.

In order not to impact the proposed structures (houses, walls, etc.) and other surface improvements and as recommended by the Alternative's geotechnical engineer, the tanks are to be installed with a minimum of 10 feet of cover. This cover requirement allows the storage tanks to be installed both in the lots and within the private street areas as they will be below any proposed subsurface facilities, such as, sewer, water and utility lines.

It should also be noted that the placement of the underground storage tanks would be located at the level of the native soil excavation. In other words, the bottom of storage tank would be at the bottom of excavation. The replacement of soils would be compacted in place above and around the storage tanks and would not affect the infiltration into the existing ground directly below the tanks. The definitive design and type of storage tank will determined during the final grading design process. Thus, impacts would be less than significant and similar to that of the Proposed Project.

#### *Land Use*

Potential impacts associated with physically dividing an established community would be slightly higher under this Alternative when compared to the Proposed Project. Although the existing homes surrounding the Project Site are generally single-family homes rather than multi-family homes, they are not directly equestrian serving and dissimilar to the Equestrian Estates Alternative. In particular, the Proposed Project will be similarly developed to the residential areas to the north, while residential areas to the east of the Project Site are more densely developed with multi-family condominium uses. With that said, the neighboring residential uses are not equestrian in nature, nor do they have the space or acreage per unit to house the use of horses and associated activities in the future. There also exists a retirement facility directly across from the Project Site, which in turn, would slightly divide an established community if equestrian uses are placed on the Project Site. Thus, this Alternative would introduce a use that is not generally common to this particular area of the City. Specifically, the proposed residential uses under

Alternative 5 would introduce a new use to the area that could potentially divide the residential communities to the north and east by placing equestrian uses in mainly a single- and multi-family housing neighborhood. However, equestrian uses are solely an accessory use of the Project Site and would not define the overall character of the Project Site or surrounding area. Therefore, Alternative 5 would not physically divide an established community, similar to the Proposed Project and potential impacts would be less than significant but to a greater degree.

*Consistency with Land Use Plans, Policies and Regulations*

In general, the discussion of potential impacts related to consistency with regional plans under Alternative 5 would be similar to the Proposed Project. Thus, this analysis focuses on the applicable local plans of the City of Los Angeles.

City of Los Angeles General Plan Framework Element

Alternative 5 would provide low-density housing with a similar scale (one- to two-story homes) as those areas surrounding the Project Site. Nevertheless, this alternative would be somewhat consistent with the following goals and objectives in the General Plan Framework Element:

**Goal 3B:** *Preservation of the City's stable single-family neighborhoods.*

**Objective 3.5:** *Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.*

**Discussion:** *Inconsistent.* Alternative 5 does not involve the demolition of any existing residential units. It does include the development of residential homes. The buildings would be spread throughout the entire Project Site with related equestrian uses, which is somewhat consistent with neighboring residential uses, but not fully due to the size of the lots proposed and associated equestrian uses. Thus, this alternative is somewhat consistent with this goal and objective.

**Goal 4A:** *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

**Objective 4.3:** *Conserve scale and character of residential neighborhoods.*

**Discussion:** *Consistent.* One of the objectives of the Proposed Project is to provide a substantial amount of housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley and to help alleviate the substantial housing shortage in the City.

There are a range of land use densities and developments surrounding the Project Site. Residential neighborhoods to the north are low density, however a multiple-acre open space buffer will ensure there is no encroachment on that neighborhood. Residential land uses to the east of the Project Site are of similar density as the alternative. Thus the scale and character of the neighborhoods would be preserved and Alternative 5 is consistent with this goal and objective.

*Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan (Community Plan)*

The Community Plan encourages the preservation and protection of single family areas and existing undeveloped land from encroachment by incompatible uses. In addition, according to ZIMAS, parcels 2572-021-020 and 2572-028-030 are subject to the City's Slope Density Ordinance (No. 162,144). The Slope Density Ordinance permits a maximum density of one unit per acre for areas with an average natural slope between 0% and 15%. For average natural slopes greater than 15%, the allowable density is reduced incrementally to a minimum of 0.05 units per acre. However, as discussed in Section IV.J, Land Use, of the Original DEIR, Footnotes No. 4 and 20 to the Community Plan override the City's Slope Density Ordinance for areas within those parcels with an Average Natural Slope below 15% and permits a density of no greater than allowed for RD-5 zoning (5,000 square feet per unit) for those areas.

Also, according to ZIMAS, parcel 2572-021-017 and a small triangle (400 square feet) of parcel 2572-021-020 is subject to the City's Baseline Hillside Ordinance ("BHO"). The BHO imposes various restrictions on hillside parcels including setback requirements, maximum residential floor areas and grading. However, the affected areas are not being proposed for development making the restrictions of the BHO moot. Based upon the above, the theoretical maximum density potential for the Proposed Project is 274 dwelling units, which, of course, is significantly higher than the 86 units proposed under Alternative 5.

As Alternative 5 represents a significantly lower density development on the Project Site than what is envisioned by the Community Plan for this particular area of the City, there is less consistency with the goals, objectives, and policies of the Community Plan with respect to residential density. Thus, Alternative 5 would not satisfy the cluster opportunity where more undeveloped land is preserved.

Alternative 5 is generally consistent or partially consistent with the applicable policies in the Community Plan yet it is less consistent than the Proposed Project with regard to policies designed to promote open space areas, and that encourage greater housing choices, due to its layout of using large portions of the Project Site. Additionally, the density proposed by Alternative 5 is significantly less than the Proposed Project, and in turn, inconsistent with the density designated by the Community Plan (RD-5 Zoning). Thus, this alternative is less consistent with the Community Plan policy regarding single detached units and residential density than the Proposed Project.

*City of Los Angeles Planning and Zoning Code*

The Project Site has a zoning classification of RA-1 (Residential Agricultural/Suburban, Height District 1) and A1-1 (Agricultural, Height District 1). Please See Figure IV-2, Project Site Zoning, for a list of each APN on the Project Site and its associated zoning. Land uses that are allowed in the A1 zone include single-family residences, parks and playgrounds, golf courses, agricultural uses, and the keeping of horses. Land uses that are allowed in the RA zone include limited agriculture, single-family residences, and home occupations.

In addition, the Project Site is located within a “Hillside Area,” as shown on the Bureau of Engineering Basic Grid Map. LAMC Section 17.05C states that the number of residential units is restricted based on the slope density formula Footnote 4 on the Community Plan Land Use Map. This footnote further clarifies that the slope density formula only applies to areas designated for Minimum density residential land uses, which corresponds to the areas of the Project Site that are within the A1-1 zone. The 12.9 acres within the A1-1 zone have an average slope of nearly 50 percent. Therefore, the allowable density in the A1-1 zone would be 0.5 acres per residential unit, which equates to approximately 0.6 residential units (12.9 acres x 0.05 units per acre).

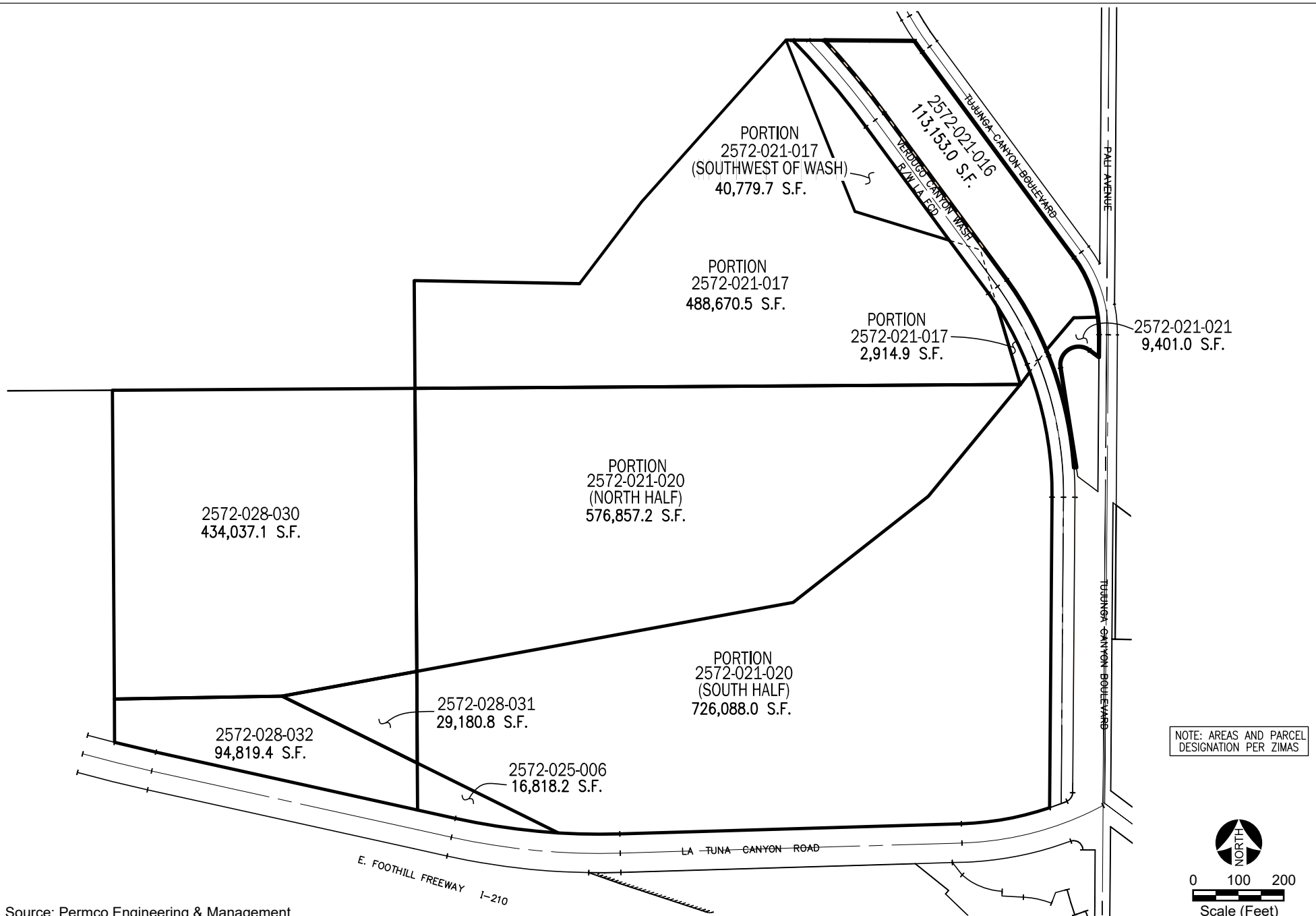
The allowable density within the 44.6 acres of the Project Site that are in the RA-1 zone is 20,000 square feet per unit. Therefore, approximately 97 residential units would be allowed in the RA-1 zone (44.6 acres x 1 unit per 20,000 square feet).

The approximately one residential unit that would be allowed in the A1-1 zone in combination with the approximately 97 residential units that would be allowed in the RA-1 zone would yield a total of approximately 98 residential units. This alternative proposes 86 residential units, which is within the total allowable number of units under the current zoning classifications. Therefore, this alternative would be consistent with the current zoning classifications and impacts would be less than significant.

Even though Alternative 5 would be consistent with the existing zoning classifications, due to the greater permanent loss of open space (which is not consistent with the goals of the Community Plan), this alternative has greater land use and planning impact than the Proposed Project.

Conclusion

Overall, Alternative 5 would not implement policies designed to protect undeveloped land by clustering invigorating development, and, therefore, is inconsistent with the goals and policies of the General Plan and Community Plan. Although some land use policies are generally made consistent with this Alternative, land use impacts associated with Alternative 5 would be less than significant, but in some cases greater, than the impacts associated with the Proposed Project.



Source: Permco Engineering & Management.

## **Noise**

### *Construction*

Although the grading phase for Alternative 5 would be longer than the Proposed Project, the overall construction schedule would be the same as the Proposed Project. Despite a longer grading phase, this alternative would involve the use of the same types of construction equipment as the Proposed Project for the various construction activities (e.g., ground clearing, excavation and grading, installation of utilities, building fabrication, etc.). Thus, similar to the Proposed Project, construction of this alternative would cause a temporary increase in ambient noise levels in the project vicinity above existing levels. This would result in a significant, albeit temporary, noise impact. The construction noise impacts would be reduced to less than significant with compliance with LAMC Noise Ordinance No. 41.40, which restricts construction noise activities to the hours of 7:00 AM to 9:00 PM. Overall, with implementation of the recommended mitigation measures to address construction-related noise impacts in Section IV.L (Noise Section), the construction noise impacts would be similar to those for the Proposed Project and would be less than significant.

Construction activities that would occur under Alternative 5 have the potential to generate low levels of groundborne vibration at the adjacent sensitive receptors. With implementation of the mitigation measures in Section IV.L (Noise Section), impacts would be similar to the Proposed Project's less than significant impacts.

### *Operation*

As Alternative 5 would result in less residential development than the Proposed Project, the amount of human activity at the Project Site would be decreased. Consequently, noise levels from onsite activities and stationary sources (e.g., HVAC systems) would be lower than the Proposed Project and as such, would also not result in any significant operational noise impacts. Overall, operational noise levels under Alternative 5 would result in temporary or periodic increases in noise levels that would be smaller in magnitude than those associated with the Proposed Project.

With less residential development at the Project Site, Alternative 5 would also generate less daily vehicular trips than the Proposed Project. As the Proposed Project's vehicular traffic would not result in any significant noise impacts, the vehicular traffic noise associated with Alternative 5 would also not result in any significant noise impacts.

Furthermore, upon completion of the development under Alternative 5, the new on-site residents would be exposed to noise levels generated by traffic traveling along the existing Foothill Freeway 210 (Foothill Freeway) and La Tuna Canyon Road. To analyze the potential noise impacts from the Foothill Freeway and La Tuna Canyon Road traffic on the proposed residential development, a noise study was conducted by Acoustical Engineering Services, Inc. (AES) to specifically address these noise sources. Based on the results of the noise study, it was determined that the first row of homes as well as some of the proposed

estate lots at the second and third row of homes that are designated in the site plan for Alternative 5 at the Project Site would be exposed to traffic noise levels that would exceed Caltrans' noise abatement criteria of 67 dBA (hourly  $L_{eq}$ ) for residential exterior uses. As such, the following mitigation measures, which have also been recommended for the Proposed Project, would be implemented to address this noise impact on the future residents at the Project Site for Alternative 5:

- **Mitigation Measure J-8:** Sound walls shall be constructed at the locations and heights recommended in the AES traffic noise study for the Equestrian Estates Alternative. Sound walls shall be solid and have minimum 10 lbs/square-foot density.
- **Mitigation Measure J-9:** The design and construction of the residential development shall incorporate all applicable building codes that relate to building sound insulation, including appropriate use of double-glazed windows, as required to reduce the exterior traffic noise to a maximum of 52 dBA ( $L_{eq}$ ) at the interior of residential buildings.

With implementation of these two mitigation measures, the noise impacts from existing traffic noise generated along the Foothill Freeway and La Tuna Canyon Road on the future residents at the Project Site would be reduced to a less than significant level, similar to the Proposed Project.

### ***Population/Housing***

Development under this alternative would, similar to the Proposed Project, involve the development of residential uses on the site. As such, the Project Site is currently a golf course and does not contain any homes or people, this alternative would not result in the displacement of any existing homes or people.

Under Alternative 5, 86 single-family estate lot homes would be developed on the Project Site, 143 fewer dwelling units than under the Proposed Project. As indicated in Section IV.M (Population and Housing) of the Original DEIR, the Community Plan indicates that approximately 2.5 persons are anticipated to occupy each unit within the Low Medium I density land use category in 2010.<sup>8</sup> Based upon this factor, approximately 215 persons would be expected to reside on the Project Site upon the completion of construction, which is 362 fewer people than would occupy the site under the Proposed Project, and impacts would be less than significant and similar to the Proposed Project.

### ***Recreation***

Under the Proposed Project, the payment of Quimby Fees to fund new nearby facilities would not mitigate the loss of the Verdugo Hills Golf Course for the community. Specifically, the addition of homes and increased residents in an area that is already below the LADRP standard for parkland acres, would further the impact on existing facilities. For these reasons, the impact of the Proposed Project on parks and recreational facilities was considered significant.

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<sup>8</sup> City of Los Angeles, Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan, 1997, page III-2.

Similarly, Alternative 5 would not directly contribute to meeting the recreational needs of its new residents through the provision of on-site facilities and amenities, as no public recreational opportunities are proposed under this alternative.

Currently, citywide park space is provided at an estimated rate of 0.76 acre per 1,000 residents, while the Community Plan has a ratio of 0.86 acres per 1,000 people.<sup>9</sup> Therefore, the City meets neither the PRP's desired short-, intermediate-, nor long-range standards. The Project Site is located within a relatively suburban area of the City that has a higher parkland ratio than the City average, but is still below the PRP standard for neighborhood and community park acreage.

Alternative 5 would require the grading of approximately 49 of the 57.45 acres within the Alternative 5 area (86%). While the remaining 8.5 acres of the Project Site acres would not be disturbed by grading, they would be disturbed by fuel modification. With this, preservation of undeveloped land and accommodation of park lands would be lost since:

- Development would occur on steep hillsides (slopes greater than 15 percent);
- Approximately 49 acres of the 57.45 acres of the Project Site would be graded; and
- Development would occur on existing private undeveloped land.

Alternative 5 proposes the removal of the existing golf course, including the loss of 57.45 acres of privately held undeveloped land. Alternative 5 does not propose the donation of publicly accessible undeveloped land. Since Alternative 5 is currently improved with private undeveloped land, the non-dedication of this land would not directly improve the existing neighborhood and community parks to population ratio in the Community Plan Area, as most of the equestrian uses on-site would be private in nature and not available to the general public for use. Thus, impacts would be considered significant and greater than the impacts identified for the Proposed Project.

#### *Quimby Act and City of Los Angeles Municipal Code (LAMC)*

As a residential development, Alternative 5 would be subject to both the State's Quimby Act and the required payment of City Dwelling Unit Construction Tax (DUCT). Based on the preferred parkland per population ratio of four acres per 1,000 persons, the 215 new residents<sup>10</sup> of Alternative 5 would generate a demand for an additional 0.86 acres of new parkland. Alternative 5 does however propose private open space (i.e., equestrian uses) and recreational amenities (i.e., trails, walkways) for the new residents.

As noted above, the Quimby Act allows for the payment of the fees in lieu of parkland dedication for larger residential projects such as Alternative 5. Section 17.12 of the LAMC, the City's parkland

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<sup>9</sup> *Op. cit.*

<sup>10</sup> *Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan, Average Household Sizes (Owner Households) = 2.5 persons per unit x 86 units = 215 persons*



dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through parkland dedication and/or the payment of in-lieu fees. For instance, Alternative 5 would be required to do one of the following: dedicate approximately 0.86 acres of park and recreation space, or pay in-lieu fees of \$5,804 per dwelling unit.<sup>11</sup>

Nevertheless, even with payment of Quimby fees, Alternative 5 would still create a significant and unavoidable impact to recreation, since the entire golf course would be removed and replaced with strictly residential land uses with no parkland for public use. Thus, impacts to recreation would be slightly greater than those identified for the Proposed Project.

### ***Traffic***

Under Alternative 5, a total of 86 residential lots would be developed. These residential lots would be equestrian estate lots and would comply with the minimum lot size of 20,000 square feet and minimum pad size of 11,000 square feet. The site access scheme under Alternative 5 is consistent with that of the Proposed Project (i.e., vehicular access to and from La Tuna Canyon Road).

#### *Alternative 5 Trip Generation Summary*

As the standard Institute of Transportation Engineers' (ITE) *Trip Generation* publication does not provide trip generation rates associated with estate type residential land use, traffic volumes expected to be generated by the proposed residential estate use are based on trip generation rates provided in the San Diego Association of Governments' (SANDAG) *Traffic Generators* publication. Specifically, the residential estates trip generation rates per number of dwelling units from the SANDAG publication were utilized to forecast the traffic volumes expected to be generated by the estate housing component proposed under the Alternative 5.

Alternative 5 is expected to generate a net increase of 32 vehicle trips during the AM peak hour; in contrast with the traffic generation of the Proposed Project, this is 14 fewer inbound trips and 46 more outbound trips. During the PM peak hour, Alternative 5 is expected to generate a net increase of 19 vehicle trips; in contrast with the traffic generation of the Proposed Project, this is 34 more inbound trips and 15 fewer outbound trips. Over a 24-hour period, Alternative 5 is forecast to generate a net increase of six daily trip ends during a typical weekday (three inbound trips and three outbound trips) due to the characteristics of the existing uses on site.

#### *Traffic Impact Comparison*

A qualitative review was conducted to determine the relative traffic impacts of the Equestrian Estates Alternative as compared to the traffic impacts forecast for the Proposed Project. During the weekday conditions, the Equestrian Estates Alternative is expected to generate 89 fewer vehicle trips than the

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<sup>11</sup> Based on the revised fees in accordance with Section 12.12H of the LAMC, effective March 1<sup>st</sup>, 2009, and the fee requirement for per acre density permitted in the R4 zone.

Proposed Project during the AM peak hour. During the PM peak hour, the Equestrian Estates Alternative development is expected to generate 128 fewer vehicle trips than the Proposed Project. Over a 24-hour period, the Equestrian Estates Alternative is forecast to generate 1,160 fewer daily trip ends during a typical weekday.

Based on this comparison, it is determined that the Equestrian Estates Alternative would likely result in an overall decrease in traffic impacts when compared to the Proposed Project during the weekday AM and PM peak hours and impacts would be less than significant.

### ***Public Services - Fire Protection***

The Proposed Project would introduce approximately 577 new residents to the Project Site. Thus, an increase in the demand for fire protection services is anticipated. Under Alternative 5, the 86 single-family homes would introduce approximately 215 new residents to the Project Site. Thus, based upon the number of residents, Alternative 5 has the potential to decrease the demand for fire protection services compared to the Proposed Project.

The provision of adequate fire flows helps to ensure that the development of the Project Site will not overburden fire protection services. As previously discussed, the Water Operations Division of the DWP would perform a fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. Both the Proposed Project and Alternative 5 would be required to provide hydrants, water lines, and water tanks per Fire Code requirements. Therefore, with respect to fire flows, fire protection for both projects would be adequate.

As mentioned in the Original DEIR, the response distance from the first response fire stations does not meet LAMC recommendations, and therefore, is considered inadequate. With respect to response distance and impacts would be potentially significant. However, the requirement to provide automatic fire sprinkler systems in order to compensate for the additional response distance is considered adequate mitigation for both the Proposed Project and Alternative 5. Therefore, both the Proposed Project and Alternative 5 would have similar impacts of less than significant, although Alternative 5 would create potentially fewer impacts based on the significant reduction of single-family homes.

### ***Public Services - Police Protection***

Both the Proposed Project and Alternative 5 would be sources of attractive nuisances, providing hazards, and inviting theft and vandalism during construction. Consequently, both could be expected to provide the same precautions to prevent trespassing through the construction site: temporary fencing installed around the construction site and the deployment of roving security guards. When such common sense precautions are taken, the demand for local law enforcement at the construction site would be less than significant for both projects.

While the Proposed Project would introduce approximately 577 new residents to the Project Site, Alternative 5 would introduce approximately 215 residents. Thus, Alternative 5 would generate less

demand for police protection services than the Proposed Project: the number of requests for assistance calls for police response to retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to be less under Alternative 5.

As previously discussed in the Original DEIR, the LAPD has stated that the Foothill Community Police Station is staffed and equipped to provide full service to the Foothill area, which includes the Project Site, and that the Proposed Project would not result in the need for construction or expansion of police stations or other police protection facilities. As such, no new or expanded police stations would be needed, the construction of which could cause significant environmental impacts, as a result of either the Proposed Project or Alternative 5. Therefore, impacts to police protection services would be less than significant for both the Proposed Project and Alternative 5, although impacts under Alternative 5 would be somewhat less due to overall development size.

### ***Public Services - Schools***

Alternative 5 would introduce approximately 215 new residents to the Project Site while the Proposed Project would introduce approximately 577 new residents. Thus, Alternative 5 would generate less demand for public schools than the Proposed Project.

Both the Proposed Project and Alternative 5 would be served by the following LAUSD public schools: (1) Mountain View Elementary School (K-5) located at 6410 Olcott Street, Tujunga; (2) Mount Gleason Middle School (6-8) located at 10965 Mt. Gleason Avenue, Sunland; and (3) Verdugo Hills High School (9-12) located at 10625 Plainview Avenue, Tujunga. Each of these schools currently has excess enrollment capacity. The Proposed Project would generate a total of 94 public school students, including 46 elementary students, 22 middle school students, and 26 high school students. All of public school students generated by the Proposed Project could be served by the local schools without creating a capacity problem. Therefore, under both the Proposed Project and Alternative 5, potential impacts on schools would be less than significant, as this alternative would propose less residential units. Notwithstanding the less than significant impact, both the Proposed Project and Alternative 5 would be required to pay developer fees to the LAUSD, which would provide full and complete mitigation of any potential school impacts.

### ***Public Services - Parks***

As described above under the Recreation subheading, Alternative 5 impacts to recreation and park uses would be significant and unavoidable, similar to that of the Proposed Project.

### ***Public Services – Libraries***

According to the Los Angeles Public Library, the additional residents generated by the Proposed Project would adversely affect its ability to maintain its current levels of service. Based on the City's standard of 0.5 square feet of facility space per resident, the Proposed Project's 577 new residents would generate a need for approximately 288.5 square feet of library space. These 288.5 square feet of library space are

the approximate equivalent of a 17' x 17' room, the construction of which would not be expected to result in any significant environmental impacts. In contrast, the 215 new residents of Alternative 5 would generate a demand for approximately 108 square feet, which would be the equivalent of a room approximately 10' x 10' in area. With that, the difference in size between the Proposed Project and this alternative would be noticeable. Therefore, under the Proposed Project and Alternative 5, impacts would similarly be less than significant; although Alternative 5 impacts would be comparatively less than those of the Proposed Project.

### ***Utilities –Wastewater***

The existing Verdugo Hills Golf Course facility generates approximately 772 gallons of wastewater per day. The Proposed Project would eliminate the golf course and driving range, and would replace them with 229 single-family homes. Thus, it is estimated that the Proposed Project would generate a net increase of 74,798 gpd of wastewater. In contrast, Alternative 5 would add 86 single-family homes, but it would remove the driving range and golf course. Overall, Alternative 5 would generate a net increase of 27,608 gpd of wastewater, as shown in Table IV-6 below. The overall decrease in sewage generation is accounted for by the lower amount of residential development proposed. While the Proposed Project's impact on sewer systems and wastewater treatment requirements would be less than significant, Alternative 5 would further reduce impacts to the sewage system.

**Table IV-6**  
**Alternative 5 Wastewater Generation**

<b>Land Use</b>	<b>Size</b>	<b>Generation Rate <sup>a</sup></b>	<b>Net Daily Wastewater Generation (gpd)</b>
Single-Family Homes	86 du	330 gallons/du	28,380
Golf Course Facilities (removed)	-9,650 sf	80 gallons/1,000 sf	-772
<b>Alternative 5 Net Total</b>			<b>27,608</b>
<i>Notes:</i> <i>du=dwelling unit; sf = square feet</i> <i><sup>a</sup> Source: Brent Lorscheider, Acting Division Manager, City of Los Angeles Department of Public Works, Bureau of Sanitation, January 23, 2008.</i>			

### ***Utilities – Water Supply***

The Proposed Project would generate a net increased water demand of 36,164 gallons per day. This amount includes netting out the existing golf course and driving range. Because Alternative 5 would be oriented toward equestrian uses, the site design would be reconfigured to allow for 86 single-family home lots and associated equestrian facilities. As a result, development of Alternative 5 would decrease daily water demand on the Project Site by approximately 2,108 gallons per day when compared to the Proposed Project. Thus, Alternative 5 proposed water usages would be slightly lower than the Proposed Project and lower than the existing golf course uses on the Project Site. Quantifiably, Alternative 5 would

decrease water consumption, which would constitute a less than significant impact since Alternative 5 is considered consistent with the Community Plan's project density for the Project Site.

Nevertheless, Alternative 5 could potentially increase overall water consumption at the Project Site in comparison to the Proposed Project. More specifically, when compared to the Proposed Project, the projected equestrian uses would most likely increase water usage above what would normally be consumed at the Project Site by standard single- and multi-family residential land uses. But with that said, Alternative 5 would provide a use that is well below the suggested density for the area, which would reduce residential water consumption at the Project Site when compared to the Proposed Project. Nevertheless, the LADWP has stated that there are no known water service problems in the area and that the treatment plant could adequately handle the wastewater generated by the Proposed Project. But with that said, impacts to water supply under Alternative 5 would be less than significant, albeit considered higher than the overall quantifiable impact identified above, when compared to the Proposed Project due to proposed equestrian uses.

### ***Utilities – Solid Waste***

As with the Proposed Project, Alternative 5 would generate a short-term, construction-related waste stream to one or both of the two identified landfills serving the development area. Because each of these landfills has sufficient remaining capacity to accommodate the construction waste stream, and because Alternative 5 would be required to divert 50% of its waste stream from landfills, the construction-related impact of Alternative 5 would be less than significant.

It is estimated that the Proposed Project would generate approximately 2,801 pounds<sup>12</sup> of solid waste on a daily basis, one half of which would be diverted to recycling and only 1,400 pounds would be directed to a landfill. Because there is adequate short-term capacity at these landfills, the Proposed Project's impact on remaining landfill capacity is considered less than significant. In comparison, Alternative 5 would generate 1,052 pounds<sup>13</sup> of solid waste, (not including 17,200 pounds of horse manure<sup>14</sup>, assuming each home has four horses) of which 526 pounds would be recycled and 526 pounds would be directed to a landfill. The horse manure would also need to be properly stored when excess manure is not needed to be applied to land or vegetation cover. A typical rule of thumb is to be able to store approximately 180 days worth of manure. While Alternative 5 may generate more solid waste than the Proposed Project, the magnitude of this impact would not be considered significant because there is adequate short-term

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<sup>12</sup> *Estimated Solid Waste Generation Rates for Residential Developments website: <http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/Residential.htm>. 229 homes x 12.23 lbs = 2,801 lbs.*

<sup>13</sup> *Estimated Solid Waste Generation Rates for Residential Developments website: <http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/Residential.htm>. 86 homes x 12.23 lbs = 1,052 lbs.*

<sup>14</sup> *Virginia Tech, Horse Manure Management article, website: <http://pubs.ext.vt.edu/406/406-208/406-208.html>. "On any given day, the average 1,000-pound horse will produce approximately 50 pounds of manure." 86 homes x 4 horse = 344 horses. 344 horse x 50 lbs = 17,200 lbs per day*

capacity at the identified local landfills. Nevertheless, when compared to the Proposed Project, potential impacts would be greater under this Alternative.

## **2. ALTERNATIVE VI – WALKABLE VILLAGE ALTERNATIVE (PREFERRED PROJECT)**

Alternative 6 is a lower density residential alternative which is being provided in response to comments asserting that the Original DEIR needed to assess an alternative project that reduced potential impacts disclosed in the Original DEIR. Alternative 6 would replace the existing golf course and driving range with a housing development and associated infrastructure and amenities, and also involve the potential public dedication of 28.4 acres of undeveloped land.

As mentioned, Alternative 6 is an all residential development consisting of 221 homes on the 57.45-acre Project Site (approximately 3.79 units per acre (see Figure IV-1)). Lot sizes would range from 2,768 to 10,530 square feet in area. The proposed homes would range in size from 1,800 to 2,700 square feet in building area and have a maximum height of 30 feet (two-stories). Six basic models are proposed: 83 units would have four bedrooms while 138 would have three bedrooms. Each home would have a two-car garage.

The proposed 221 homes would be built in two locations. Most of the homes would be built in the southeast corner of the Project Site, on the portion of the property currently occupied by the Verdugo Hills Golf Course. Additional homes would be built farther to the north, between the Verdugo Wash right-of-way on the west and Tujunga Canyon Boulevard on the east. This smaller enclave would be accessed via a private street connecting to Tujunga Canyon Boulevard. The existing crossing of the Verdugo Wash would be used for pedestrian access to onsite open space, trails, and walkways.

### ***Site Design/Open Space***

The Alternative 6 development plan locates the majority of the proposed homes on the flattest portion of the Project Site (i.e., that portion currently developed as the Verdugo Hills Golf Course). Areas within the Project Site with average slope gradients greater than 15 percent are proposed to be set aside under conservation easements. In total, Alternative 6 would include 31.1 acres of undeveloped land potentially available for public dedication. Of this total, approximately 14.50 acres would be retained in its current undisturbed condition, while the remaining 16.6 acres would be subject to modification due to the City's fuel modification requirements. In addition, Alternative 6 would provide 3.25 acres of on-site amenities and private open space, which would be maintained by the proposed homeowners' association.

### ***Tree Removal and Replacement***

There are currently 441 trees on the Project Site: 303 coast live oaks, 18 western sycamores and 120 non-native mature ornamental trees. Alternative 6 would involve the removal of 148 of these trees: 29 coast live oaks, 10 sycamores and 109 ornamentals. To mitigate for the loss of these trees, Alternative 6 would replant 116 coast live oak (*quercus agrifolia* variation *agrifolia*) trees, 40 western sycamores and 109 natives from approved container stock. These replacement plants represent a 4:1 replacement ratio of

coast live oaks (*quercus agrifolia* variation *agrifolia*), a 4:1 replacement ratio of western sycamores and 94 non-protected ornamentals species.<sup>15</sup>

### ***Construction Schedule***

The construction schedule for Alternative 6 would be the same as that of the Proposed Project, with the exception of the grading phase which would be approximately six months. In comparison, the grading for the Proposed Project is estimated to be approximately two months.

### ***Project Site Access/Parking***

Site access for vehicles would be provided from two electronic gated entrances located along La Tuna Canyon Road (Streets “A” and “F”), and one entrance along both Tujunga Canyon and Pali Avenue. The gated vehicle entrances along La Tuna Canyon Road would have a width of 48 feet and sufficient length (approximately 80+ feet) to accommodate vehicle queuing. Beyond the entrances, both Streets “A” and “F” would narrow to a 28-foot width. All the remaining internal streets (i.e., Streets “B” through “R”) have a range of widths from 20’ to 28’. The houses on the northeast side of Verdugo Wash would be accessed via a private road (Street “S” – width of 20’ to 28’) off of Tujunga Canyon Boulevard.

Within Alternative 6, there would be no on-street parking. Guest parking would be accommodated in off-street parking spaces distributed throughout the development area. In total, Alternative 6 would provide 111 uncovered guest spaces, which is at 0.5 guest space per lot. Overall, Alternative 6 would construct 4.5 acres of pavement, consisting of streets and parking areas, and up to 5.4 acres of pavement when including driveways and walks.

### ***Grading Concept***

The proposed homes would be built on approximately 29.05 acres of the Project Site (approximately 51.5 percent of the net site area) that would be disturbed by grading and construction activities. This grading disturbance area is referred to as the Alternative’s “grading footprint”. Prior to construction, site preparation would require approximately 448,000 cubic yards of excavation and recompaction. Of this, there would be approximately 110,000 cubic yards of raw cut and 338,000 cubic yards of over-excavation and recompaction. Given the emplacement and recompaction of the 338,000 cubic yards of on-site excavation and an estimated shrinkage ratio of approximately 10 percent, the earthwork is expected to balance on-site and no import or export will be required.

### ***Discretionary Approvals***

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<sup>15</sup> City of Los Angeles, Bureau of Street Services, Urban Forestry Division:  
<http://bss.lacity.org/UrbanForestry/Developer.htm>



Alternative 6 would conform to the land use designation in the General and Community Plans for the Project Site. Alternative 6 would also bring the zoning into conformance with the General and Community Plan. To note, the proposed Zone Change is part of this Alternative as well as the Proposed Project. Alternative 6 requires the following discretionary approvals:

- A Vesting Zone Change, pursuant to Section 12.32 of the Municipal Code, from RA-1 (Residential Agricultural Zone) and A1-1 (Agricultural Zone) to RD5-1 (Restricted Density Multiple Family Zone)
- Approval of a Vesting Tentative Tract Map and compliance with Small Lot Subdivision Ordinance, pursuant to Section 12.22-C, 27, which will subdivide the Project Site into single-family lots.
- Site Plan Review findings, pursuant to Section 16.05 of the LAMC, for a development project which creates, or results in an increase of 50 or more dwelling units.
- Project Compliance Review, pursuant to Section 11.5.7 C, for a development within the San Gabriel/Verdugo Mountains Scenic Preservation Plan Area.

#### ***Relationship to Project Objectives***

Alternative 6 would satisfy the following project objectives as listed in Section III. Project Description of the Original DEIR:

- To provide housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley and to help alleviate the substantial housing shortage in the City.
- To provide greater regional housing opportunities for homebuyers and assist in satisfying the housing needs for the region.
- To invigorate the local economy by providing employment and business opportunities associated with the construction, use, and occupancy of the Proposed Project.
- To locate the residential development in proximity to existing infrastructure and services where possible.
- To provide safe and efficient streets in the residential development with convenient connections to adjoining arterials and freeways, while minimizing traffic impacts on existing residential neighborhoods.
- To minimize impacts to important natural landforms and significant natural resources.

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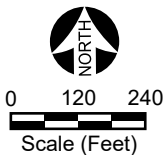


Figure IV-3  
Preferred Project Alternative

## Environmental Impacts

### *Aesthetics*

The Project Site is visible in the foreground of scenic vistas available from La Tuna Canyon Road and Interstate 210. See Photo exhibit. Although future development would be visible from various vantage points as discussed below, Alternative 6 is in compliance with the Community Plan which envisions residential uses for the Project Site and minimizes impacts on visual character and views compared to the Proposed Project. Alternative 6 would reduce aesthetic impacts to scenic vistas from both Interstate 210 and La Tuna Canyon Road (designated scenic highways), compared to the Proposed Project. The impacts would be reduced by the revised approach to the topography and by extensive landscape tree screens. Also, while the Proposed Project is terraced and steps down towards La Tuna Canyon Road, Alternative 6 proposes a valley surrounded by trees. Alternative 6 is clustered in the southern portion of the Project Site and stretches horizontally in a linear fashion. Therefore, Alternative 6 will decrease the significant Aesthetic impacts to scenic vistas, when compared to the Proposed Project.

- The Proposed Project would retain 28.4 acres of undeveloped land potentially available for public dedication. Of this total, approximately 14.5 acres would be retained in their current undisturbed condition, while the remaining 16.6 acres would be subject to modification due to the City's fuel modification requirements. In contrast, the Alternative 6 site layout has been designed to restrict the development disturbance area to those portions of the Project Site that have been previously disturbed and/or have average slope gradients of less than 15 percent. Approximately 27.64 hillside acres with average slope gradients greater than 15 percent would be set aside under conservation easements and would be available for public dedication.
- The Proposed Project would grade and cause landform alterations to 25.8 acres in a terraced and stair stepped fashion. In contrast, the finished graded site of Alternative 6 would be closer in conformance with the existing land pattern north of La Tuna Canyon Road and West of Tujunga Canyon Boulevard. The majority of the terracing would occur in the rear yards of the lots. The grading plan's avoidance of the steeper hillsides (average gradients greater than 15 percent) would partially retain the existing native vegetation on the Project Site.
- The removal of existing trees in the golf course area would be reduced with implementation of Alternative 6 when compared to the Proposed Project. Of the 303 oak and 18 western sycamores included in the Tree Survey (see Appendix F-2 of the Original DEIR), 29 oaks and 10 western sycamores would be removed, along with 109 ornamentals.

As indicated in the Original DEIR's Transportation and Parking section, the City of Los Angeles is requiring the Proposed Project to expand/widen the western part of Tujunga Canyon Boulevard right-of-way by about 12 feet (Alternative 6 widens by 32 feet) to the west or 45 feet total from the existing centerline versus 52 feet for Alternative 6. This alternative would also set back proposed structures and development along La Tuna Canyon Road behind vegetation and an associated wall and hedge. This

would run along the southern site edge, and as proposed, would become apparent as a vegetation screen along La Tuna Canyon Road. It would correspond to the street grade elevations, in order to provide visual cover for the single-family residences. Specifically, the following Project Design Features (PDFs) relating to aesthetics have been identified for Alternative 6:

**PDF-1** All fences, gates and walls visible from Interstate 210 or La Tuna Canyon Road shall be constructed of one or more of the following materials: local river veneer, rough-cut, unfinished wood; native-type stone; textured plaster surface walls; black or dark green chain link; wrought-iron in combination with small-gauge tubular steel posts.

**PDF-2** The project developer shall prepare and implement a landscape plan that provides planting and maintenance guidance for common landscaped areas and manufactured slopes. The project developer shall be responsible for the plan's implementation until such time as a homeowners' association assumes responsibility for landscape maintenance. The landscape plan shall be subject to the review and approval by the Department of City Planning prior to issuance of any grading permit. To ensure its implementation and maintenance, the landscape plan shall be incorporated into the project's CC&Rs. Major features of the landscape plan shall include:

- City of Los Angeles Green Building Ordinance (Ord. 179820).
- A listing of plant species appropriate for use for both temporary slope stabilization purposes and long-term landscaping designs for common areas. The plan shall emphasize the use of drought-tolerant, fire retardant, native plant species. Only non-invasive plant species shall be included in the listing of acceptable non-native planting materials. In addition, wherever practical, plants which are relatively pest resistant and which require a minimum of added nutrients shall be utilized in landscaping.
- Retention of a landscape contractor thoroughly familiar with the provisions of the landscape plan, by the project's homeowners' association, for ongoing implementation of the Landscape Plan.

**PDF-3** All roofs visible from Interstate 210 and La Tuna Canyon Road shall be surfaced with non-glare materials and no equipment shall be placed thereon. This provision shall not apply to solar energy devices and satellite dishes.

**PDF-4** Where feasible, drainage devices (terrace drains, benches and intervening terraces) visible from surrounding areas shall be bermed and placed in swales.

**PDF-5** Concrete drains and all other drainage devices shall be tinted with an appropriate earth tone to effectively conceal them from surrounding views.

- PDF-6** All outdoor light fixtures shall limit light trespass and glare through the use of shielding and directional lighting methods, including, but not limited to, fixture location and height.
- PDF-7** In general, exterior lighting pole heights shall not exceed approximately fifteen (15) feet in height.
- PDF-8** Outdoor light fixtures used to illuminate landscaping, flags, statues, or any other objects mounted on a pole, pedestal, or platform shall use a very narrow cone of light for the purpose of confining the light to the object of interest and minimize spill-light and glare.
- PDF-9** All exterior lights and illuminated signs shall be designed, located, installed and directed in such a manner as to prevent unwanted light at the property lines and glare at any location on or off the property. No permanently installed lighting shall blink or flash. All lighting fixtures shall be appropriate in scale, intensity, and height to the architectural design values and building uses proposed.
- PDF-10** Landscaping shall be provided in areas where plantings can reduce visible glare and enhance natural surroundings.
- PDF-11** Lighting fixtures located along La Tuna Canyon Road and Tujunga Canyon Boulevard and all interior project streets shall be fitted with glare shields or be cut-off type fixtures (i.e., a type of streetlight with no light emitted above horizontal, no light dispersion or direct glare to shine above a 90-degree, horizontal plane from the base of the fixture).
- PDF-12** Lighting fixtures intended for security purposes shall be equipped with motion sensors.
- PDF-13** There shall be no night illumination of open space proposed to be preserved by conservation easements.

It should be noted that because of the large number of possible visual perspectives of the Project Site, it is not feasible to document each potential location that could experience visual character or view impacts. This section analyzes potential visual character and view impacts of Alternative 6 from seven (7) different local viewshed areas that surround the Project Site. View photographs that depict visual perspectives of the viewshed areas analyzed support this analysis. All figures are located at the end of this Alternatives section for ease of reading and review. It should be noted, while the locations selected for the visual photographs are representative of the respective viewshed areas, they do not reflect every possible individual view perspective within each viewshed area.

#### *Local Viewshed Area 1 – Honolulu Avenue*

#### Aesthetics/Visual Character

Views of the Project Site from westbound vehicles on Honolulu Avenue first occur in the vicinity of the westbound on-ramp to the Interstate 210 Freeway, approximately one-half mile east of the Project Site.

Development on site would involve the construction of multiple single-family residential structures up to 30-feet in overall height. Because of intervening terrain and vegetation, the visual character of the Project Site and surrounding areas are that of the driving range fencing and surrounding hillsides. The interior of the golf course is not clearly visible from vehicles on Honolulu until they approach the Project Site. Views of the undeveloped southerly portion of the Site are first visible from this geographic area.

The proposed Alternative 6 land use would be consistent with the visual character of adjacent neighborhood to the east of Tujunga Canyon Boulevard and north of Honolulu Avenue. The overall visual character of the Project Site with implementation of Alternative 6 would be that of a single-family residential neighborhood, buffered by existing and proposed trees along all street frontages. Additionally, Alternative 6 would be screened from Tujunga Canyon Boulevard, which would serve as a visual buffer for views of the Project Site. The removal of the existing golf course fencing, parking lot, and associated lights, would help create an environment that is consistent with its surroundings. The height of Alternative 6 buildings would also be consistent with the building heights of the uses in the surrounding area.

### Views

As mentioned above, most views from this viewshed area would be from the roadway while traveling west on Honolulu Avenue. There are no foreground views of valued visual resources from this viewshed area. For the segment of this viewshed area where Honolulu Avenue intersects Tujunga Canyon Boulevard, to the southwest there are long-range view of the Project Site along La Tuna Canyon Road and Tujunga Canyon Boulevard. Long-range views are momentary as one drives along Honolulu Avenue and in the periphery of the viewshed. Additionally, as one moves further north on Honolulu Avenue, the street begins to travel upward to a higher elevation, thereby limiting potential roadway views of the hillsides to the north of the Project Site until one is towards the southern portion of the Project Site where the hillsides come into view. Therefore, there are no background views of valued visual resources from this particular area of Honolulu Avenue.

### *Local Viewshed Areas 2 & 3 – La Tuna Canyon Road West & East*

### Aesthetics/Visual Character

The elimination of the existing golf course and its replacement by housing screened by vegetation will introduce a land use that is consistent with the visual character of areas to the east of Tujunga Canyon Boulevard. Although the proposed land use would differ from what exists currently, the effect of Alternative 6 (i.e., the introduction of a suburban development adjacent to a residential community) would not substantially degrade the existing visual character of the area and would not compromise the character of La Tuna Canyon Road. The overall visual character of the Project Site with implementation of Alternative 6 would be that of a residential neighborhood buffered by existing and proposed trees along all street frontages.

In addition to landscape buffers, the proposed development would be setback from the property line and

oriented away from street frontages, both of which would serve as an additional buffer for those with views of and towards the Project Site. Alternative 6 would contain residential single-family homes that are 30-feet in overall height, which is within the height limitations and zoning regulations for the Project Site.

### Views

Due to intervening terrain and changes in elevations, the first view of the Project Site from eastbound vehicles on La Tuna Canyon Road does not occur until approximately one quarter of a mile to the west of Tujunga Canyon Boulevard. However, dense landscaping and native vegetation largely block views into the northern and western portions of the Project Site. From intermittent glimpses between the vegetation, travelers see only portions of the golf course. Clear views into the interior occur from the club house east to the Tujunga Canyon Boulevard intersection. Foreground views of the parking lot and the driving range predominate. Westbound views of the Project Site from La Tuna Canyon Road begin at its intersection with Tujunga Canyon Boulevard. At the intersection, the Verdugo Wash, the golf course's paved parking lot, its low slump-stone wall and sparse landscaping dominate foreground views.

To the west of the driving range, the club house can be seen in the midst of a dense grove of mature oak trees. Alternative 6 would develop the Project Site with two-story single-family residences and vegetation, thereby partially obstructing views of areas to the north and northeast of the Project Site from public viewing locations along La Tuna Canyon Road. However, as previously discussed, there are no clear sight lines through the Project Site to any areas north of the site that are considered unique or valued.

### *Local Viewshed Area 4 – Tujunga Canyon Boulevard Middle*

### Aesthetics/Visual Character

Similar to other viewshed areas discussed above, because of terrain, vegetation, and street geometry, the golf course/driving range is not clearly visible from vehicles on Tujunga Canyon Boulevard until they are near the Project Site. Views of the undeveloped northerly portion of the site located between Tujunga Canyon Boulevard and the Verdugo Wash are first visible from about Fehlhaber-Houk Park. The current driving range and its tall chain-link fencing dominate the foreground views and visual character of the Project Site from Tujunga Canyon Boulevard. The view of the Project Site is affected by the tall driving range fencing.

As mentioned above, the elimination of the existing golf course and its replacement by housing will introduce a land use that is consistent with the visual character of areas to the east of Tujunga Canyon Boulevard. Although the proposed land use would differ than what exists currently, the effect of Alternative 6 would not substantially degrade the existing visual character of the site and would not compromise the character of Tujunga Canyon Boulevard. The overall visual character of the Project Site with implementation of Alternative 6 would be that of a single-family residential neighborhood, buffered by existing and proposed trees along all street frontages, and in particular, Tujunga Canyon Boulevard

and La Tuna Canyon Road. In addition, Alternative 6's orientation away from street frontages would be in keeping with the visual character of surrounding neighborhoods and the Tujunga Canyon corridor. The proposed buildings would also be set back 15-feet to 30-feet along Tujunga Canyon Boulevard and 25-feet to 45-feet along La Tuna Canyon Road from the property line, which would serve as an additional buffer for those with views of and towards the Project Site. Lastly, Alternative 6 would contain residential single-family homes that are 30-feet in overall height, which is within the height limitations and zoning regulations for the Project Site.

### Views

Currently, occupants of vehicles and pedestrians on Tujunga Canyon Boulevard have views looking west across the driving range toward the golf course, the onsite oaks and the largely undisturbed hillsides. More southerly views include the mountainous open space on the south side of Interstate 210 freeway and the oak woodland on the south side of La Tuna Canyon Road. The tall fencing surrounding the driving range and the poorly maintained concrete Verdugo Wash Channel in the foreground, which is immediately adjacent to Tujunga Canyon Boulevard, diminishes the quality of these views.

Tujunga Canyon Boulevard is not a designated scenic highway although it does afford scenic vistas of the Verdugo Mountains to the south and west, and of the San Gabriel Mountains to the north and east. Because of intervening terrain and vegetation, views of the golf course/driving range are not clearly visible from southbound vehicles on Tujunga Canyon Boulevard until they approach the Project Site. Views of the undeveloped northerly portion of the site located between Tujunga Canyon Boulevard and the Verdugo Wash are first visible from about Fehlhaber-Houk Park. Construction of the evenly spaced homes would partially block southwesterly views from the adjacent stretch of Tujunga Canyon Boulevard. Construction of the proposed homes on the driving range portion of the Project Site would partially eliminate existing views of the oaks on the Project Site and to the south of La Tuna Canyon Road. Alternative 6 would screen housing units, which would lessen the impact to visual quality of the site through development of a contemporary, well-designed residential community with appropriately placed trees and landscaping buffers. Specifically, developing this Project Site would require the replacement of the driving range protective fencing and replacement with new vegetation screen along the west edge of Tujunga Canyon Boulevard. The proposed foliage would screen the Project Site from view.

*Local Viewshed Area 5 & 6 - Tujunga Canyon Boulevard Northeast of Main Parcel and Northeast of North Parcel*

### Aesthetics/Visual Character

The area southeast currently commands a panoramic view of the site itself, the driving range, and hillsides in a southerly direction over the Project Site, with the Project Site located within roughly 40 to 50 percent of this viewshed. As this area is located at a higher elevation and at a distance from the Project Site, the Project Site blends with surrounding development and topography and is not prominent from this area. As discussed under Section 2.0 (Environmental Setting), there is very limited visibility of the



existing developed portions of the Project Site due in part to the large distance between this viewshed area and the existing on-site golf course and the presence of considerable landscaping. As such, Alternative 6 development would not result in a substantial change in contrast when viewed from this viewshed area.

Alternative 6 would add structures within the very southern portion of the Project Site. Due to topography and existing vegetation, however, only the upper levels of future Alternative 6 structures would be slightly visible within the overall viewshed from the upper portions of this viewshed area. Some locations within this northern Tujunga Canyon Boulevard area could potentially see structures rising above existing ridgelines; however, these structures would not be prominent in the context of the entire viewshed. Many of the homes within this area have very broad background views across and over the Project Site and of the areas behind the Project Site to the south and west. Given a very large proportional field of view from these locations, Alternative 6 would not create a substantial impact with regard to coverage, since only a small portion of the available view towards and over the Project Site would have the potential to be obstructed. Also contributing to the limited effect of coverage is the abundance of mature trees (that are to remain) within this area that already blocks most views to the south.

### Views

The upper portions of the Tujunga Canyon Boulevard area currently have intermittent background views in a southerly direction over existing suburban areas. As shown in the figures below, no other long-range view resources are visible from this geographic area.

Alternative 6 as viewed from this area would include residential structures that would enter into the current skyline view. Due to the abundance of mature trees within this area that already block most views to the south, Alternative 6 and potential amenities would not contribute substantially to the blockage of distant long-range views of valued resources from this area. For those locations with broad background views across the Project Site, Alternative 6 would only occupy a small portion of the available view towards the Project Site. As such, Alternative 6 development would have a limited impact, as a substantial change in prominence and coverage would not occur, and nearly all of the hillside views would still be visible.

### *Local Viewshed Area 7 - Tujunga Canyon Boulevard Southeast of North Parcel*

#### Aesthetics/Visual Character

From its elevated and distant location, the area southeast of the north parcel currently commands views of mostly the road itself and adjacent hillsides. The Project Site can be seen from the roadway and from areas across the street; however, views are very limited and narrow. Available views are generally middle ground in nature, with background views across and over the Project Site. Foreground views consist of neighboring residential structures and the street itself.

Similar to Local Viewshed Area 5, the most prominent portions of the Project Site that can be seen

include mostly the western edge of the site with intermittent interior site views. The western and southern areas of the Project Site are generally not visible from this area. Alternative 6 would result in an increase in the overall amount of urban development, as viewed from this area. However, this new development would be screened by hedges and trees and would be consistent with the City regulations for the area, would not contrast with the existing urban development visible from this area, and would not be substantially more prominent than existing developments within the available field of view.

In addition, a wide field of view would remain visible from vantage points in this area with a viewshed of the Project Site, and therefore, would not create a substantial impact to the overall coverage of the available view. Specifically, as one travels upward in a westerly direction adjacent to the Project Site, the field of view changes dramatically, with the Project Site making up a very small portion of the available field of view. Additionally, the elimination of the existing golf course and its replacement by housing will introduce a land use that is consistent with the visual character of areas to the east and south of the Project Site.

### Views

Similar to Local Viewshed Area 6, upper portions of the Tujunga Canyon Boulevard area currently have intermittent background views in a southerly direction over existing suburban areas. As shown in the figures below, no other long-range view resources are visible from this geographic area. Alternative 6 development as viewed from this area would include residential structures that would enter into the current skyline view. Due to the abundance of mature trees within this area that already block most views to the south, Alternative 6 and potential amenities would not contribute substantially to the blockage of distant long-range views of valued resources from this area.

#### *Views of the Project Site from Vista Points, Equestrian/Hiking Trails, and Interstate 210 Freeway*

As previously discussed, the Project Site is not visible from the La Tuna Canyon vista point; consequently, the project would have no effect on scenic vistas from this public location. Also, there are no official or non-public equestrian trails depicted on the Specific Plan trail maps in Alternative 6 vicinity; therefore, Alternative 6 would have no effect on scenic vistas visible from equestrian/hiking trails depicted on those maps. However, there are trails on the south side of La Tuna Canyon to the west of the Project Site that are not shown on the Specific Plan's trail maps from which the Project Site may be visible. Aesthetic impacts to those trails would vary depending upon the orientation of those trails, the extent of intervening terrain and vegetation and the distance separating the Project Site from any such trail. Overall, the visual character of Alternative 6 as viewed from the 210 Freeway would not conflict with any established community aesthetics and would be representative of the diversity of properties that exemplify this area of the freeway. As shown in Exhibit A and B, Video of Interstate 210 Freeway Eastbound and Video of Interstate 210 Freeway Westbound, passengers traveling west and east (to a lesser extent) on the freeway have infrequent uninterrupted views of the golf course, driving range and surrounding onsite hillsides in a northerly direction. The extent of the existing onsite tree canopy (both native and landscape trees) is prominently visible during the daytime. Unlike the view from the adjacent

portion of La Tuna Canyon Road, the freeway's elevated position permits passengers to look over the golf course to see the San Gabriel Mountains and a portion of the La Crescenta Valley in the background. The freeway's elevated position prevents eastbound traffic from seeing this Alternative. Alternative 6 provides extensive vegetation screening of the site. As such, Project impacts in relationship to the westbound visual environment of this area would be less than significant and less than the significant and unavoidable impact identified for the Proposed Project in the Original DEIR.

### *Light and Glare*

#### Construction

Lighting needed during Alternative 6 construction could generate light spillover to off-site sensitive land uses in the Alternative 6 vicinity, including the adjacent residential uses to the east. However, construction activities would occur in accordance with the provisions of the Los Angeles Municipal Code Section 41.40. Therefore, most construction lighting would be used primarily during late afternoons in the winter season, would only occur for the duration needed in the construction process, and only during those work hours permitted by the LAMC. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Thus, with adherence to LAMC regulations, light resulting from construction activities would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, or interfere with the performance of an off-site activity. Therefore, light impacts associated with construction would be less than significant and similar to that of the Proposed Project.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities within each development site. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. The potential for nighttime glare associated with construction activities is unlikely as most construction activities would occur during the day, and any nighttime construction work would be temporary. As such, Alternative 6 would not result in a significant impact related to construction glare and impacts would be similar to those identified in the Original DEIR for the Proposed Project.

#### Operation

Glare is not anticipated, as the proposed residences would have stucco, wood, stone and/or brick and block facades. Windows would not be highly reflective. All new light generated by Alternative 6's operation would be similar to that generated by typical single- and multi-family communities and would not significantly affect light-sensitive land uses by introducing new sources of light or glare that could have substantial adverse effects on day or nighttime views in the area.

Alternative 6 would remove all of the high-intensity lighting fixtures on the Project Site that currently

illuminate the golf course, the driving range and the associated facilities. This would eliminate a major source of glare visible from both the Interstate 210 Freeway and La Tuna Canyon Road, as well as from Tujunga Canyon Boulevard. However, similar to the Proposed Project, existing lighting would be replaced with new lighting, including streetlights, landscape and security lighting, window glow and vehicle headlights. Although street lighting has the potential to be a new source of substantial light or glare which could adversely affect nighttime views in the areas, Alternative 6 impacts would be (less than) significant and similar to those identified in the Original DEIR for the Proposed Project.

#### *Shade and Shadow*

Due to the location of the Project Site and the proposed height of structures, shade and shadow impacts are not considered relevant. Particularly, shadow impacts are typically greatest during the winter months due the sun's low position in the sky, with the resultant longer shadows stretching roughly from the northwest to the northeast during daytime hours. As a result, due to the areas north of the Project Site being at a higher elevation and the areas to the east being located across a drainage channel and street, no impacts are expected to occur.

#### *Conclusion*

Overall, existing views of the driving range, golf course, and the surrounding hillsides would be replaced by intermittent views of the newly constructed single-family homes. Vegetation and a wall running along the eastern edge would become apparent as they correspond to the street elevation in order to provide visual cover for the single-family residences. Since Alternative 6 would not result in a substantial adverse impact to a prominent view resource; Alternative 6 impacts would be less than significant and less than the significant and unavoidable impact identified for the Proposed Project.

Below is a list of Regulatory Compliance measures that the Alternative should comply with in order to help offset any potential impacts that could occur.

- RC-1** All structures on the Project Site shall comply with the applicable requirements of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan.
- RC-2** All utilities installed in connection with the development of the new subdivision shall be placed underground.

#### *Air Quality*

The analysis for Alternative 6 follows the same methodology as the analysis performed in the Original DEIR Air Quality Section IV.C, and is compared to the Proposed Project as well as all applicable thresholds.

*Consistency with the 2012 AQMP*

Alternative 6 is consistent with the projections of employment and population forecasts identified in the Growth Management Chapter of the RCPG and are considered consistent with the AQMP growth projections, since the Growth Management Chapter forms the basis of the land use and transportation control portions of the AQMP.

Implementation of Alternative 6 would not directly or indirectly induce substantial population or employment growth beyond current growth projections. Because this alternative would be consistent with the regional population forecasts for the City of Los Angeles, it would not jeopardize attainment of State and national ambient air quality standards in the Basin and the Los Angeles County portion of the Basin.

Construction Period Emissions – Mass Daily Emissions

During construction of Alternative 6, the same five basic types of activities identified for the Proposed Project would be expected to occur and generate emissions. However, Alternative 6 would reduce import truck trips by approximately 7,500 to 8,000 trips. Also, it is assumed that the pieces of equipment for each construction activity would be the same as the Proposed Project.

Construction emissions are calculated using the CalEEMod 2013.2.2 computer model developed by the SCAQMD by estimating the types and number of pieces of equipment that would be used to remove existing facade, excavate the project site, and construct the proposed development. Construction emissions are analyzed according to the regional thresholds established by the SCAQMD and published in the CEQA *Air Quality Handbook*. The construction activities associated with Alternative 6 would cause diesel emissions, and would generate emissions of dust. Construction equipment within the Project Site that would generate criteria air pollutants could include excavators, dump trucks, and loaders. Some of this equipment would be used during demolition activities as well as when structures are constructed on the Project Site. In addition, emissions during construction activities include export truck trips off-site to remove debris and delivery truck trips during the demolition phase. CalEEMod evaluates all diesel-powered equipment used during construction activities.

During construction of Alternative 6, six basic types of activities would be expected to occur and generate emissions. First, the existing structures would be demolished. Second, the development site would be prepared and excavated. Third, the site would be graded to accommodate building foundations. Fourth, the proposed residential units would be constructed. Fifth, paving to accommodate new structures will be done. Finally, architectural coatings will be applied to the proposed residential units.

Overall, construction of Alternative 6 is assumed to occur over a 41-month period beginning in January 2015 with completion in November 2018. It is assumed that these pieces of equipment would run for a maximum of eight hours per day five days per week.

As shown in Table IV-1, emissions of VOC during the application of finishing coatings would exceed daily significance thresholds recommended by the SCAQMD. This is based on an assumption of 44 days of application of coatings and use of products with the following average VOC content: residential interior (50 g/L), residential exterior (100 g/L).

#### Localized Emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>

To determine whether or not construction activities associated with Alternative 6 could create significant adverse localized air quality impacts on nearby sensitive receptors located offsite, the emissions contribution from Alternative 6 are also analyzed according to SCAQMD's localized significance threshold (LST) methodology. Under this methodology, projects that are greater than five acres in size should perform air quality dispersion modeling to determine whether construction activities would cause or contribute to adverse localized air quality impacts. The criteria pollutants that are required to be analyzed include NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>.

It should be noted that the SCAQMD considers a sensitive receptor to be a receptor where it is possible that an individual could remain for 24 hours. Thus, according to the SCAQMD, the LSTs for PM<sub>10</sub> and PM<sub>2.5</sub>, which are based on a 24-hour averaging period, would be appropriate to evaluate the localized air quality impacts of a project on nearby sensitive receptors. Additionally, since a sensitive receptor is considered to be present onsite for 24 hours, LSTs based on shorter averaging times, such as the one-hour NO<sub>2</sub> or the 1-hour and 8-hour CO ambient air quality standards, would also apply when evaluating localized air quality impacts on sensitive receptors. However, LSTs based on shorter averaging periods, such as the NO<sub>2</sub> and CO LSTs, are applied to receptors such as industrial or commercial facilities since it is reasonable to assume that workers at these sites could be present for periods of one to eight hours.<sup>16</sup> Therefore, this analysis evaluates localized air quality impacts from construction activities associated with Alternative 6 on sensitive receptors for NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>, and on "non-sensitive" receptors (*e.g.*, industrial or commercial facilities) for NO<sub>2</sub> and CO.

The daily construction emissions generated by Alternative 6 are also analyzed to determine whether or not they would result in significant adverse localized air quality impacts on nearby sensitive receptors

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<sup>16</sup> *Ibid.*

located off-site, including the neighboring convalescent home. As shown in Table IV-1, localized emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> would not exceed LST thresholds established by the SCAQMD.

**Table IV-7**  
**Estimated Mass Daily Construction Emissions - Unmitigated**

Emissions Source	Emissions in Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Demolition</b>						
On-Site Emissions	5	59	36	<1	3	3
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	5	59	37	<1	3	3
<b>Grading</b>						
On-Site Emissions	6	66	44	<1	21	13
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	6	66	45	<1	21	13
<b>Building Construction</b>						
On-Site Emissions	5	41	29	<1	3	3
Off-Site Emissions	5	24	67	<1	9	3
Total Emissions	10	65	96	<1	12	6
<b>Paving</b>						
On-Site Emissions	5	49	37	<1	2	2
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	6	49	38	<1	2	2
<b>Architectural Coatings</b>						
On-Site Emissions	85	2	2	<1	<1	<1
Off-Site Emissions	<1	<1	7	<1	<1	<1
Total Emissions	85	2	9	<1	<1	<1
<b>Regional Significance Threshold</b>						
	75	100	550	150	150	55
<b>Exceed Threshold?</b>						
	Yes	No	No	No	No	No
<b>Localized Significance Threshold</b>						
	--	151	2,599	--	53	14
<b>Exceed Threshold?</b>						
<i>Source: DKA Planning, 2014. Calculation sheets are provided in Appendix G to this RP-DEIR.</i>						

### Operational Emissions

Operational emissions associated with Alternative 6 are estimated using the CalEEMod 2013.2.2 computer model and the information provided in the traffic study prepared for Alternative 6. Operational emissions would be comprised of mobile source emissions and area source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with operation of Alternative 6. Area source emissions are generated by natural gas consumption for space and water heating, and landscape maintenance equipment. To determine if an air quality impact would occur, the net increase in operational emissions generated by the Alternative in 2019 (Alternative 6 buildout year) would be compared with the SCAQMD's recommended thresholds.

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Site after occupation. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices and cooking appliances, the operation of landscape maintenance equipment, the use of consumer products, and the application of architectural coatings (paints). Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions has been prepared utilizing the CalEEMod 2013.2.2 computer model recommended by the SCAQMD. The results of these calculations for existing operations are presented in Table IV-2.

Emissions from the operation of the Alternative are presented in Table IV-3. As shown, Alternative 6 would generate net increases in average daily emissions that do not exceed the thresholds of significance recommended by the SCAQMD. This represents a less than significant impact and less than the Proposed Project's average daily emissions.

**Table IV-8  
Existing Estimated Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summertime (Smog Season) Emissions</b>						
<b>Existing Land Uses</b>						
Area Sources	0.00	0.00	0.00	0.00	0.00	0.00
Energy Sources	0.00	0.00	0.00	0.00	0.00	0.00
Mobile Sources	3.05	8.30	33.43	0.10	6.40	1.80
<b>Total Emissions</b>	<b>3.05</b>	<b>8.30</b>	<b>33.43</b>	<b>0.10</b>	<b>6.40</b>	<b>1.80</b>
<i>Source: CAJA Environmental Services, LLC. Calculation sheets are provided in Attachment C to this RP-DEIR.</i>						

#### Localized Hotspot CO Concentrations

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed CO “hotspots.” The SCAQMD considers CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots.

Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

Long-term operations of Alternative 6 would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only



occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Alternative 6 development area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, Alternative 6 would not contribute to the levels of congestion that would be needed to produce the amount of emissions necessary to trigger a potential CO hotspot. Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.<sup>17</sup> Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. Traffic levels of service at the ten intersections studied in the vicinity of the project would not be significantly impacted by mitigated traffic volumes from the development under existing or future horizon scenarios.<sup>18</sup> In addition, Alternative 6 would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow.

As shown, future CO concentrations near these intersections would not exceed the national and State ambient air quality standards for CO. Therefore, implementation of Alternative 6 and cumulative development would not expose any possible sensitive receptors (such as residential uses, schools, hospitals) located in close proximity to these intersections to substantial localized pollutant concentrations. This would be a less than significant impact regarding the exposure of sensitive receptors to substantial pollutant concentrations and less than the Proposed Project when compared.

**Table IV-9**  
**Estimated Daily Operational Emissions – Proposed Project – 2019**

Emissions Source	Emissions in Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summertime (Smog Season) Emissions</b>						
Area Sources	47.98	0.22	18.57	0.00	0.10	0.10
Energy Sources	0.21	1.79	0.76	0.00	0.14	0.14
Mobile Sources	7.10	21.12	83.90	0.25	16.73	4.70
Total Emissions	55.28	23.12	103.23	0.26	16.98	4.95
Existing Emissions	(3.05)	(8.30)	(33.43)	(0.10)	(6.40)	(1.80)
Net Emissions	52.23	14.82	69.80	0.16	10.58	3.15
SCAQMD Threshold	55.00	55.00	550.00	150.00	150.00	55.00
<b>Significant?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<i>Note: Subtotals may not appear to add correctly due to rounding in the CalEEMod model.</i> <i>Source: DKA Planning, 2014. Calculation sheets are provided in Appendix G, attached to this RP-DEIR.</i>						

<sup>17</sup> Caltrans, *Transportation Project-Level Carbon Monoxide Protocol*, updated October 13, 2010.

<sup>18</sup> Linscott, Law & Greenspan, "Traffic Impact Study for the Verdugo Hills Residential Project, City of Los Angeles," July 9, 2008.

### Airborne Odors

The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source, the wind speeds and direction, and the sensitivity of the receiving location each contribute to the intensity of the impact. While offensive odors rarely cause any physical harm, they can be unpleasant and cause distress among the public and generate citizen complaints.

Specifically, the following PDF related to airborne odors has been identified for Alternative 6:

**PDF-14** Architectural coatings used on the finish of the construction process shall use products that average 50 g/L VOC content for interior applications and 75 g/L VOC content for exterior applications based on a weighted average of product used. Coatings shall be applied over at least a three-month period to mitigate daily VOC emissions.

Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Alternative 6 would include residential use, and would not contain any of the above-listed odor producing uses. Instead potential operational airborne odors could result from cooking activities associated with the new residential units. These odors would be minimal, if noticeable at all; would be similar to existing residential uses in the local vicinity; and would be confined to the immediate vicinity of the new buildings. Therefore, implementation of the Alternative 6 is not expected to create objectionable odors affecting a substantial number of people. This is a less than significant impact and no new mitigation measures are proposed other than those identified for the Proposed Project in the Original DEIR.

### *Level of Significance With Proposed Project Mitigation*

Alternative 6 impacts on air quality resulting from operations and construction are expected to be less than significant, as illustrated in Table IV-4 below. Proposed mitigation measures identified for the Proposed Project in the Original DEIR are intended to further reduce impacts. With that and when compared to the Proposed Project, impacts associated with Alternative 6 would be lower than the Proposed Project estimated emissions.

**Table IV-10**  
**Estimated Mass Daily Construction Emissions - Mitigated**

Emissions Source	Emissions in Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Demolition</b>						
On-Site Emissions	5	59	36	<1	3	3
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	5	59	37	<1	3	3
<b>Grading</b>						
On-Site Emissions	6	66	44	<1	21	13
Off-Site Emissions	<1	<1	1	<1	<1	<1

Emissions Source	Emissions in Pounds per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Total Emissions	6	66	45	<1	21	13
<b>Building Construction</b>						
On-Site Emissions	5	41	29	<1	3	3
Off-Site Emissions	5	24	67	<1	9	3
Total Emissions	10	65	96	<1	12	6
<b>Paving</b>						
On-Site Emissions	5	49	37	<1	2	2
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	6	49	38	<1	2	2
<b>Architectural Coatings</b>						
On-Site Emissions	53	2	2	<1	<1	<1
Off-Site Emissions	<1	<1	7	<1	<1	<1
Total Emissions	53	2	9	<1	<1	<1
Maximum Regional	53	66	96	<1	21	13
<b>Regional Significance Threshold</b>	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
	53	66	44	<1	21	13
<b>Regional Significance Threshold</b>	--	151	2,599	--	53	14
Exceed Threshold?	No	No	No	No	No	No
Source: DKA Planning, 2014. Calculation sheets are provided in Appendix G to this RP-DEIR.						

### Biological Resources

Alternative 6 would result in fewer impacts to protected and mature trees and adjoining micro habitats from around the mature trees (from a reduced fuel modification area). In particular, the large grove of mature oak trees near the existing golf course entrance (and near the monument site area) would be saved and preserved. The impacts from Alternative 6 are discussed below and compared to the impacts of the Proposed Project.

### Special Status Species

Impact to special status species from Alternative 6 would be similar to, but less than, the Proposed Project. Due to the reduction in impacts to native habitats from construction as well as fuel modification activities, as detailed above, the potential extent of impacts to special status species would be similarly reduced in extent and severity. Although reduced, the same potential impacts from the Proposed Project to special status plants (Greata's aster, Catalina mariposa lily, golden-rayed pentachaeta, chaparral rein orchid, Fish's milkwort, ocellated Humboldt lily, Plummer's mariposa lily, slender mariposa lily, Coulter's Matilija poppy and white rabbit-tobacco) and reptiles (silvery legless lizard, orange-throated whiptail, coastal western whiptail, rosy boa, coast horned lizard, and coast patch-nosed snake) from fuel modification activities, and to special status birds (Cooper's hawk, southern California rufous-crowned

sparrow, Bell's sage sparrow, oak titmouse, Costa's hummingbird, loggerhead shrike, black-chinned sparrow, chipping sparrow, and other nesting birds), bats (western mastiff bat and western red bat) and small mammals (San Diego woodrat) from construction and fuel modification activities have the potential to occur under Alternative 6. However, the implementation of Mitigation Measures D.1-1 through D.1-4, prescribed under the Proposed Project, would reduce these potential impacts to special status species to less than significant.

Impacts to the behavior and long-term survival of sensitive species from Alternative 6 would also be similar to, but less than, the Proposed Project. Although these impacts would be less under Alternative 6 than the Proposed Project, these impacts may be considered potentially significant. However, these impacts can be reduced to a less than significant level through the implementation of Mitigation Measure D.1-5, as prescribed under the Proposed Project.

#### *Protected and Mature Trees*

Of the 321 protected trees on-site (303 coast live oaks and 18 western sycamores), Alternative 6 would remove 29 coast live oaks and 10 western sycamores, compared to the Proposed Project which would remove 85 coast live oaks and 11 western sycamores.

Impacts to these protected and mature trees from Alternative 6 would be less than the impacts from the Proposed Project, however, they would still be considered potentially significant. Similar to the Proposed Project, these impacts would still be considered significant with mitigation in the short-term due to the temporary loss of protected trees until they can grow to the size necessary to adequately replace the removed trees. In the long run, the impacts to protected and mature trees would be reduced to less than significant due to the implementation of Mitigation Measures D.2-16 through D.2-20, prescribed under the Proposed Project. The amount of mitigation required for the protected trees would be less under Alternative 6 than for the Proposed Project, as the area of protected tree canopy removed would be less; and this would require a revision of the conceptual planting plan.

**Table IV-11**  
**Protected and Mature Tree Removals from Alternative 6 Compared to the Proposed Project**

	<b>Total Removed by Proposed Project</b>	<b>Total Removed by Alternative 6</b>	<b>Difference ( ) = fewer removed</b>
<b>Protected Native Tree Species</b>			
Coast live oak	85	29	(56)
California sycamore	11	10	(1)
<b>TOTAL Protected Native Trees</b>	<b>96</b>	<b>39</b>	<b>(57)</b>
<i>Source: CAJA Environmental Services, LLC 2014 (Verdugo Hills Golf Course Tree Report, September 2008)</i>			

In addition to the trees that would be removed, other trees adjacent to the development (especially those associated with the widening of La Tuna Canyon Road) may be impacted by construction activities encroach upon the dripline of the trees. However, with the implementation of Mitigation Measure D.2-1 to D.2-15, prescribed under the Proposed Project, this impact would be reduced to less than significant.

#### *Sensitive Wildlife Movement and Migration Corridors*

The limitation of development within the western portion of the site under Alternative 6 would retain a portion of the overall site that would allow for wildlife movement along the edges of the site and between the preserved habitats on-site (mature oak grove and current clubhouse). The mature oak grove's current asphalt paving would be removed to allow the return of the natural habitat at the base of this group of trees. Therefore, similar to the Proposed Project but to a lesser degree, Alternative 6 would result in a less than significant impact to wildlife movement or migration corridors.

#### *Wetlands*

No wetlands are present on the Project Site. However, there are potentially jurisdictional drainage features present on the Project Site. Although impacts to these drainages from Alternative 6 would be less than the impacts from the Proposed Project, they would still be considered potentially significant; however, implementation of Mitigation Measure D.1-6, prescribed under the Proposed Project, would reduce these potential impacts to potentially jurisdictional "waters of the U.S." and streambeds to less than significant, similar to the Proposed Project.

#### *Cultural Resources*

Because Alternative 6 would disturb a smaller area of the Project Site than the Proposed Project, it has the potential to reduce impacts to archaeological and paleontological resources. Because these potential cultural resources have been removed from the Project Site (due to previous golf course development), neither the Proposed Project nor Alternative 6 would impact any potential archaeological or paleontological resources.

With regards to historic resources, because of the significance of events associated with the Tuna Canyon Detention Station (a temporary internment camp for detainees following the attack on Pearl Harbor in December 1941) formerly located on a portion of the Project Site, the SWCA Evaluator (in 2005) recommended commemoration of portions of the Project Site through designation as a California Historical Landmark (CHL) in the Original DEIR. Such an additional designation was not intended to preserve the present resources at Verdugo Hills Golf Course, but to commemorate associated events through interpretation at the Project Site, to encourage sensitive development of the overall landscape, and to accommodate visitors to the Project Site through ease of parking, observation, and meditation.

Pursuant to City Council Motion 54A, as discussed in further detail in Section III.E, a portion of the property with coast live Oaks and Sycamores was declared a Historic-Cultural Monument per Los

Angeles Administrative Code Chapter 9, Division 22, Article 1, Section 22.171.7 *et seq.* Alternative 6 is affected by the City's Historic-Cultural Designation in that houses, internal roadways, approximately 100' of sidewalk, curb, and gutter along La Tuna Canyon Road, and common area landscaping and improvements are proposed to be located within the designated portion of the Property. In addition, approximately twenty-two (22) existing trees (identified by numbers 75-83 and 251-263 on the May 2009 Tree Report, Appendix F-2 of the Original DEIR) are located within the designated area.

Pursuant to the Los Angeles Administrative Code and City permitting requirements, any permit that requires demolition, substantial alteration, or relocation of a Historic-Cultural Monument shall be referred to the Cultural Heritage Commission for review and approval before a permit is issued. In addition, Sections 12.21.A.12 and 17.05.R of the Los Angeles Municipal Code include "protected tree" regulations for removal, relocation, and replacement of such trees. As such, work associated with permits needed for alteration, removal, or relocation of the designated Coast Live Oaks and Sycamores and existing physical improvements within the HCM designated area would, therefore, require referral to the Cultural Heritage Commission. Alternative 6, as proposed, would have a significant impact on the historical resource mentioned above due to the configuration of homes and improvements proposed within the designated Historic-Cultural Monument area. Thus, mitigation would be necessary to reduce this impact to a less than significant level, similar to the Proposed Project.

Because of the significance of events associated with the property, commemoration of the site through designation as a California Historical Landmark (CHL) in the thematic landmark group "Temporary Detention Camps for Japanese Americans," was initially recommended as Mitigation Measure E.1-1 in the Original DEIR. However, formal commemoration of the historic use has now been accomplished through the City of Los Angeles's Historic-Cultural Monument designation. The commemoration and preservation of the Historic-Cultural Monument, coupled with implementation of the September 10, 2013 Working Group recommended site plan, are included as Mitigation Measures E.1-1 through E.1-3. Those Mitigation Measures, when implemented, would reduce impacts to a less than significant level, similar to the Proposed Project.

While cultural resource impacts under the Proposed Project would be less than significant, because of its smaller development area, they would be further reduced by Alternative 6.

### ***Geology and Soils***

Alternative 6 and the Proposed Project would be subjected to the same potential geotechnical conditions on the Project Site (e.g., seismicity, slope instability and soil erosion). However, Alternative 6 would involve slightly less landform alteration so as to not disturb certain protected areas on the Project Site: Alternative 6 would grade approximately 27.1 acres of the Project Site, while the Proposed Project would grade 28.6 acres (approximately 1.5 acres more than Alternative 6). Alternative 6 would require less earthwork than the Proposed Project: it would involve approximately 448,000 cubic yards of excavation and embankment. Of this, there would be approximately 110,000 cubic yards of raw cut and 338,000 cubic yards of over-excavation and recompaction, balanced on site. In comparison, the Proposed Project

would require approximately 508,000 cubic yards of fill with approximately 64,000 cubic yards of import. Geologic impacts from landform alterations under the Proposed Project and, similarly, under Alternative 6 would be less than significant. Additionally, Alternative 6 would have slightly less impact with respect to geologic and soils conditions as compared to the Proposed Project.

The Project Site does not lie within an Alquist-Priolo Special Studies Zone and no known active or potentially active faults cross the Project Site. Therefore, neither the Proposed Project nor Alternative 6 would expose people or structures to adverse effects involving rupture of a known earthquake fault.

The Project Site is susceptible to strong ground shaking during a seismic event. However, the homes under either the Proposed Project or Alternative 6 must be designed in accordance with the Unified Building Code, which would reduce seismic risks for either project to an acceptable level.

The Project Site is not within an area considered subject to liquefaction or seismic settlement. Therefore, neither the Proposed Project nor Alternative 6 would expose people or structures to potential substantial adverse effects involving liquefaction or other seismic-related ground failure.

The graded and natural areas of the Project Site will be subject to erosion and sedimentation during, and following grading of the Development Areas. Compliance with the Grading Code and Federal Clean Water Act regulations will reduce soil erosion and loss of topsoil for both the Proposed Project and Alternative 6 to less than significant levels.

The Project Site does not show evidence of ancient or recent bedrock landslides, recent surficial slope failures or slumps. Also, gross stability analysis indicates that the bedrock slopes are stable. Therefore, construction of either the Proposed Project or Alternative would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts for both projects would be less than significant.

Since the primarily granular character of the surficial materials on the Project Site is not conducive to the development of mud and debris flows, neither the Proposed Project nor Alternative 6 would be subject to significant impacts from mud and debris flows.

No potential land subsidence-related circumstances and or activities are suspected to occur on the Project Site, nor have they in the past. Therefore, neither the Proposed Project nor Alternative 6 would be subject to subsidence hazards.

Expansive earth materials are not known to be present within the Project Site. Therefore, neither the Proposed Project nor Alternative 6 would be subject to significant impacts expansive earth materials.

### ***Hazards and Hazardous Materials***

The Proposed Project is not located on a site which is included on a list of hazardous materials sites. More specifically, there are no detectable amounts of petroleum hydrocarbons or organochloride

pesticides on the Project Site. While there are detectable concentrations of petroleum hydrocarbons in one location, soil remediation in that area would reduce hazardous from detectable concentrations of petroleum hydrocarbons to a less than significant level. In addition, there are no known properties within a one-mile radius of the Project Site with known or documented releases of potentially hazardous materials. Therefore, neither the Proposed Project nor Alternative 6 would be adversely affected by hazardous materials left over from previous site uses or from offsite properties.

Both the Proposed Project and Alternative 6 are residential developments. Therefore, neither project would use, store, or transport significant amounts of hazardous materials; be likely to result in reasonably foreseeable conditions involving the release of hazardous materials into the environment; or emit hazardous emissions or handle hazardous materials within one-quarter mile of an existing or proposed school. Therefore, neither the Proposed Project nor Alternative 6 would have a significant impact with respect to adverse hazards and/or hazardous materials.

### ***Hydrology and Water Quality***

Both the Proposed Project and Alternative 6 would develop the site with residential uses; consequently, the two projects would be expected to discharge runoff of approximately the same quality. Both projects would be required to comply with the NPDES BMP requirements to ensure that the construction activities would not cause soils erosion and/or the discharge of polluted water from the Project Site. Similarly, both projects would also be required to comply with the SUSWP BMP requirements to ensure that the long-term operational activities would not result in the discharge of urban pollutants into the storm drainage system. This analysis assumes Alternative 6 would utilize the project's system of underground tanks to allow infiltration into the native soils in order to satisfy the stormwater treatment requirements of the City's General Stormwater Discharge Permit issued by the Regional Water Quality Control Board. Therefore, Alternative 6 would have approximately the same less than significant water quality impacts as the Proposed Project.

Since it is the Proposed Project's goal that post-development runoff will not exceed that generated by the Project Site in its existing condition, the Proposed Project will capture and store the excess runoff within each subarea in underground tanks. It is expected that Alternative 6 would use the same underground storage tank system to ensure that post-development runoff will not exceed that generated by the Project Site in its existing condition. Therefore, off-site hydrology impacts are expected to be comparable.

### ***Land Use***

Impacts associated with physically dividing an established community would be the same as under the Proposed Project. Although the homes surrounding the Proposed Project site are generally single family homes rather than multi-family homes, the area is residential. The Project Site is currently occupied by a golf course and undeveloped open space. Although the Proposed Project will be more densely developed than the residential areas to the north, residential areas to the east of the site are more densely developed



with condominiums. There are currently no community services or public services<sup>19</sup> on the Project Site, and there are no existing roadways through the Project Site that are used by the adjacent residential communities to the north and east. Therefore, the proposed residential uses would not introduce a new use to the area and would not divide the residential communities to the north and east. Therefore, Alternative 6 would not physically divide any established communities, similar to the Proposed Project.

#### *Land Use Compatibility*

From a functional perspective, the development proposed under Alternative 6 would be compatible with existing homes east of Tujunga Canyon Boulevard and would match the General Plan and Community Plan land use designation. The Alternative's homes would be clustered in the southeastern portion of the site adjacent to the more densely developed residential areas on the east side of Tujunga Canyon Boulevard. Proposed undeveloped land would serve as a buffer between the Project Site and the less densely developed residential areas on the hillsides on the north. Although the density of the Alternative's homes would be greater than the adjacent residential uses, Alternative 6 would be functionally compatible with the existing homes to the east and buffered from the homes to the north (which are upslope and a significant distance away from the Alternative).

Although this alternative proposes residential uses which would be less compatible with the slightly lower density single family homes to the north than the Proposed Project, the amount of open space would be greater, serving as a more substantial buffer. Additionally, there is a small condominium complex immediately to the east of the site and one slightly farther east fronting on Honolulu Avenue. The proposed maintenance of the permanent open space is compatible with the existing open space in the project vicinity and is compatible with existing residential uses. Therefore, the homes under Alternative 6 together with the preservation of open space would be functionally compatible with surrounding land uses.

#### *Consistency with Land Use Plans, Policies and Regulations*

In general, the discussion for impacts related to the consistency with regional plans would be the same for Alternative 6 as for the Proposed Project. Thus, this section focuses on the local applicable plans of the City of Los Angeles.

#### City of Los Angeles General Plan Framework Element

As identified in the setting section for the Proposed Project (section IV.I.), the Citywide General Plan Framework Element guides the City's long range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and community plans and it sets forth a conceptual relationship between land use and transportation issues on a citywide basis. Although the

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<sup>19</sup> Community and public services include schools, libraries, recreational facilities, neighborhood retail uses and other community-serving land uses.

goals, objectives and policies of the General Plan Framework Element are intended for larger scale planning projects, such as policies and community plans, the two that were identified as applicable to the Proposed Project, and discussed in Table IV.I-1 of the Original DEIR, are applicable to Alternative 6 and addressed below:

**GOAL 3B:** *Preservation of the City's stable single family neighborhoods.*

**Objective 3.5:** *Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.*

**Discussion:** *Somewhat Consistent.* Alternative 6 does not involve the demolition of any existing residential units. It does include the development of 221 homes. The buildings would be clustered on the southeastern portion of the site. The Alternative allows for the maintenance of an undeveloped land buffer between very low density existing residential uses to the north and northwest of the Project Site. Thus, this Alternative is consistent with this goal and objective of the General Plan.

**GOAL 4A:** *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

**Objective 4.3:** *Conserve scale and character of residential neighborhoods.*

**Discussion:** *Consistent.* One of the objectives of the Proposed Project is to provide a substantial amount of housing for local and area residents to meet existing and future needs of those desiring to live in the northeast San Fernando Valley and to help alleviate the substantial housing shortage in the City.

There are a range of land use densities and developments surrounding the Project Site. Residential neighborhoods to the north are low density, however a multiple-acre open space buffer will ensure there is no encroachment on that neighborhood. Residential land uses to the east of the Project Site are of similar density as the alternative. Thus the scale and character of the neighborhoods would be preserved and Alternative 6 is consistent with this goal and objective.

Alternative 6 would be similar in compatibility as the Proposed Project to the General Plan Framework.

*Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan (Community Plan)*

The Community Plan encourages the preservation and protection of single family areas and existing undeveloped land from encroachment by incompatible uses. In addition, according to ZIMAS, parcels 2572-021-020 and 2572-028-030 are subject to the City's Slope Density Ordinance (No. 162,144). The Slope Density Ordinance permits a maximum density of one unit per acre for areas with an average

natural slope between 0% and 15%. For average natural slopes greater than 15%, the allowable density is reduced incrementally to a minimum of 0.05 units per acre. However, as discussed in Section IV.J, Land Use, of the Original DEIR, Footnotes No. 4 and 20 to the Community Plan override the City's Slope Density Ordinance for areas within those parcels with an Average Natural Slope below 15% and permits a density of no greater than allowed for RD-5 zoning (5,000 square feet per unit) for those areas.

Also, according to ZIMAS, parcel 2572-021-017 and a small triangle (400 square feet) of parcel 2572-021-020 are subject to the City's Baseline Hillside Ordinance ("BHO"). The BHO imposes various restrictions on hillside parcels including setback requirements, maximum residential floor areas and grading. However, the affected areas are not being proposed for development making the restrictions of the BHO moot. Based upon the above, the theoretical maximum density potential for the Proposed Project is 274 dwelling units, which, of course, is significantly higher than the 221 units proposed under Alternative 6.

As this alternative represents a lower density development on the site than under the Proposed Project, there is more consistency with the goals, objectives and policies of the Community Plan with respect to residential density. Specifically, under this Alternative, lot sizes would range from 2,768 to 10,530 square feet in area. The proposed homes would range in size from 1,800 to 2,700 square feet in building area and have a maximum height of 30 feet (two-stories). Each home would have a two-car garage. When compared to the Proposed Project, lot sizes would range from 2,560 to 10,720 square feet in area. The Proposed Project homes would range in size from 1,800 to 2,700 square feet in building area and will have a similar maximum height of 30 feet (two-stories). Table IV-6 below is provided to help illustrate and compare the Proposed Project with Alternative 6 as it relates to density and lot size. As shown below, Alternative 6 would better satisfy the cluster opportunity where more undeveloped land is preserved, and at the same time providing greater housing choices in comparison to the Proposed Project.

**Table IV-12**  
**Development Density Comparison**

<b>Development Scenario</b>	<b>Number of Units</b>	<b>Minimum Lot Size</b>	<b>Maximum Lot Size</b>	<b>Units Mix</b>
Proposed Project	229	2,560 sq. ft.	10,720 sq. ft.	92 5-BR 137 4 BR
Alternative 6	221	2,768 sq. ft.	10,530 sq. ft.	83 4-BR 138 3-BR
<i>Note: BR – Bedrooms; sq. ft. – square feet.</i>				

Alternative 6 is generally consistent or partially consistent with the applicable policies in the Community Plan and it is more consistent than the Proposed Project with regard to policies designed to promote open space areas, and that encourage greater housing choices. Additionally, the density proposed by Alternative 6 is less than the Proposed Project and is consistent with the density designated by the Community Plan. Thus, this alternative is more consistent with the Community Plan policy regarding single detached units and residential density than the Proposed Project.

#### *Small Lot Subdivision Ordinance*

The City has enacted the Small Lot Ordinance (No. 176354) to allow the construction of fee-simple, infill housing on small lots in multi-family and commercial zones. The Ordinance provides a more space-efficient and economically attractive alternative for sites zoned for apartment or condominium uses. To help implement the design quality expected for small lot subdivisions, the Ordinance provides design guidelines to help further its strategies. Overall, to help ensure compatible developments that improve the context of the built environment, the Small Lot Design Guidelines promote the following goals:

- Create high-quality indoor and outdoor living environments for all residents.
- Enhance the public realm.
- Provide fee-simple home ownership opportunities for a greater number of people, at a wider range of income levels.
- Provide solutions for infill housing.
- Design and configure housing to be compatible with the existing neighborhood context, especially in sensitive areas. This includes areas contained within Specific Plans, Community Design Overlays (CDOs), and Historic Preservation Overlay Zones (HPOZs).
- Prioritize the livability and market value of a project over strict density.

Alternative 6 would create a high-quality outdoor living environment compatible with the existing residential area. Additionally, Alternative 6 would enhance the public realm compared to what exists currently, and provide new home ownership opportunities in an area of mostly commercial and residential land uses. Overall, the design and implementation of Alternative 6 would create a development that would ultimately improve the context of the built environment.

#### *Conclusion*

Overall, Alternative 6 would implement policies designed to protect undeveloped land by clustering development, and providing greater housing choices in comparison to the Proposed Project, which is consistent with the goals and policies of the General Plan and Community Plan. Thus, land use impacts

associated with Alternative 6 would be less than significant, and in some cases, less than the impacts associated with the Proposed Project.

## *Noise*

### *Construction*

Construction activities of Alternative 6 would be similar to the Proposed Project. Because this alternative would involve the use of the same types of construction equipment as the Proposed Project, construction of this alternative would cause a temporary increase in ambient noise levels in the project vicinity above existing levels. This would result in a significant, albeit temporary, noise impact. Specifically, Alternative 6 proposes to subdivide and subsequently develop 221 homes on the 53.8-acre Project Site. The proposed 221 homes will be built in two locations. Most of the homes will be built in the southeast corner of the Project Site on the portion of the site currently occupied by the Verdugo Hills Golf Course. Some homes will be built farther to the north, between the Verdugo Wash right-of-way on the west and Tujunga Canyon Road on the east. The construction noise impacts would be reduced to less than significant with compliance with LAMC Noise Ordinance No. 41.40, which restricts demolition and noise activities to the hours of 7:00 AM to 9:00 PM. Nevertheless, as Alternative 6 would concentrate construction activities in the southeastern portion of the Project Site, it would reduce impacts to the single-family homes to the north and east.

Construction activities that would occur under Alternative 6 have the potential to generate low levels of groundborne vibration at the adjacent sensitive receptors. With implementation of the Mitigation Measures in Section IV.L (Noise Section) of the Original DEIR, impacts would be similar to the Proposed Project's less than significant impacts.

### *Operation*

When operational, Alternative 6 would increase the amount of human activity at the Project Site compared to existing conditions. The noise levels from the onsite activities would not be expected to exceed City thresholds for outdoor or interior living spaces. Therefore, operational noise levels under Alternative 6 would result in temporary or periodic increases in noise levels that are similar to those associated with the Proposed Project.

Off-site locations in the project vicinity would experience a slight increase in noise resulting from the additional traffic generated by the Alternative. The increases in noise levels at noise-sensitive locations along the study-area roadway segments in the vicinity of the Project Site were projected for the year 2012 but can be considered a conservative forecast of future noise impacts in 2019. Ambient traffic volumes on the 25 roadway segments analyzed are anticipated to be higher in 2019 than in 2012. This would increase the ambient noise levels along the study roadways, making any increase in future noise levels from Alternative 6 traffic even more negligible than the lower ambient noise levels assumed for 2012.

Alternative 6 would generate slightly less daily vehicular trips when compared to the Proposed Project due to the reduced amount of residential units. In general, in order to achieve a noticeable increase in ambient noise levels due to traffic, a doubling of traffic on any given roadway would need to occur. Therefore, because Alternative 6 would generate slightly less offsite vehicle trips, traffic noise would be similar to the Proposed Project and impacts would be less than significant.

### ***Population/Housing***

Development under this alternative would, similar to the Proposed Project, only involve the implementation of residential uses on the site. The Project Site is currently a golf course and does not contain any homes or people, thus, this alternative would not result in the displacement of any existing homes or people.

Under Alternative 6, 221 single family homes would be developed on the Project Site, which equals 5 less dwelling units than under the Proposed Project. Also, similar to the Proposed Project, increases in population and housing resulting from this alternative are not expected to directly induce substantial population growth because the projected population associated with this alternative would be consistent with area-wide population and housing forecasts. Specifically, Alternative 6 represents approximately eight percent of the forecasted population growth and approximately eight and one-half percent of the forecasted housing growth in the Community Plan area (see Table IV.M-3 in Section IV.M of the Original DEIR).

### ***Housing Element***

As indicated in Table IV-7 below, Alternative 6 would be fully consistent with the Housing Element as it would further most of the Housing Element's policies, while the Proposed Project would not be fully consistent with certain policies. As such, since Alternative 6 would be consistent with the Housing Element, it would result in a less than significant impact with respect to plan consistency.

**Table IV-13**  
**Alternative 6 Consistency with the Applicable Policies of the Housing Element**

<b>Policies</b>	<b>Consistency Discussion</b>
<b>Policy 1.1.2:</b> Promote affordable rental housing for all income groups that need assistance.	<b>Consistent.</b> Alternative 6 mix of residential uses would be available to meet many income levels in the community. Alternative 6 proposes market rate housing for the influx of workers such as nurses, administrative assistants, and office workers in this particular area of the City. Therefore, development of this Alternative would further this policy.
<b>Policy 1.1.3</b> Facilitate new construction of a variety of housing types that address current and projected needs of the city's households.	<b>Consistent.</b> Alternative 6 would include the development of a total of 221 single-family residential units that contain two- and three-bedroom residential units. This mix of residential

**Table IV-13**  
**Alternative 6 Consistency with the Applicable Policies of the Housing Element**

Policies	Consistency Discussion
	use would be available to address the current and projected needs of the City's households and influx of workforce jobs in the region. Therefore, development of Alternative 6 would be consistent with this policy.
<b>Policy 1.1.4:</b> Expand location options for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.	<b>Not Consistent.</b> Alternative 6 would include the development of single-family residential uses, expanding location options for residential development. However, the location is not in a designated Center, Transit Oriented District or along a Mixed-Use Boulevard. Considering the lack of public transit opportunities in the area, Alternative 6 would not be consistent with this policy.
<b>Policy 2.1.2:</b> Establish development standards that enhance health outcomes.	<b>Consistent.</b> Alternative 6 air quality impacts would be less than significant during construction and operation. Also, Alternative 6 would result in a less than significant land use compatibility impact by constructing a building with design elements focused to reduce potential health exposures, such as Air Quality. Thus, this potential impact would be less than significant and less than that of the Proposed Project.
<b>Policy 2.2.3:</b> Provide incentives and flexibility to generate new housing and to preserve existing housing near transit.	<b>Consistent.</b> Alternative 6 proposes a Small Lot Subdivision, an Ordinance intended to generate new, fee simple home ownership opportunities in underutilized multi-family and commercial areas. Alternative 6 does not include the removal of existing housing; therefore, development of Alternative 6 would be consistent with this policy.
<b>Policy 2.3.2:</b> Promote and facilitate reduction of water consumption in new and existing housing.	<b>Consistent.</b> This Alternative would result in a less than significant impact associated with water consumption. The Alternative proposes development in full compliance with the City's Green Building Ordinance, including low flush toilets. Therefore, development of Alternative 6 would be consistent with this policy, similar to the Proposed Project.
<b>Policy 2.3.3:</b> Promote and facilitate reduction of energy consumption in new and existing housing.	<b>Consistent.</b> Alternative 6 proposes a building constructed and operated with strict compliance to the City's green standards for energy consumption. Therefore, development of Alternative 6 would be consistent with this policy.
<b>Policy 2.3.4:</b> Promote and facilitate reduction of waste in construction and building operations.	<b>Consistent.</b> Alternative 6 would result in a less than significant impact associated with waste, as Alternative 6 would recycle a minimum of 50-percent of its construction waste. Therefore, development of this Alternative would be consistent with this policy.

**Table IV-13**  
**Alternative 6 Consistency with the Applicable Policies of the Housing Element**

<b>Policies</b>	<b>Consistency Discussion</b>
<b>Policy 2.4.1:</b> Provide sufficient services and amenities to support the planned population while preserving the neighborhood for those who currently live there.	<b>Consistent.</b> Alternative 6 would include the development of residential uses with recreational amenities and outdoor gathering spaces. Alternative 6 would provide sufficient services and amenities to support the planned population. Therefore, development of Alternative 6 would be consistent with this policy.
<b>Policy 2.4.3:</b> Promote preservation of neighborhood character in balance with facilitating new development.	<b>Consistent.</b> Alternative 6 would include the development of a residential project in an area currently in transition from commercial zoned land to residential land uses. Therefore, development of Alternative 6 would be consistent with this policy, and less than those impacts identified for the Proposed Project.
<b>Policy 2.4.4:</b> Promote residential development that meets the needs of current residents as well as new residents.	<b>Consistent.</b> Alternative 6 would include the development of a total of 221 single-family residential units that contain two- and three-bedroom residential units. There are no current residents, and this mix of residential uses would be available to meet the needs of new residents, including the existing workforce in the area surrounding the Project Site. Therefore, development of Alternative 6 would be consistent with this policy.
<b>Policy 3.1.1:</b> Promote and facilitate equal opportunity practices in the sale and rental of housing.	<b>Consistent.</b> Alternative 6 mix of residential use would be available to meet a range of income levels in the community and would allow for equal opportunity. Therefore, development of Alternative 6 would be consistent with this policy.
<i>Source: City of Los Angeles, Department of City Planning, Housing Element 2006 -2014, adopted August 13, 2008; and CAJA, December 2014.</i>	

Overall, Alternative 6 would be consistent with a majority of the applicable Policies of the Housing Element and potential impacts would be less than significant, and slightly less than those identified for the Proposed Project for the reasons discussed above.

Therefore, similar to the Proposed Project, population and housing increases under Alternative 6 would be within the projected growth for the area and impacts would be similar to those of the Proposed Project, which is less than significant.

### ***Recreation***

Under the Proposed Project, the payment of Quimby Fees to fund new nearby facilities would not mitigate the loss of the Verdugo Hills Golf Course for the community. Specifically, the addition of



homes and increased residents in an area that is already below the LADRP standard for parkland acres, would further the impact on existing facilities. For these reasons, the impact of the Proposed Project on parks and recreational facilities was considered significant.

Conversely, Alternative 6 would directly contribute to meeting the recreational needs of its new residents through the provision of on-site facilities and amenities, as well as amenities for the larger public impacted by the closure of the Verdugo Hills Golf Course facility. Specifically, the following PDF's relating to parks and recreation have been identified for Alternative 6:

- PDF-15: Land Dedication:** The Applicant will dedicate 28.4 acres of undeveloped land within the Project Site to the City for public use, including PDF-2 and PDF 3 below. Dedicated land shall comply with the principles and standards set forth in the Recreational Element of the General Plan, and the location of land to be dedicated shall bear a reasonable relationship to the use of the proposed park and recreational facilities by the future inhabitants of the subdivision.
- PDF-16: Trail Creation:** Project trails that connect existing and proposed trail segments to lookouts and scenic vistas shall follow the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan for further guidance in design and development.
- PDF-17: Dog Park Creation:** Area(s) for the recreation and treatment of pet animals (i.e., dog) shall be created and follow the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan for further guidance in design and development.
- PDF-18: Project Amenities:** Project Amenities for private resident use will be located throughout the Alternative 6 site and will include: 1. Private walk streets with amenities along the walk streets which will include children's play areas with jungle gyms and sand boxes and exercise stretching stations. 2. The site will include a clubhouse with meeting and conference rooms and a fitness center. 3. A swimming pool with separate children's quarters. 4. A community roof garden (on top of the clubhouse). All proposals for the construction of amenities would undergo submittals to the City of Los Angeles Department of Building and Safety as well as the City of Los Angeles Planning Department for compliance. The private ownership and maintenance of the facilities shall be adequately provided for by written agreements, the use of the public facilities will be restricted for park and recreational purposes by recorded covenants, which run with the land, and the proposed private facilities will be in substantial accordance with the PRP portion of the Service Systems Element of the General Plan.

Currently, citywide park space is provided at an estimated rate of 0.76 acre per 1,000 residents, while the Community Plan has a ratio of 0.86 acres per 1,000 people.<sup>20</sup> Therefore, the City meets neither the PRP's

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<sup>20</sup> *Op. cit.*

desired short-, intermediate-, nor long-range standards. The Project Site is located within a relatively suburban area of the City that has a higher parkland ratio than the City average, but is still below the PRP standard for neighborhood and community park acreage.

Alternative 6 would directly contribute to meeting the recreational needs of its new residents through the provision of on-site park and recreational facilities and amenities, as well as park and open space for the larger public to reduce the impact from the loss of the golf course. As described above under Project Design Features, approximately 82 percent of Alternative 6 post-development acreage (or 47.11 acres) would consist of a combination of landscaped common areas, undeveloped land recreational amenities, and walk streets (total project acreage equals 57.45 acres). These totals are more than that proposed for the Proposed Project.

Alternative 6 would include four categories of land use: “general” undeveloped land, trails, and walk streets, landscaped common areas, and recreational amenities. “Undeveloped land” is defined as open areas that do not contain driveways, streets, or buildings and associated facilities, and in this case would include hillside slopes with slope gradients greater than 15 percent. Trails and walk streets consist of areas designated for outdoor recreation. Landscaped common areas include street parkways and other common areas not specifically designated for recreation, but which would be landscaped. Recreational amenities consist primarily of community center pool, fitness center, Dog Park, walk streets, and children’s play area. Table IV-8 provides a detailed breakdown of the amount of each type of proposed use provided by Alternative 6.

**Table IV-14**  
**Alternative 6 Recreational and Undeveloped Land Summary**

Land Category	Total Area		Accessibility		
	Acres	Square Feet	Public	Private	Length
Undeveloped Land	26.48	1,153,468	X		
Land Suitable for Active Recreation	1.92	83,635	X		
Trails on Undeveloped Land	-	-	X		3,570 ft.
<b>Subtotal</b>	<b>28.4</b>				
Project Trails and Walk Streets	-			X	4,570 ft.
Landscaped Zones	3.9	169,884		X	
Communal Areas and Walkable Paths-Project Recreational Amenities	1.69	73,616		X	
Project Gardens and Private Yards	11.6	505,296		x	
<b>Totals:</b>	<b>45.59</b>	<b>1,985,900</b>			

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*Source: CAJA Environmental Services, LLC; JTD Architects, 2015.*

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As shown in Table IV-9 below, the inclusion of the proposed parks and recreational amenities in this alternative would dedicate 43.25 acres of the site to active recreational usage by future Alternative 6 residents. Of this total, 65.6% would be accessible to the general public, including the proposed 28.4 acre potential Public Park and proposed pedestrian/jogging trail on the hillside above the residential portion of the Project Site. The remaining 18.71 acres would be accessible only to the residents of Alternative 6. Taking into consideration all seven categories of proposed recreational space within the Project Site, approximately 47.11 acres of the site would be dedicated to a combination of recreational use. Of this total, 28.4 acres would be accessible to the general public and 18.71 acres would be accessible only to the residents of the Project.

As a privately owned golf course, the Project Site does not currently contain public parkland, as calculated by the PRP, but rather private open space, per the City's General Plan Framework Chapter 6 Open Space and Conservation Element definition of "open space." Per the Open Space Element definition, "open space" encompasses both publicly and privately-owned properties that are unimproved and used for the preservation of natural resources, managed production of resources, outdoor recreation, and protection of life and property due to natural hazards.

Alternative 6 proposes the removal of the existing golf course, including the loss of 57.45 acres of privately held land, a portion of which constitutes private open space. Alternative 6, however, proposes the donation of 28.4 acres of publicly accessible undeveloped land. As a result, Alternative 6's 28.4 acre dedication would improve the ratio of neighborhood and community parks to population in the Community Plan Area by 28.4.1 acres. Should the City or another public entity accept this donation, the net result would be an increase in the parkland ratio to 0.767 acres from existing 0.760 acres for the City and 1.31 acres from 0.864 acres for the Community Plan Area.

The existing golf course does provide a recreational opportunity for the community, but access to the resource is constrained by the fees and equipment required to play golf on a private course. Although Alternative 6 includes the removal of the private golf course, it mitigates this loss with the proposed inclusion of 28.4 acres of publicly accessible recreational space, which the Proposed Project does not include in its design. No fee will be required for public access, and the proposed dedication of land will be able to accommodate a wider range of recreational activities. Also, as shown in Table IV-9 below, there are at least six other golf courses within a short driving distance to the Project Site.

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**Table IV-15**

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**Golf Courses and Facilities Near the Project Site**

Facility	Location	Driving Distance from Project Site	Course Type	Other
Oakmont Country Club	3100 Country Club Drive	3.3 mi.	18 Holes (Private)	Driving Range
Angeles National Golf Club	9401 Foothill Blvd, Sunland	5.1 mi	18 Holes (Public)	Driving Range
La Canada Flintridge CC	5500 Godbey Drive	6.9 mi.	18 Holes (Private)	Driving Range
Hansen Dam Golf Course	10400 Glenoaks Blvd.	8.6 mi.	18 Holes (Public)	Lighted Driving Range
Scholl Canyon Golf & Tennis Club	3800 E. Glenoaks Blvd., Glendale	11.0 mi.	18 Holes (Public)	Lighted Driving Range & Tennis Courts
DeBell Golf Club	1500 E. Walnut, Burbank	11.5 mi.	18 Holes (Public)	Driving Range
<i>Source: CAJA Environmental Services, LLC; JTD Architects, 2015.</i>				

*Quimby Act and City of Los Angeles Municipal Code (LAMC)*

As a residential development, Alternative 6 would be subject to both the State's Quimby Act and the required payment of City Dwelling Unit Construction Tax (DUCT). Based on the preferred parkland per population ratio of four acres per 1,000 persons, the 552.5 new residents<sup>21</sup> of Alternative 6 would generate a demand for an additional 2.25 acres of new parkland. Alternative 6 proposes 3.25 acres of private open space and recreational amenities for the new residents.

As noted above, the Quimby Act allows for the payment of the fees in lieu of parkland dedication for larger residential projects such as Alternative 6. Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through parkland dedication and/or the payment of in-lieu fees. For instance, Alternative 6 would be required to do one of the following: dedicate approximately 2.26 acres (98,445 Sq. Ft.) of park and recreation space, or pay in-lieu fees of \$5,804 per dwelling unit.<sup>22</sup>

As noted in PDF 1 through 4 above, Alternative 6 would fulfill the Quimby requirements through the provision of both public and private parkland and recreational amenities. Thus, Alternative 6 would meet the requirements set forth in Section 12.21 of the LAMC, and could be found to meet the parkland dedication requirements of Section 17.12 of the LAMC, thereby reducing parkland demand in the Community Plan area, and impacts would be less than significant.

<sup>21</sup> *Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan, Average Household Sizes (Owner Households) = 2.5 persons per unit x 221 units = 552.5 persons*

<sup>22</sup> *Based on the revised fees in accordance with Section 12.12H of the LAMC, effective March 1<sup>st</sup>, 2009, and the fee requirement for per acre density permitted in the R4 zone.*

Thus, with implementation of the proposed Project Design Features and/or Compliance Measures, Alternative 6 impacts to recreational uses would be reduced to less than significant levels and well below the Proposed Project's conclusion of significant and unavoidable.

### ***Traffic***

A Traffic Impact Study has been prepared by Linscott, Law & Greenspan, Engineers (LLG) to summarize the Alternative 6 traffic analysis on March 17, 2015. This Traffic Impact Study is also included as Appendix E, to this RP-DEIR. LLG also prepared the traffic impact study for the Proposed Project. LLG's traffic study for the Proposed Project concluded that the impacts would be less than significant at the study intersections evaluated therein, including implementation of the recommended traffic mitigation measures at one of the study intersections.

Ten intersections were identified and analyzed in order to determine changes in operations following construction and occupancy of Alternative 6. Application of the impact threshold criteria from the City of Los Angeles and City of Glendale indicates that none of the ten study intersections would be significantly impacted by the forecast Alternative traffic. Incremental but not significant impacts are noted at the study intersections evaluated in the traffic analysis. As no significant impacts are expected due to the Alternative, no traffic mitigation measures are required for the study intersections. However, as was stated in the 2008 traffic study for the Original Project, the installation of a traffic signal is recommended at the intersection of Tujunga Canyon Boulevard and Pali Avenue. In addition to the installation of a traffic signal, it is recommended that the Alternative provide a northbound and southbound left-turn pockets on Tujunga Canyon Boulevard at Pali Avenue.

As described in the Traffic Impact Study, a supplemental analysis that assumed two separate existing conditions was also prepared. This analysis was included for the purpose of providing the public with information about potential future traffic impacts in the event the golf course and/or driving range are closed before the approval of the Project. However, the environmental baseline for the Project would continue to be the existing physical environment at the time of the Notice of Preparation, pursuant to the City's CEQA Guidelines. The first scenario assumed existing-use credit would be applied for the 28-tee driving range only and the second scenario assumed no existing-use credit would be applied for the Project Site. Under both scenarios, once the City of Los Angeles' significant impact criteria was applied, it was determined that this Alternative would create significant impacts at Intersection No. 4 (Tujunga Canyon Boulevard/Pali Avenue) during the weekday PM peak hour and Intersection No. 5 (Tujunga Canyon Boulevard/La Tuna Canyon Road-Honolulu Avenue) during the weekday AM peak hour. Installation of the aforementioned traffic signal at Intersection No. 4 would reduce the impact of Alternative 6 under both scenarios to less than significant levels. Similarly, by re-striping the eastbound approach of La Tuna Canyon Road at Intersection No. 5 to a left-turn lane, shared right-/left-turn lane, and a right-turn lane, the impact of the Alternative under both scenarios would be reduced to less than significant levels.

An additional review was prepared for the driveways located on La Tuna Canyon Road and Tujunga Canyon Boulevard. Based on the Alternative 6 Site Plan and Trip Generation, it is anticipated that all inbound vehicle will have adequate storage space provided within the Project Site. Vehicles arriving at the Project Site during the AM and PM peak hours can queue entirely within the Site and are not anticipated to impede through traffic along La Tuna Canyon Road and Tujunga Canyon Boulevard.

#### ***Public Services - Fire Protection***

The Proposed Project would introduce approximately 577 new residents to the Project Site. Thus, an increase in the demand for fire protection services is anticipated. Under Alternative 6, the 221 single-family homes would introduce approximately 553 new residents to the Project Site. Thus, based upon the number of residents, Alternative 6 has the potential to decrease the demand for fire protection services.

The provision of adequate fire flows helps to ensure that the development of the Project Site will not overburden fire protection services. As previously discussed, the Water Operations Division of the DWP would perform a fire flow study at the time of permit review in order to ascertain scale of water system or site-specific improvements. Both the Proposed Project and Alternative 6 would be required to provide hydrants, water lines, and protection per Fire Code requirements. Therefore, with respect to fire flows, fire protection for both projects would meet code.

As mentioned in the Original DEIR, the response distance from the first response fire stations does not meet LAMC recommendations, and therefore, is considered inadequate and potentially significant. However, the requirement to provide automatic fire sprinkler systems in order to compensate for the additional response distance is considered adequate mitigation for both the Proposed Project and Alternative 6. Therefore, both the Proposed Project and Alternative 6 would have similar impacts of less than significant.

#### ***Public Services - Police Protection***

Both the Proposed Project and Alternative 6 would be sources of attractive nuisances, providing hazards, and inviting theft and vandalism during construction. Consequently, both could be expected to provide the same precautions to prevent trespassing through the construction site: temporary fencing installed around the construction site and the deployment of roving security guards. When such common sense precautions are taken, the demand for local law enforcement at the construction site would be less than significant for both projects.

While the Proposed Project would introduce approximately 577 new residents to the Project Site, Alternative 6 would introduce approximately 552.5 residents. Thus, Alternative 6 would generate less demand for police protection services than the Proposed Project: the number of requests for assistance calls for police response to retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to be less under Alternative 6.

As previously discussed in the Original DEIR, the LAPD has stated that the Foothill Community Police Station is staffed and equipped to provide full service to the Foothill area, which includes the Project Site, and that the Proposed Project would not result in the need for construction or expansion of police stations or other police protection facilities. As such, no new or expanded police stations would be needed, the construction of which could cause significant environmental impacts, as a result of either the Proposed Project or Alternative 6. Therefore, impacts to police protection services would be less than significant for both the Proposed Project and Alternative 6, although impacts under Alternative would be somewhat less.

### ***Public Services – Schools***

Both the Proposed Project and Alternative 6 would be served by the following LAUSD public schools: (1) Mountain View Elementary School (K-5) located at 6410 Olcott Street, Tujunga; (2) Mount Gleason Middle School (6-8) located at 10965 Mt. Gleason Avenue, Sunland; and (3) Verdugo Hills High School (9-12) located at 10625 Plainview Avenue, Tujunga. Each of these schools currently has excess enrollment capacity. The Proposed Project would generate a total of 94 public school students, including 46 elementary students, 22 middle school students, and 26 high school students. All of public school students generated by the Proposed Project could be served by the local schools without creating a capacity problem. Therefore, under both the Proposed Project and Alternative 6, potential impacts on schools would be less than significant, as this alternative would propose less residential units. Notwithstanding the less than significant impact, both the Proposed Project and Alternative 6 would be required to pay developer fees to the LAUSD, which would provide full and complete mitigation of any potential school impacts.

### ***Public Services – Parks***

As described above under the Recreation subheading, with implementation of the proposed Project Design Features and/or Compliance Measures, Alternative 6 impacts to recreation and park uses would be reduced to less than significant levels.

### ***Public Services – Libraries***

According to the Los Angeles Public Library, the additional residents generated by the Proposed Project would adversely affect its ability to maintain its current levels of service. Based on the City's standard of 0.5 square feet of facility space per resident, the project's 577 new residents would generate a need for approximately 288.5 square feet of library space. These 288.5 square feet of library space are the approximate equivalent of a 17' x 17' room, the construction of which would not be expected to result in any significant environmental impacts. In contrast, the 552.5 new residents of Alternative 6 would generate a demand for approximately 280 square feet, which would be the equivalent of a room approximately 20' x 20' in area. Even though this alternative proposes a slight decrease in new residents when compared to the Proposed Project, the difference in size would be negligible with respect to

potential construction-related impacts. Therefore, under the Proposed Project and Alternative 6, impacts would be less than significant.

### ***Utilities - Wastewater***

The existing Verdugo Hills Golf Course facility generates approximately 772 gallons of wastewater per day. The Proposed Project would eliminate the golf course and driving range, and would replace them with 229 single-family homes. Thus, it is estimated that the Proposed Project would generate a net increase of 74,798 gpd of wastewater. In contrast, Alternative 6 would add 221 single-family homes, but it would remove the driving range and golf course. Overall, Alternative 6 would generate a net increase of 73,148 gpd of wastewater, as shown in Table IV-10 below. The overall decrease in sewage generation is accounted for by the lower amount of residential development proposed. While, the Proposed Project's impact on sewer systems and wastewater treatment requirements would be less than significant, Alternative 6 would further reduce impacts to the sewerage system.

**Table IV-16**  
**Alternative 6 Wastewater Generation**

<b>Land Use</b>	<b>Size</b>	<b>Generation Rate <sup>a</sup></b>	<b>Net Daily Wastewater Generation (gpd)</b>
<i>Single-Family Homes</i>	<i>224du</i>	<i>330 gallons/du</i>	<i>73,920</i>
<i>Golf Course Facilities (removed)</i>	<i>-9,650 sf</i>	<i>80 gallons/1,000 sf</i>	<i>-772</i>
<b>Alternative 6 Net Total</b>			<b>73,148</b>
<i>Notes:</i> <i>du=dwelling unit; sf = square feet</i> <i><sup>a</sup> Source: Brent Lorscheider, Acting Division Manager, City of Los Angeles Department of Public Works, Bureau of Sanitation, January 23, 2008.</i>			

### ***Utilities – Water Supply***

The Proposed Project would generate a net increased water demand of 36,164 gallons per day. This amount includes netting out the existing golf course and driving range. In contrast, because Alternative 6 proposes less residential units, it would decrease daily water demand on the Project Site by approximately 1,980 gallons. Alternative 6 proposed water usages would be lower than the Proposed Project and lower than the existing golf course uses on the Project Site. Thus, Alternative 6 would substantially decrease water consumption, which would constitute a less than significant impact since Alternative 6 is considered consistent with the Community Plan's project density for the Project Site. As previously discussed, the LADWP has stated that water requirements for any project that is consistent with the City's General Plan have been taken into account in the planned growth in water demand and that sufficient supplies are available to accommodate the Proposed Project. Also, LADWP has stated that there are no known water service problems in the area and that the treatment plant could adequately handle the



Proposed Project. Therefore, impacts to water supply under Alternative 6 would be less than the Proposed Project and would be less than significant.

#### ***Utilities – Solid Waste***

As with the Proposed Project, Alternative 6 would generate a short-term, construction-related waste stream to one or both of the two identified landfills serving the project area. Because each of these landfills has sufficient remaining capacity to accommodate the construction waste stream, and because Alternative 6 would be required to divert 50% of its waste stream from landfills, the construction-related impact of Alternative 6 would be less than significant and similar to the Proposed Project.

It is estimated that the Proposed Project would generate approximately 2,801 pounds of solid waste on a daily basis, one half of which would be diverted to recycling and only 1,400 pounds would be directed to a landfill. Because there is adequate short-term capacity at these landfills, the Proposed Project's impact on remaining landfill capacity is considered less than significant. In comparison, Alternative 6 would generate 2,740 pounds of solid waste, of which 1,370 pounds would be recycled with the remaining directed to a landfill. Thus, Alternative 6 would generate less solid waste than the Proposed Project, and the impact would not be considered significant because there is adequate short-term capacity at these landfills.

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## V. LIST OF PREPARERS

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