City of Los Angeles
Department of City Planning • Environmental Analysis Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

MITIGATED NEGATIVE DECLARATION

CHATSWORTH – PORTER RANCH COMMUNITY PLAN

Chatsworth Hotel Project

Case Number: ENV-2016-1357-MND, CPC-2016-1356-VZC-CU-ZV-SPR-DRB-SPP

Project Location: *9755 North Topanga Canyon Boulevard, Los Angeles, CA 91311 (APN: 2727-012-065)*

Council District: *12*

Project Description: *The Project includes removal of a portion of the existing surface parking lot that is located on part of the 1.95-acre Project site and development of the Project site with a 4-story (44 feet and 7 inches in height), 105-guest-room hotel and surface parking lot, which would include 127 vehicle parking spaces. The Project would require the export of approximately 5,500 cubic yards of soil. To allow for development of the Project, the Applicant is requesting the following discretionary approvals: 1. Zone Change pursuant to LAMC Section 12.32F, from [Q]C2-1 Zone to C2-1 Zone; 2. Conditional Use Approval pursuant to LAMC Section 12.24B to permit a Hotel within 500-feet of an R Zone, as permitted by LAMC Section 12.24W.24, and to permit a "public parking area" in the RA-1 Zone as permitted by LAMC Section 12.24W.37; 3. Variance pursuant to LAMC Section 12.27 to permit a building height of 45 feet within 50 to 99 feet of an RS-1 Zone in lieu of a permitted 33-foot building height pursuant to LAMC Section 12.21.1.A.10; 4. Project Permit Compliance pursuant to LAMC Section 11.5.7C to determine whether the Project is in compliance with applicable regulations of the Devonshire/Topanga Corridor Specific Plan and pursuant to Section 16.C of the Specific Plan for Design Review; 5. Site Plan Review pursuant to LAMC Section 16.05, to permit a development project of 50 or more guest rooms; and 6. Removal of 2 Protected Tree, pursuant to LAMC Section 17.05R.*

APPLICANT:	PREPARED BY:	ON BEHALF OF:
Paradigm SSB, LLC *9755 Topanga Canyon Boulevard* *Chatsworth, CA 91311*	*CAJA Environmental Services* *11990 San Vicente Boulevard* *Los Angeles, CA 90049*	*The City of Los Angeles* *Department of City Planning* *Project Planning Division - Valley*

July 2017

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL

LEAD CITY AGENCY	COUNCIL DISTRICT
City of Los Angeles	12
PROJECT TITLE	**CASE NO.**
Chatsworth Hotel Project	ENV-2016-1357-MND, CPC-2016-1356-VZC-CU-ZV-SPR-DRB-SPP

PROJECT LOCATION

9755 North Topanga Canyon Boulevard, Los Angeles, CA 91311 (APN: 2727-012-065)

PROJECT DESCRIPTION

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NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

Paradigm SSB, LLC
9755 Topanga Canyon Boulevard
Chatsworth, CA 91311

FINDING:

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

(CONTINUED ON PAGE 2)

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

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

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM	TITLE	TELEPHONE NUMBER
DAN O'DONNELL	CITY PLANNER	818.374.9907

ADDRESS	SIGNATURE (Official)	DATE
200 N. SPRING STREET, 6th FLOOR LOS ANGELES, CA. 90012	Dan O'Donnell	JULY 26, 2017

AESTHETICS

1-1: Protected Trees

- All protected tree removals shall require approval from the Board of Public Works.
- A Tree Report shall be submitted to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, for review and approval prior to implementation of the Report's recommended measures.
- A minimum of two trees (a minimum of 15-inch box in size if available) shall be planted for each protected tree that is removed. The canopy of the replacement trees, at the time they are planted, shall be in proportion to the canopies of the protected tree(s) removed and shall be to the satisfaction of the Urban Forestry Division.
- The location of the trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required landscape plan, which shall also indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.

1-2: Non-Protected Trees

- Prior to issuance of any permit related to development of the Project, a plot plan shall be prepared for the Project, indicating the location, size, type, and general condition of all existing trees on the Project site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net new trees located within the parkway of the adjacent public-right(s)-of-way may be counted toward replacement tree requirements.
- Removal or planning of any tree in the public right-of-way shall require approval of the Board of Public Works. All trees in the public right-of-way shall be provided in the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

AIR QUALITY

3-1 All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce NO_x, PM_{10}, and $PM_{2.5}$ emissions at the Project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

3-2 Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year NO_x emissions requirements.

3-3 At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided to the Department of Building and Safety.

3-4 Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy-duty construction equipment. More information on this program can be found at: http://www.aqmd.gov/home/programs/business/business-detail?title=off-road- diesel-engines&parent=vehicle-engine-upgrades.

3-5 Construction activities shall comply with SCAQMD Rule 403, including the following measures:

- Apply water to disturbed areas of the site three times a day.
- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes.
- Appoint a construction-relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
- Limit soil disturbance to the amounts analyzed in the Final MND.

- All materials transported off-site shall be securely covered.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Traffic speeds on all unpaved roads shall be reduced to 5 mph or less.

3-6 Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.

BIOLOGICAL RESOURCES

4-1 Nesting Species

To avoid potential significant impacts to nesting birds, including migratory birds and raptors, one of the following shall be implemented by the Project Applicant:

- Project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season, which generally runs from March 1st - August 31st (as early as February 1st for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

  If Project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

  a. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
  b. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31st.
  c. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
  d. The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

NOISE

12-1 The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

12-2 Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.

12-3 All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance.

12-4 All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent noise-sensitive land uses.

12-5 Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.

12-6 Temporary sound barriers shall be installed as specified:

- A temporary sound barrier no less than 10 feet in height shall be erected to block line-of-sight noise travel from the Project site to Kinzie Street Residences and other neighboring residences to the Project's north. This barrier shall be constructed in such a way so as to have a surface weight of four pounds per square foot or greater, and the Project-facing side should be lined with exterior grade acoustical blankets to provide additional sound absorption. This barrier should extend along the northern boundary of the Project site to prevent on-site construction noise from diffracting around its ends.
- A temporary sound barrier no less than 10 feet in height shall be erected to block line-of-sight noise travel from the Project site to Cielo Apartments. This barrier shall be constructed in such a way so as to have a surface weight of four pounds per square foot or greater, and the Project-facing side should be lined with exterior grade acoustical blankets to provide additional sound absorption. This barrier should extend along the southern boundary of the Project site to prevent on-site construction noise from diffracting around its ends.
- A temporary sound barrier no less than 10 feet in height shall be erected to block line-of-sight noise travel from the Project site to Nevada Avenue Residences. This barrier shall be constructed in such a way so as to have a surface weight of four pounds per square foot of greater, and the Project-facing side should be lined with exterior grade acoustical blankets to provide additional sound absorption. This barrier should extend along the western boundary of the Project site to prevent on-site construction noise from diffracting around its ends.
- At all other Project boundaries, temporary noise barriers no less than 7 feet in height shall be erected to prevent Project construction operations from exceeding the LAMC's 75 dBA limit for construction noise within 500 feet of residential zones.

12-7 A haul route for exporting cut materials from the site shall access local freeways via major arterials such as Topanga Canyon Boulevard. The route should avoid traveling on residential streets, especially those passing through the neighborhoods directly to the Project's north, west, and south.

TRANSPORTATION/TRAFFIC

16-1: Topanga Canyon Boulevard / Lassen Street

Prior to issuance of a Certificate of Occupancy, the Project Applicant shall restripe the westbound approach of the Topanga Canyon Boulevard and Lassen Street intersection to convert the existing through lane to a shared left-turn and through lane and shall change the existing traffic signal equipment to accommodate the changed lane configuration.

TRIBAL CULTURAL RESOURCES

17-1: Discovery of Tribal Cultural Resources

- Impacts to tribal cultural resources from the Project shall be mitigated through the salvage and disposition of Tribal resources that result from all ground-disturbing activities. Ground-disturbing activities include, but are not limited to, drilling, excavation, and trenching. The Applicant shall retain one Native American Monitor who shall be present during all ground-disturbing activities. Should a Tribal cultural resource be encountered, the project Permittee shall immediately stop all ground disturbance activities, and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the

geographic area of the proposed project, and (2) a qualified archaeologist who shall assess the find.

- Prior to the issuance of a grading permit, evidence shall be provided to the Department of City Planning that monitor(s) have been obtained; A Native American Monitor shall be secured for each grading unit. In the event that there are simultaneous grading units operating at the same time, there shall be one monitor per grading unit.
- In the event that subsurface archaeological resources, human remains, or other tribal cultural resources are encountered during the course of ground disturbance activities work shall cease in the area of the find until the archaeological or other tribal cultural resources are assessed and subsequent recommendations are determined by a qualified archaeologist. The qualified archaeologist shall specify a radius around where resources were encountered to protect such resources until the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 have been fulfilled. Project activities may continue outside of the designated radius area.
- In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, including the required notification to the County Coroner and the Native American Heritage Commission.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC).

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APPENDICES

I. INTRODUCTION

Introduction

The subject of this Initial Study is removal of the existing surface parking lot that is located on part of the 1.95-acre Project site and development of the Project site with a 4-story (44 feet and 7 inches in height), 105-guest-room hotel and surface parking lot, which would include 132 vehicle parking spaces. The Project would require the export of approximately 5,500 cubic yards of soil. The Project site is located in the Chatsworth-Porter Ranch Community Plan Area of the City of Los Angeles (the "City"). The Project Applicant is Paradigm SSB, LLC. A more detailed description of the Project is contained in Section II (Project Description). The City's Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

Project Information

Project Title:	Chatsworth Hotel Project
Project Location:	9755 Topanga Canyon Boulevard, Los Angeles, CA 91311 (APN: 2727-012-065)
Lead Agency:	City of Los Angeles Department of City Planning Valley Project Planning 6262 Van Nuys Boulevard, Room 430 Van Nuys, CA 91401
City Contact Person:	Jennifer Driver Valley Project Planning 818-374-9916

Organization of Initial Study

This Draft Initial Study is organized into five sections as follows:

Introduction: This section provides introductory information such as the Project title, the Project Applicant, and the Lead Agency for the Project.

Project Description: This section provides a detailed description of the environmental setting and the Project, including Project characteristics and environmental setting.

Initial Study Checklist: This section contains the completed Initial Study Checklist.

Environmental Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Preparers of Initial Study and Persons Consulted: This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the Initial Study.

II. PROJECT DESCRIPTION

ENVIRONMENTAL SETTING

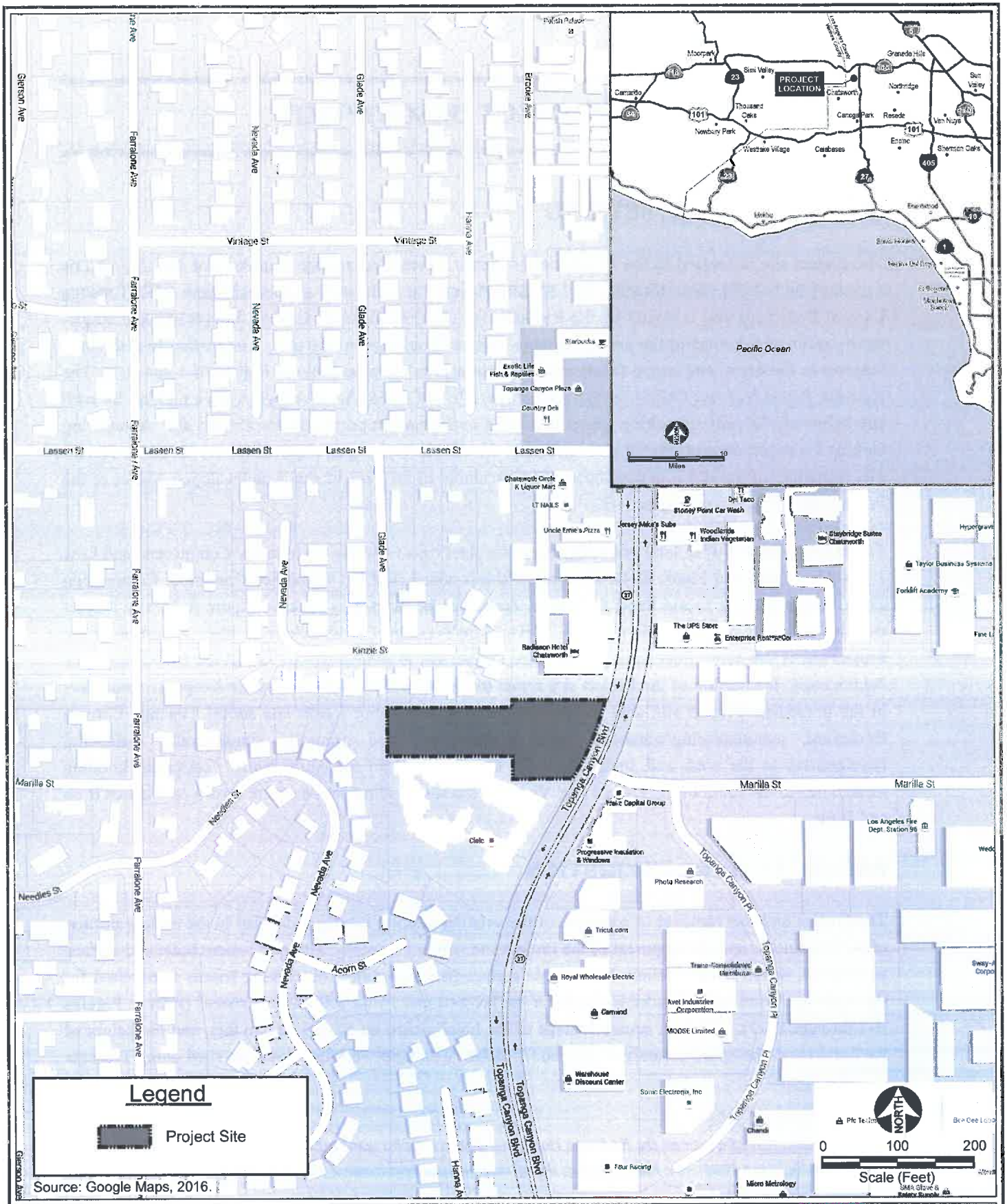
The Project site is located in the Chatsworth – Porter Ranch Community Plan Area of the City of Los Angeles (the "City"). Specifically, the 1.95-acre Project site is located at approximately 9755 Topanga Canyon Boulevard and is bound by the Radisson Hotel (9777 Topanga Canyon Boulevard) and single-family residential homes to the north, Topanga Canyon Boulevard to the east, a multi-family residential building to the south, and single-family residential homes to the west (refer to Figures II-1 and II-2). The Assessor Parcel Number (APN) for the Project site 2727-012-065. An L-shaped surface parking lot with approximately 72 vehicle parking spaces is located in the eastern portion of the Project site. An existing parking Covenant requires the 72 parking spaces for off-site parking as required for the Radisson Hotel.[1] The remainder of the site is undeveloped. The remainder of the Project site is undeveloped. Views of the Project site are shown on Figure II-3.

The existing General Plan land use designations for the Project site are Community Commercial and Low 1 Residential (refer to Figure II-4). The Project site is zoned [Q]C2-1 (Qualified Condition, Commercial Zone, Height District 1) and RA-1 (Suburban Zone, Height District 1) (refer to Figure II-5). The Project site also falls within the boundaries of the Devonshire/Topanga Corridor Specific Plan. A portion of the Project site is subject to liquefaction. The entire Project site is subject to ZI-1732 (Rock Out-Croppings). Additionally, the portion of the Project site zoned RA is subject to ZI-2438 (Equine Keeping). Land uses in the immediate Project site area include commercial uses along (north and south) Topanga Canyon Boulevard, manufacturing/warehouse uses to the east, and primarily single-family residential development to the west and southwest, with the exception of the multi-family residential building located just to the south of the Project site. Views of the surrounding land uses are shown on Figures II-6a and II-6b.

PROJECT CHARACTERISTICS

The Project includes removal of a portion of the existing parking lot that is located in the eastern portion of the Project site and development of the Project site with a four-story, 105-guest-room hotel and surface parking lot, which would include 127 vehicle surface parking spaces (68 parking spaces as required for the Radisson Hotel and 59 parking spaces for the Project) and 16 bicycle parking spaces (refer to Figures II-7 through II-17). The total square footage of the hotel would be 57,497 square feet, and the height of the hotel would be approximately 44 feet and 7 inches. The hotel building would be sited along Topanga

[1] *The recent loss of a tree on the Radisson Hotel site, due to a storm, enabled the addition of four parking spaces on the Radisson Hotel site, thus reducing the off-site parking requirement from 72 spaces to 68 spaces (subject to a revised Covenant).*



CAJA Environmental Services, LLC

Figure II-1
Regional Location Map

CAJA Environmental Services, LLC

Figure II-2
Aerial Photograph of the Project Site

Photo A: View toward the northwest of the eastern portion of the Project site.

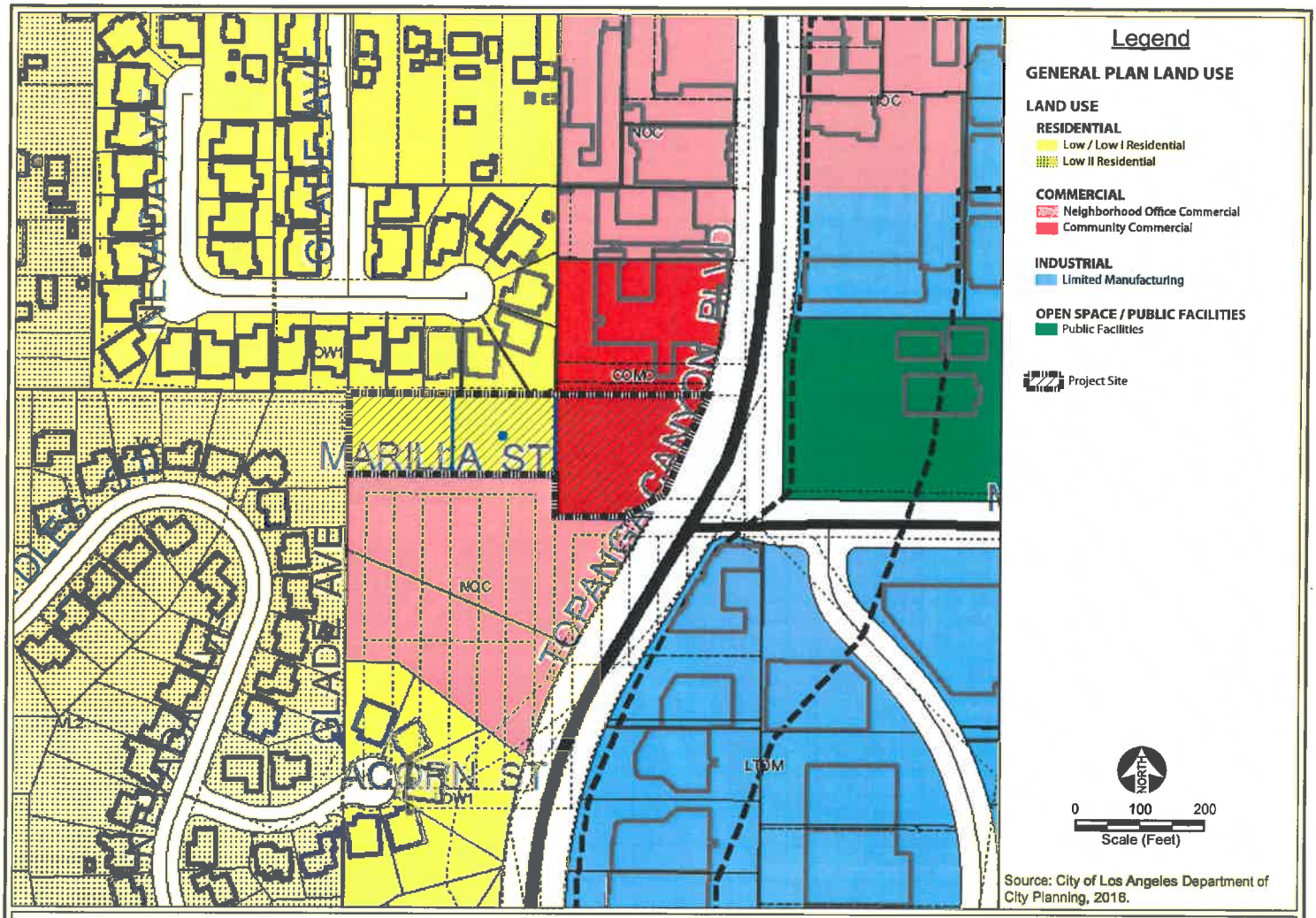
Photo B: View toward the southeast of the eastern portion of the Project site.

Photo C: View toward the west of the western portion of the Project site.

Source: CAJA Environmental Services LLC, 2016.

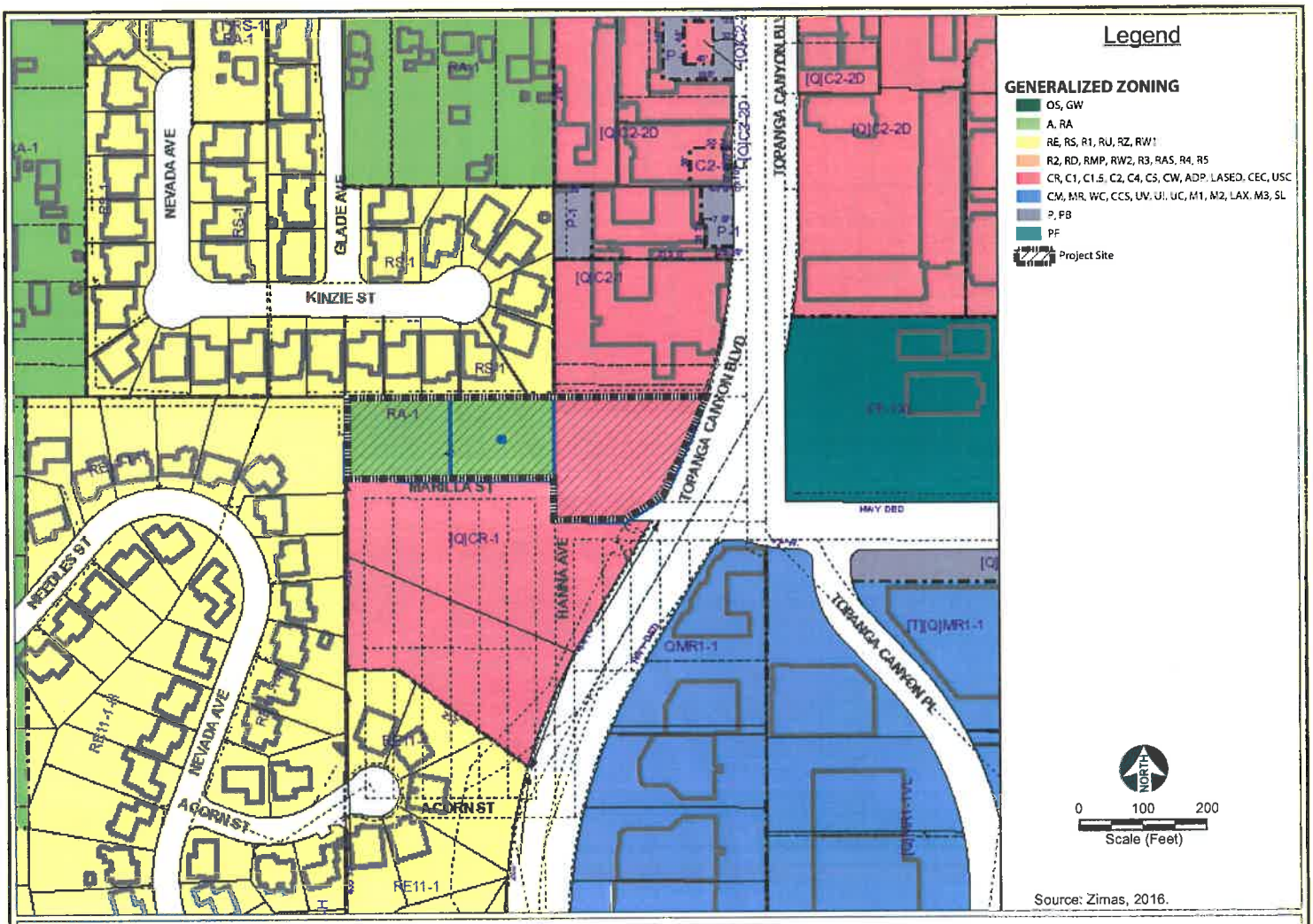
CAJA Environmental Services, LLC

Figure II-3
Views of the Project Site



CAJA Environmental Services, LLC

Figure II-4
Existing Land Use Designation



CAJA Environmental Services, LLC

Figure II-5
Existing Zoning

Photo A: View toward the northwest of the existing Radisson Hotel located just north of the Project site.

Photo B: View toward the west of the existing multi-family residential building located just south of the Project site.

Photo C: View toward the north of the existing land uses located along Topanga Canyon Boulevard, north of the Project site.

Photo D: View toward the southeast of the existing land uses located along Topanga Canyon Boulevard, south of the Project site.

Source: CAJA Environmental Services LLC, 2016.

CAJA Environmental Services, LLC

Figure II-6a
Views of the Surrounding Land Uses

Photo E: View toward the northwest of the single-family residential neighborhood located adjacent to the northwestern portion of the Project site.

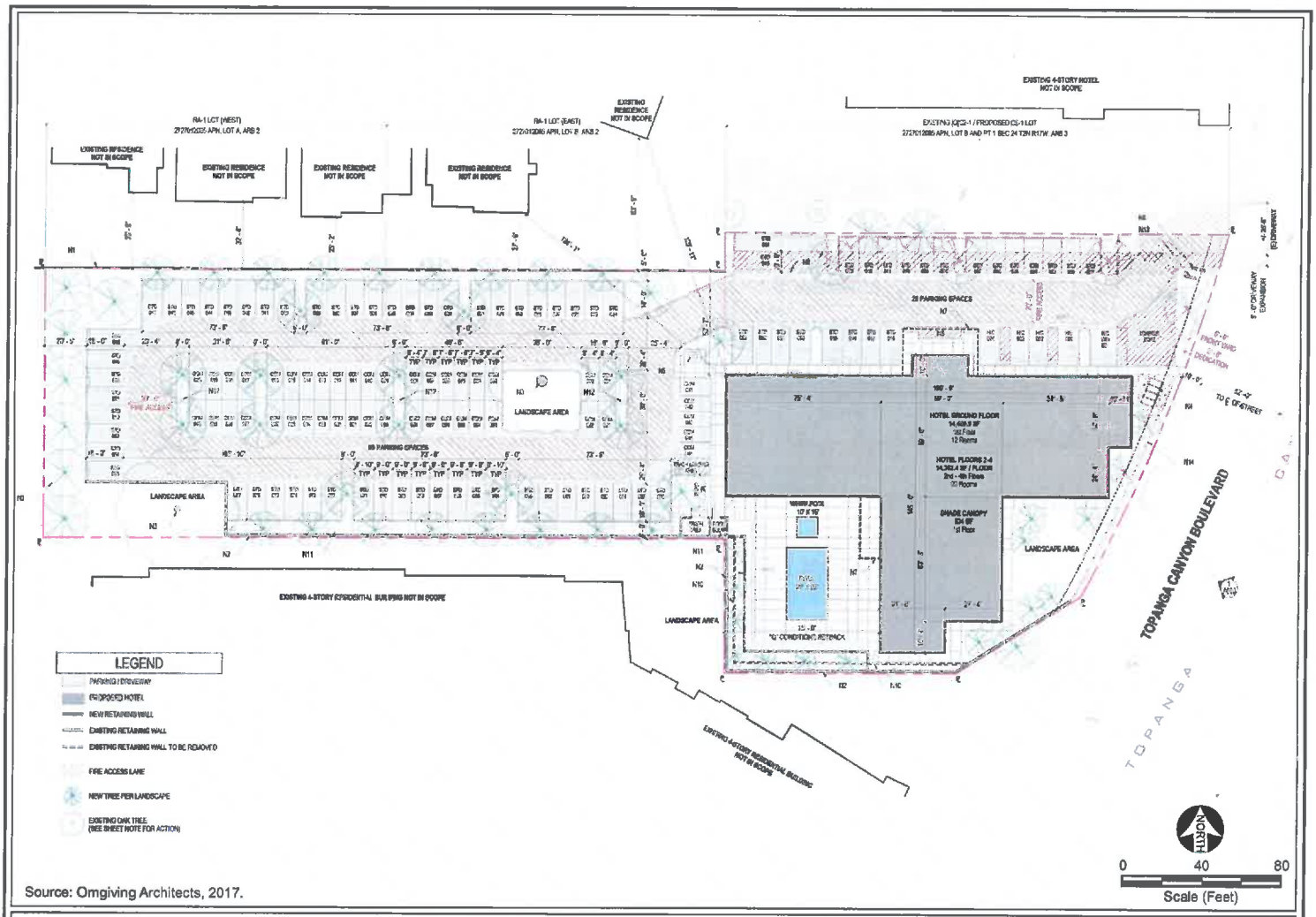
Photo F: View toward the south of the multi-family residential building located adjacent to the western portion of the Project site.

Photo G: View toward the west of the single-family residential neighborhood located adjacent to the western portion of the Project site.

Source: CAJA Environmental Services LLC, 2016.

CAJA Environmental Services, LLC

Figure II-6b
Views of the Surrounding Land Uses



Source: Omgiving Architects, 2017.

CAJA Environmental Services, LLC

Figure II-7
Site Plan

Source: Omgiving Architects, 2017.

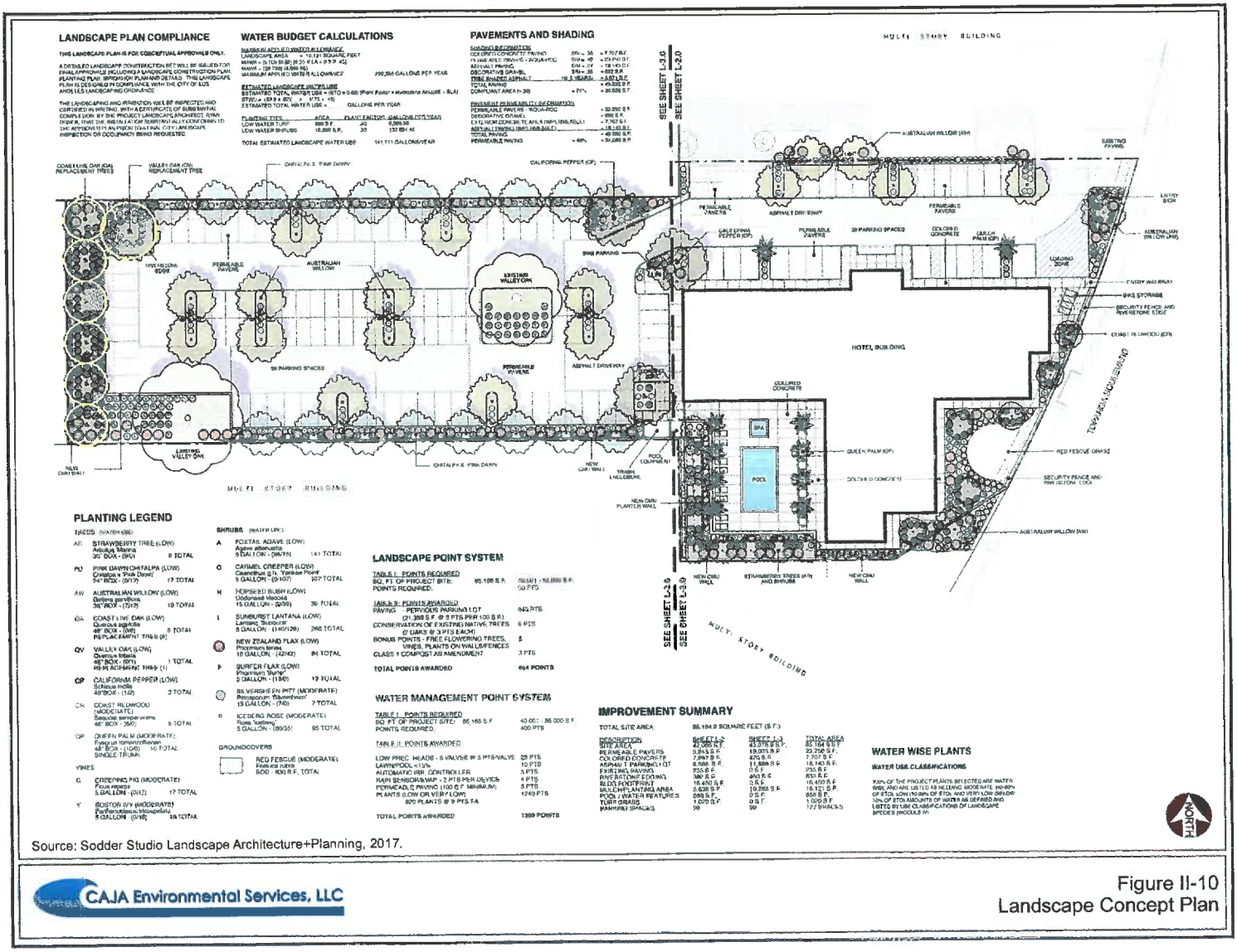
CAJA Environmental Services, LLC

Figure II-8
Ground Floor Plan

Source: Omgiving Architects, 2017.

CAJA Environmental Services, LLC

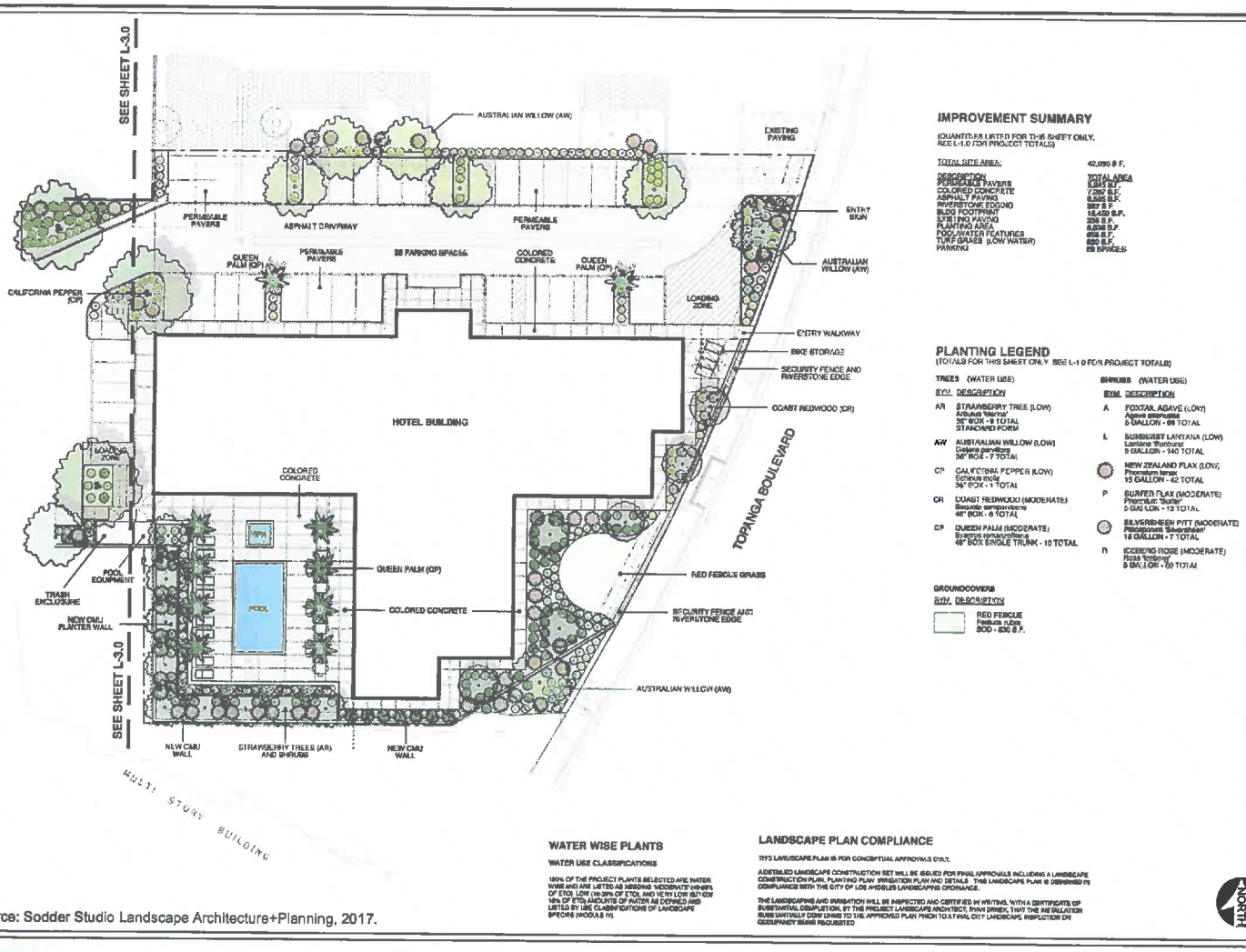
Figure II-9
2nd Floor Plan
(3rd & 4th Floor Sim)



Source: Sodder Studio Landscape Architecture+Planning, 2017.

CAJA Environmental Services, LLC

Figure II-10
Landscape Concept Plan



IMPROVEMENT SUMMARY

(QUANTITIES LISTED FOR THIS SHEET ONLY. REFER L-1.0 FOR PROJECT TOTALS)

TOTAL SITE AREA: 42,000 S.F.

DESCRIPTION	TOTAL AREA
PERMEABLE PAVERS	4,841 S.F.
COLORED CONCRETE	7,267 S.F.
ASPHALT PAVING	6,805 S.F.
RIVERSTONE EDGING	387 S.F.
BLDG FOOTPRINT	16,420 S.F.
EXISTING PAVING	336 S.F.
PLANTING AREA	4,638 S.F.
POOL/WATER FEATURES	456 S.F.
TURF GRASS (LOW WATER)	420 S.F.
PARKING	30 SPACES

PLANTING LEGEND

(TOTALS FOR THIS SHEET ONLY. SEE L-1.0 FOR PROJECT TOTALS)

TREES (WATER USE)

SYM.	DESCRIPTION
AR	STRAWBERRY TREE (LOW) Arbutus 'Marina' 36" BOX - 8 TOTAL STANDARD FORM
AW	AUSTRALIAN WILLOW (LOW) Geijera parviflora 36" BOX - 7 TOTAL
CP	CALIFORNIA PEPPER (LOW) Schinus molle 36" BOX - 1 TOTAL
CR	COAST REDWOOD (MODERATE) Sequoia sempervirens 48" BOX - 6 TOTAL
QP	QUEEN PALM (MODERATE) Syagrus romanzoffiana 48" BOX SINGLE TRUNK - 10 TOTAL

SHRUBS (WATER USE)

SYM.	DESCRIPTION
A	FOXTAIL AGAVE (LOW) Agave attenuata 5 GALLON - 69 TOTAL
L	SUNBURST LANTANA (LOW) Lantana 'Radsunny' 5 GALLON - 140 TOTAL
	NEW ZEALAND FLAX (LOW) Phormium tenax 15 GALLON - 42 TOTAL
P	SURFER FLAX (MODERATE) Phormium 'Surfer' 5 GALLON - 13 TOTAL
	SILVERSHEEN PITT (MODERATE) Pittosporum 'Silvershein' 15 GALLON - 7 TOTAL
R	ICEBERG ROSE (MODERATE) Rosa 'Iceberg' 5 GALLON - 69 TOTAL

GROUNDCOVERS

SYM.	DESCRIPTION
	RED FESCUE Festuca rubra SOD - 830 S.F.

WATER WISE PLANTS

WATER USE CLASSIFICATIONS

100% OF THE PROJECT PLANTS SELECTED ARE WATER WISE AND ARE LISTED AS HAVING 'MODERATE' (40-60% OF ETO), LOW (10-30% OF ETO), AND VERY LOW (LESS THAN 10% OF ETO) AMOUNTS OF WATER AS DEFINED AND LISTED BY USE CLASSIFICATIONS OF LANDSCAPE SPECIES (WUCOLS IV).

LANDSCAPE PLAN COMPLIANCE

THIS LANDSCAPE PLAN IS FOR CONCEPTUAL APPROVALS ONLY.

A DETAILED LANDSCAPE CONSTRUCTION SET WILL BE ISSUED FOR FINAL APPROVALS INCLUDING A LANDSCAPE CONSTRUCTION PLAN, PLANTING PLAN, IRRIGATION PLAN AND DETAILS. THIS LANDSCAPE PLAN IS DESIGNED IN COMPLIANCE WITH THE CITY OF LOS ANGELES LANDSCAPING ORDINANCE.

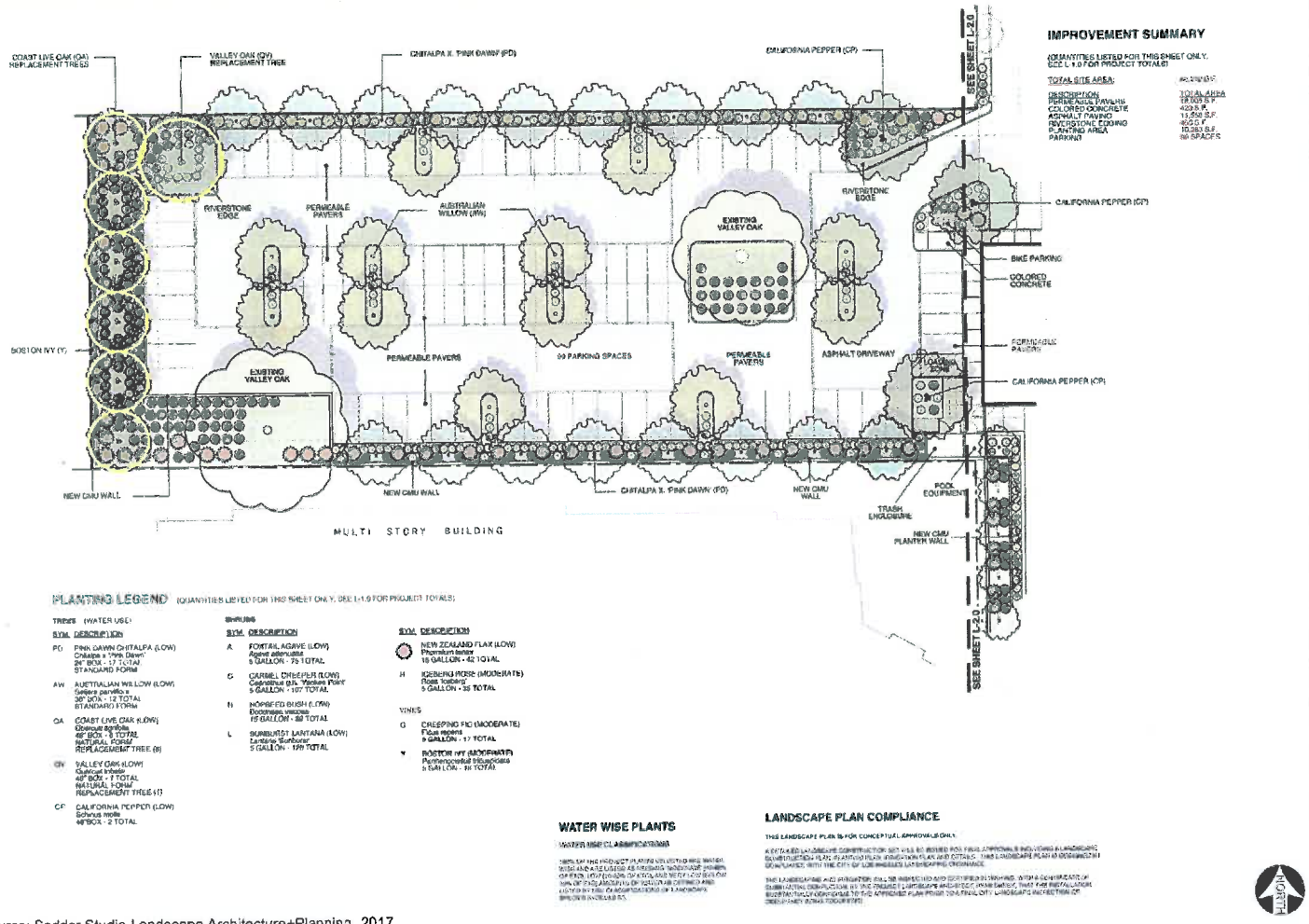
THE LANDSCAPING AND IRRIGATION WILL BE INSPECTED AND CERTIFIED IN WRITING, WITH A CERTIFICATE OF SUBSTANTIAL COMPLETION, BY THE PROJECT LANDSCAPE ARCHITECT, PRIOR (WHEN), THAT THE INSTALLATION SUBSTANTIALLY CONFORMED TO THE APPROVED PLAN PRIOR TO A FINAL CITY LANDSCAPE INSPECTION OR OCCUPANCY BEING REQUESTED.

NORTH

Source: Sodder Studio Landscape Architecture+Planning, 2017.

CAJA Environmental Services, LLC

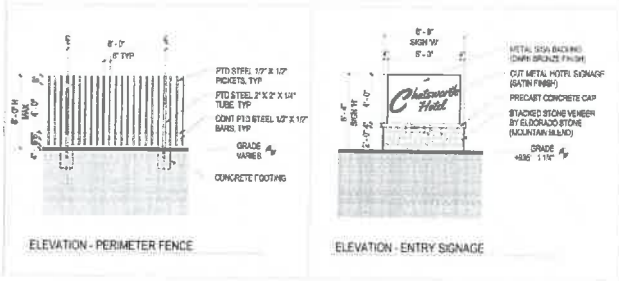
Figure II-11
Enlarged Hotel Plan



Source: Sodder Studio Landscape Architecture+Planning, 2017.

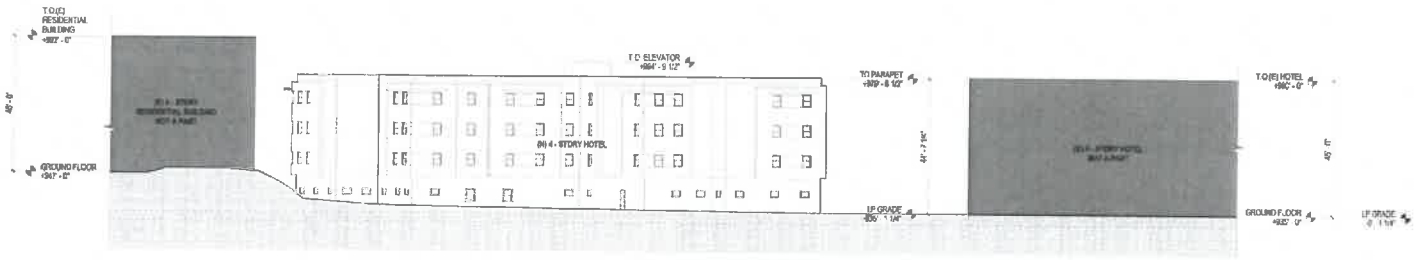
CAJA Environmental Services, LLC

Figure II-12
Enlarged Parking Lot Plan



ELEVATION - PERIMETER FENCE

ELEVATION - ENTRY SIGNAGE

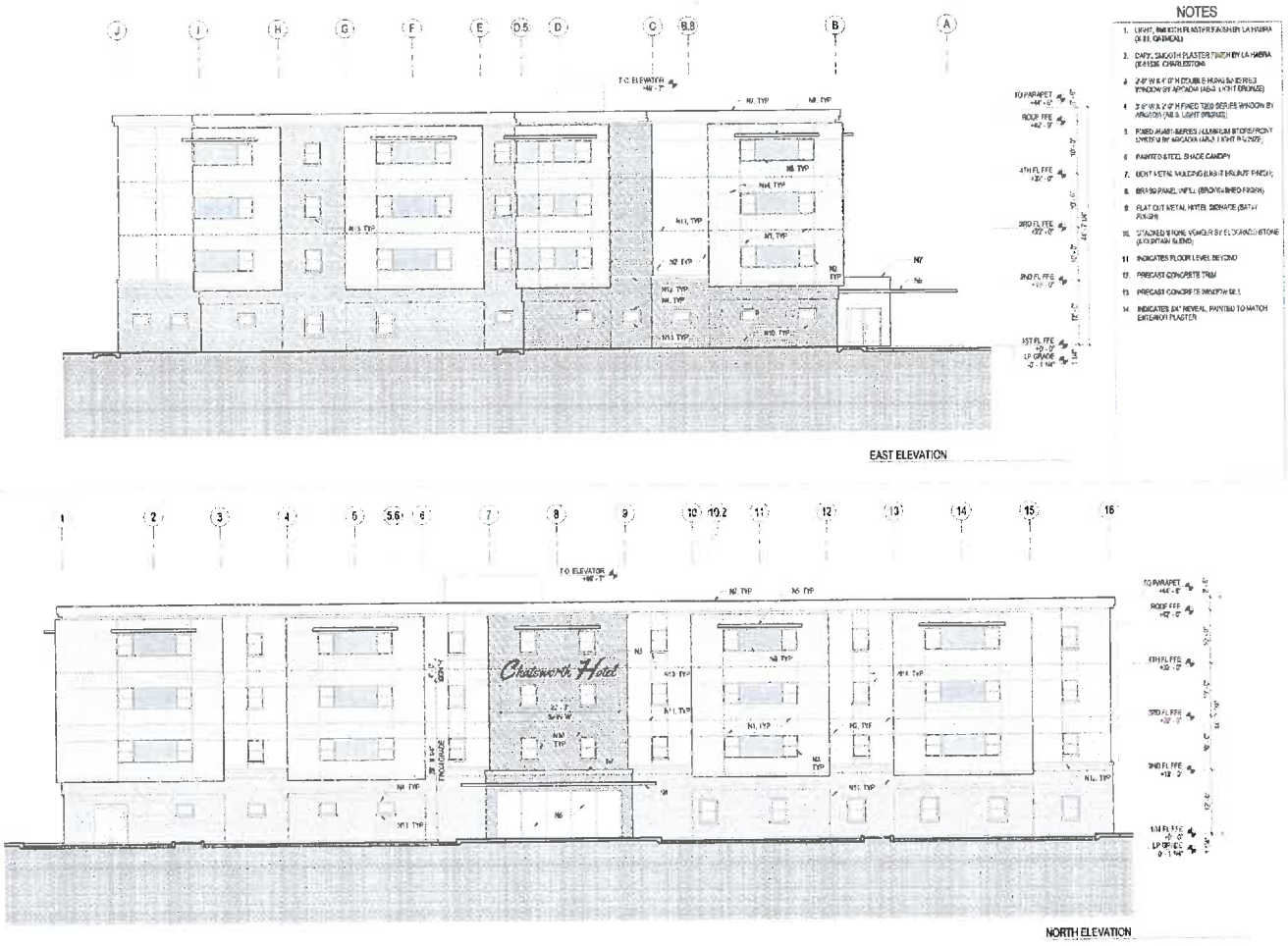


SITE ELEVATION - VIEW FROM TOPANGA CANYON BOULEVARD

Source: Omgiving Architects, 2017.

CAJA Environmental Services, LLC

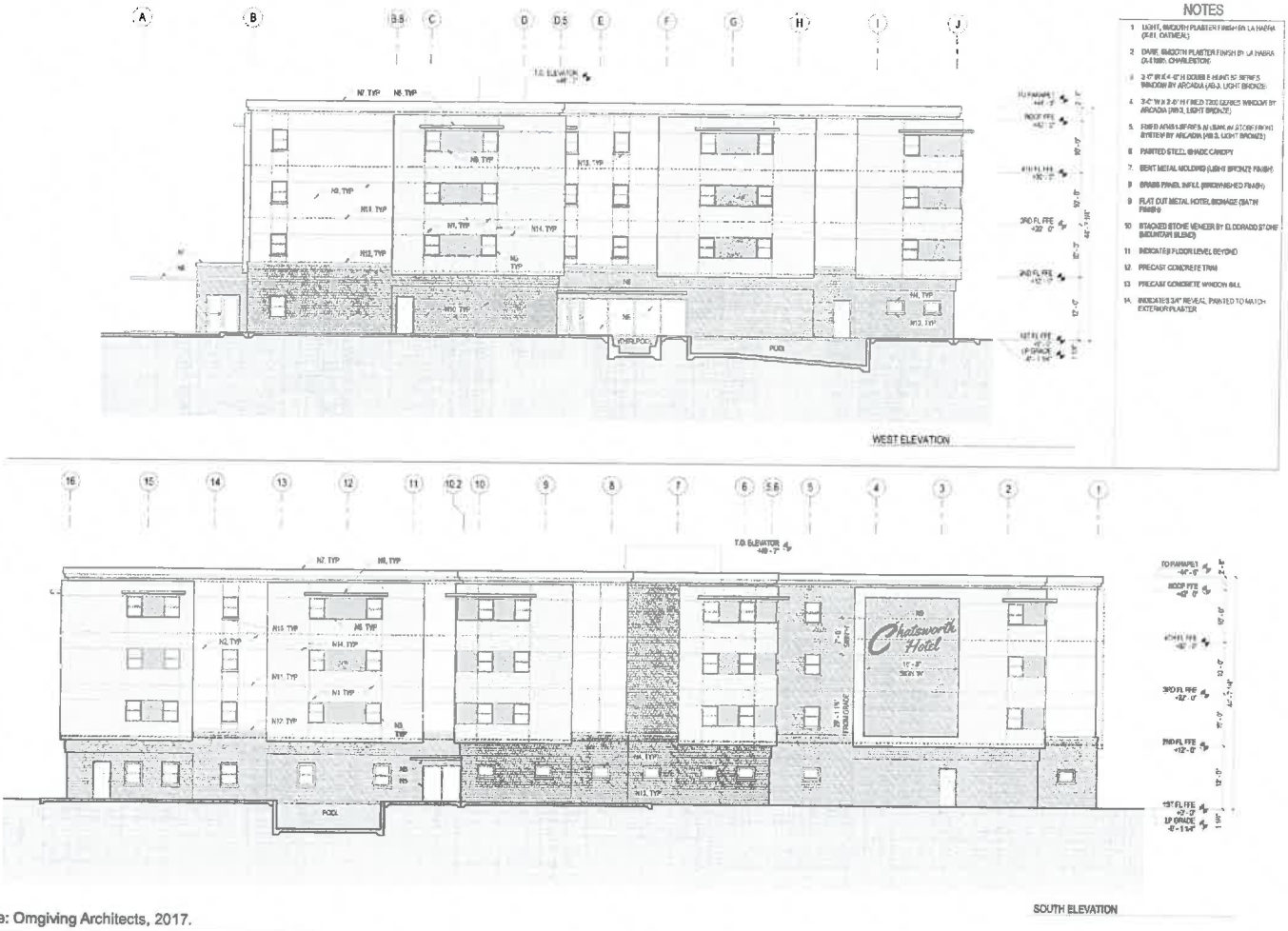
Figure II-13
Site Elevation



Source: Omgiving Architects, 2017.

CAJA Environmental Services, LLC

Figure II-14
North and East Elevations



Source: Omgiving Architects, 2017.

CAJA Environmental Services, LLC

Figure II-15
South and West Elevations

Source: Omgiving Architects, 2017.

CAJA Environmental Services, LLC

Figure II-16
Hotel Rendering from Parking Area

Source: Omgiving Architects, 2017.

CAJA Environmental Services, LLC

Figure II-17
Hotel Rendering from Topanga canyon Boulevard

Canyon Boulevard, with the majority of the parking (103 spaces) provided behind the building (west of the proposed hotel building). The proposed hotel building includes an entry vestibule at the main lobby entrance with two elevators to upper floors; a gift shop; guest amenities (including a business center, laundry room with washer/dryer, fitness equipment room, meeting room, and guest breakfast room); an employee rest area and relaxation room with showers; and business operational rooms including storage, maintenance, staff cafeteria room, and offices for the manager and sales staff. Three exit staircases and an outside swimming pool are also provided. Each of the upper floors (floors 2, 3, and 4) has 31-guest rooms, a vending/ice machine room, and housekeeping storage rooms. All guest rooms would be accessed from an interior corridor. The Project would require the export of approximately 5,500 cubic yards of soil.

Parking

Table II-1 shows a breakdown of the Project's parking requirements and the parking provided by the Project. Sixty-eight of the 127 parking spaces included as part of the Project would be covenant parking for the existing Radisson Hotel located just to the north of the Project site. Additionally, the Project would include 16 bicycle parking spaces (refer to Table II-2).

Table II-1
Project Parking

Land Use	LAMC Parking Requirement[1]	Parking Spaces Required
105 hotel rooms	1 space/room (first 30 rooms)	30 spaces
	1 space/2 rooms (next 30 rooms)	15 spaces
	1 space/3 rooms (in excess of 60 rooms [45 rooms])	15 spaces
	Subtotal	*60 spaces*
	Less bicycle parking reduction[2]	*-4 spaces*
	Radisson Hotel Covenant Parking	***68 spaces***
	Total Parking Required	*124 spaces*
	Total Parking Provided	**127 spaces**

[1] *LAMC Section 12.21 A.4(b)*
[2] *Per LAMC Section 12.21A.4, ...new or existing automobile parking spaces required by code for all uses may be replaced by bicycle parking at a ratio of one automobile parking space for every four bicycle parking spaces provided. Refer to Table II-2.*

Table II-2
Project Bicycle Parking

Land Use	LAMC Bicycle Parking Requirement[1]	Bicycle Parking Spaces Required
105 hotel rooms	Long-term: 1 space/20 rooms Short-term: 1 space/20 rooms	6 spaces[2] 6 spaces[2]
	Total Bicycle Parking Required	*12 spaces*
	Total Bicycle Parking Provided	**16 spaces (8 short-term, 8 long-term)**

[1] *LAMC Section 12.21 A.16(a)(2)*
[2] *5.25 spaces rounded up to 6 spaces.*

Access

Vehicular ingress and egress to the Project site would be provided via the existing driveway on Topanga Canyon Boulevard that provides access to the Radisson Hotel (refer to Figure II-7).

REQUESTED DISCRETIONARY ACTIONS

In order to implement the Project, the Project Applicant is requesting approval of the following discretionary actions from the City:

- Zone Change pursuant to LAMC Section 12.32F, from [Q]C2-1 Zone to C2-1 Zone;
- Conditional Use Approval pursuant to LAMC Section 12.24B to permit a Hotel within 500-feet of an R Zone, as permitted by LAMC Section 12.24W.24, and to permit a "public parking area" in the RA-1 Zone as permitted by LAMC Section 12.24W.37
- Variance pursuant to LAMC Section 12.27 to permit a building height of 45 feet within 50 to 99 feet of an RS-1 Zone in lieu of a permitted 33-foot building height pursuant to LAMC Section 12.21.1.A.10
- Project Permit Compliance pursuant to LAMC Section 11.5.7C to determine whether the Project is in compliance with applicable regulations of the Devonshire/Topanga Corridor Specific Plan and pursuant to Section 16.C of the Specific Plan for Design Review
- Site Plan Review pursuant to LAMC Section 16.05, to permit a development project of 50 or more guest rooms
- Removal Protected Tree to permit the removal of 2 protected trees, pursuant to LAMC Section 17.05R

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
AND CHECKLIST

LEAD AGENCY:	COUNCIL DISTRICT:	DATE:
City of Los Angeles	12	June 2017

RESPONSIBLE AGENCIES:
City of Los Angeles

PROJECT TITLE:	CASE NO.:
Chatsworth Hotel Project	ENV-2016-1357-MND CPC-2016-1356-VZC-CU-ZV-SPR-DRB-SPP

PROJECT DESCRIPTION: The Project includes removal of a portion of the existing surface parking lot that is located on part of the 1.95-acre Project site and development of the Project site with a 4-story (44 feet and 7 inches in height), 105-guest-room hotel and surface parking lot, which would include 127 vehicle parking spaces (68 parking spaces as required for the Radisson Hotel and 59 parking spaces for the Proposed Hotel) and 16 bicycle parking spaces. The Project would require the export of approximately 5,500 square feet of soil. To allow for development of the Project, the Applicant is requesting the following discretionary approvals: 1. Zone Change pursuant to LAMC Section 12.32F, from [Q]C2-1 Zone to C2-1 Zone; 2. Conditional Use Approval pursuant to LAMC Section 12.24B to permit a Hotel within 500-feet of an R Zone, as permitted by LAMC Section 12.24W.24, and to permit a "public parking area" in the RA-1 Zone as permitted by LAMC Section 12.24W.37; 3. Variance pursuant to LAMC Section 12.27 to permit a building height of 45 feet within 50 to 99 feet of an RS-1 Zone in lieu of a permitted 33-foot building height pursuant to LAMC Section 12.21.1.A.10; 4. Project Permit Compliance pursuant to LAMC Section 11.5.7C to determine whether the Project is in compliance with applicable regulations of the Devonshire/Topanga Corridor Specific Plan and pursuant to Section 16.C of the Specific Plan for Design Review; 5. Site Plan Review pursuant to LAMC Section 16.05, to permit a development project of 50 or more guest rooms; and 6. Removal Protected Tree to permit the removal of 2 protected trees, pursuant to LAMC Section 17.05R.

ENVIRONMENTAL SETTING: The Project site is located in the Chatsworth – Porter Ranch Community Plan Area of the City of Los Angeles (the "City"). Specifically, the 1.95-acre Project site is located at approximately 9777 Topanga Canyon Boulevard and is bound by the Radisson Hotel and single-family residential homes to the north, Topanga Canyon Boulevard to the east, a multi-family residential building to the south, and single-family residential homes to the west. The Assessor Parcel Number (APN) for the Project site 2727-012-065. An L-shaped surface parking lot with approximately 72 vehicle parking spaces is located in the eastern portion of the Project site; this parking lot provides off-site parking for the adjacent Radisson Hotel. The remainder of the Project site is undeveloped.

PROJECT LOCATION: 9755 Topanga Canyon Boulevard, Los Angeles, CA 91311

PLANNING DISTRICT:	STATUS
Chatsworth – Porter Ranch Community Plan	☐ PRELIMINARY ☐ PROPOSED ■ ADOPTED

EXISTING ZONING:	MAX. DENSITY ZONING:	■ DOES CONFORM TO PLAN
[Q]C2-1 RA-1	62,000 square feet of office/shopping; and up to two duplex residential units	☐ DOES NOT CONFORM TO PLAN
PLANNED LAND USE & ZONING: Community Commercial and Low 1 Residential, C2-1 and RA-1	**MAX. DENSITY PLAN:** 310 hotel guest rooms; and up to two duplex residential units	☐ NO DISTRICT PLAN
SURROUNDING LAND USES: RE11-1, RS-1. [Q]C2-1, [Q]MR1-1, PF-1XL	**PROJECT DENSITY:** 105 hotel guest rooms and parking; public parking area for 103 vehicles	

DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

SIGNATURE	TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    A. Earlier Analysis Used. Identify and state where they are available for review.

    B. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    C. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's

environmental effects in whichever format is selected.

9. The explanation of each issue should identify:

   A. The significance criteria or threshold, if any, used to evaluate each question; and

   B. The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- ■ Aesthetics
- ☐ Agricultural Resources
- ■ Air Quality
- ■ Biological Resource
- ☐ Cultural Resources
- ☐ Geology & Soils
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology & Water Quality
- ☐ Land Use & Planning
- ☐ Mineral Resources
- ■ Noise
- ☐ Population & Housing
- ☐ Public Services
- ☐ Recreation
- ■ Transportation/Traffic
- ■ Tribal Cultural Resources
- ☐ Utilities & Service Systems
- ■ Mandatory Findings of Significance

INITIAL STUDY CHECKLIST (to be completed by the Lead Agency)

BACKGROUND

PROPONENT NAME Paradigm SSB, LLC	**PHONE NUMBER** 818-709-7054 x7518
PROPONENT ADDRESS 9777 Topanga Canyon Boulevard Los Angeles, CA 91311	**PROPONENT REPRESENTATIVE** Mr. Andy Wu, Managing Partner
AGENCY REQUIRING CHECKLIST City of Los Angeles	**DATE SUBMITTED** July 2017
PROPOSAL NAME (if applicable) Chatsworth Hotel Project	

ENVIRONMENTAL IMPACTS

Explanations of all potentially and less than significant impacts are required to be attached on separate sheets.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. **Aesthetics.** Would the project:				
a. Have a substantial adverse effect on a scenic vista?			✓	
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?		✓		
c. Substantially degrade the existing visual character or quality of the site and its surroundings?			✓	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓	

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. **Agriculture and Forestry Resources.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 [g])?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				✓

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3. **Air Quality.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan			✓	
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		✓		
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		✓		
d. Expose sensitive receptors to substantial pollutant concentrations?		✓		
e. Create objectionable odors affecting a substantial number of people?				✓

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4. **Biological Resources.** Would the project::				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		✓		
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				✓
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				✓
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance		✓		
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
5. **Cultural Resources.** Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?				✓
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			✓	
c. Directly or indirectly destroy a unique paleontological resource or site or			✓	

5. **Cultural Resources.** Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
unique geologic feature?				
d. Disturb any human remains, including those interred outside of formal cemeteries?			✓	

6. **Geology & Soils.** Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓
b. Strong seismic ground shaking?			✓	
c. Seismic-related ground failure, including liquefaction?			✓	
d. Landslides?				✓
b. Result in substantial soil erosion or the loss of topsoil?			✓	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✓	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			✓	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓

7. **Greenhouse Gas Emissions.** Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

8. **Hazards & Hazardous Materials.** Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b. Create a significant hazard to the public or the environment through			✓	

8. Hazards & Hazardous Materials. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✓
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				✓
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				✓
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✓
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				✓

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

9. Hydrology & Water Quality. Would the project:

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
j. Inundation by seiche, tsunami or mudflow?

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			✓
			✓

10. Land Use and Planning. Would the project:

a. Physically divide an established community?
b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			✓
		✓	
			✓

11. Mineral Resources. Would the project:

a. Result in the loss or availability of a known mineral resource that would be of value to the region and the residents or the state?
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			✓
			✓

12. Noise. Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	✓		
		✓	
	✓		
	✓		
			✓

12. Noise. Would the project result in:

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			✓

f. For a project within the vicinity of a private airstrip would the project expose people residing or working in the project area to excessive noise levels?

13. Population and Housing. Would the project:

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
		✓	
			✓
			✓

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

14. Public Services.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
		✓	
		✓	
		✓	
			✓
			✓

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
   i. Fire protection?
   ii. Police protection?
   iii. Schools?
   iv. Parks?
   v. Other public facilities?

15. Recreation.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
			✓
			✓

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
b. Does the project include recreational facilities or require the construction or expansion on recreational facilities which might have an adverse physical effect on the environment?

16. Transportation/Traffic. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?		✓		
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the count congestion management agency for designated roads or highways?			✓	
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				✓
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓	
e. Result in inadequate emergency access?			✓	

17. Tribal Cultural Resources. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native tribe, and that is:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?			✓	
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		✓		

18. Utilities & Service Systems. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			✓	
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			✓	
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			✓	
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			✓	

18. Utilities & Service Systems. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			✓	
g. Comply with federal, state, and local statutes and regulations related to solid waste?			✓	

19. Mandatory Findings of Significance.

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

IV. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS

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

Less Than Significant Impact. The Project site is located on Topanga Canyon Boulevard in the Chatsworth-Porter Ranch Community Plan Area of the City of Los Angeles (the "City"). Within the Project site area, Topanga Canyon Boulevard is largely developed with existing commercial, manufacturing, and multi-family residential land uses in low- to mid-rise buildings. The Simi Hills (located to the west of the Project area) and the Santa Susana Mountains (located to the north of the Project area) are partially visible from within the Project area and near the Project site, mostly obscured by existing development. Additionally, the Chatsworth-Porter Ranch Community Plan Area designates several Major and Secondary Highways as Scenic Highways. No roadways near the Project site are designated as Scenic Highways. The Project includes development of the Project site with a four-story hotel, similar in height to the existing hotel located just to the north of the Project site and to the multi-family residential structure located to the south of the Project site, and would not have any adverse effect on a scenic vista. Therefore, no significant impacts related to scenic vistas would occur.

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

Less Than Significant With Mitigation Incorporated. None of the roadways near the Project site is designated as a State scenic highway. No rock outcroppings or historic buildings are located on the Project site. However, the Project site is subject to ZI-1732, which requires the Department of Building and Safety to notify Council District 12 prior to issuance of a grading permit for the Project. Additionally, 13 trees were identified on the Project site by the landscape architect's tree inventory. Pursuant to the City of Los Angeles' Protected Tree Ordinance (Ordinance No. 177404) a "protected tree" is defined as an oak, black walnut, sycamore or California bay tree with a trunk diameter of 4-inches or greater. Of the 13 trees inventoried, 5 trees are protected coast live oak. Subsequent to the inventory, one of the coast live oak trees was removed through the issuance of an Emergency Tree Removal Permit in February 2017, due to safety concerns. As a result, 4 protected coast live oak trees remain. Additionally, the tree inventory identified 5 non-protected trees of a different species, including 2 queen palms, 1 Mexican fan palm, 1 windmill palm, and 1 California pepper. However, only the 2 queen palms and Mexican fan palm have trunk diameters greater than 8-inches. Two of the protected trees would be protected in place; 2 protected trees would be removed as part of the Project. All of the non-protected trees would be removed as part of the Project's construction phase. However, as required by the City and as outlined in Mitigation Measures 1-1 and 1-2, all removed protected trees shall be replaced on the Project site at a 2:1 ratio, and all removed non-protected trees shall be replaced at a 1:1 ratio (respectively), subject to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works review and approval

prior to implementation of the mitigation measures. Therefore, with implementation of these mitigation measures, the Project would not result in any significant impacts related to trees.

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

Less Than Significant Impact. The Project site is located in an urbanized area of Los Angeles. The eastern portion of the Project site is currently developed with an L-shaped parking lot that serves the existing four-story Radisson Hotel located directly north of the Project site. The southern boundary of the Project site runs adjacent to an existing four-story multi-family residential building. The western portion of the Project site is undeveloped but is surrounded by existing development including the multi-family residential building to the south and single-family residential development to the west and north. Other development in the immediate Project site area include commercial uses along (north and south) Topanga Canyon Boulevard, manufacturing/warehouse uses to the east, and primarily single-family residential development to the west and southwest, with the exception of the multi-family residential building located just to the south of the Project site. The Project includes development of the Project site with a four-story hotel and surface parking. The height and architecture of the proposed hotel would be similar to that of the existing hotel located just to the north of the Project site and the height of the multi-family residential structure located to the south of the Project site. The currently undeveloped portion of the Project site would be developed with surface parking and would maintain an "open" character. Although the Project would change the visual character of the Project site and surrounding area, this change would not constitute a substantial degradation. Therefore, Project impacts related to visual character would be less than significant.

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

Less Than Significant Impact. The Project site is located in an urbanized area of Los Angeles. The eastern portion of the Project site is currently developed with an L-shaped parking lot that serves the existing four-story Radisson Hotel located directly north of the Project site. Sources of light and glare associated with the parking lot include typical parking lot nighttime lighting poles and reflections off of parked vehicles during the day. The western portion of the Project site is undeveloped but is surrounded by existing development including a multi-family residential building to the south and single-family residential development to the west and north. Other development in the immediate Project site area include commercial uses along (north and south) Topanga Canyon Boulevard, manufacturing/warehouse uses to the east, and primarily single-family residential development to the west and southwest, with the exception of the multi-family residential building located just to the south of the Project site. All of these land uses produce light and glare (e.g., indoor/outdoor lighting, windows, light-colored surfaces, etc.) typical of such uses in an urbanized area of the City. The Project would include interior and exterior lighting that complies with the LAMC provision that requires minimizing the effect of the new sources of lighting. Specifically, LAMC Section 91.6205 requires that new lighting sources not exceed 1 foot-

candle of new light spillover at residential property lines. Consequently, no substantial changes in nighttime illumination would occur that would adversely affect nighttime views in the area and prevent spillover lighting. Also, the Project would be required to use non-reflective glass, pursuant to LAMC Section 93.0117. Therefore, Project impacts related to light and glare would be less than significant.

Mitigation Measure (Aesthetics)

To ensure that Project impacts related to trees would be less than significant, the following mitigation measures are required:

1-1: ***Protected Trees***

- All protected tree removals shall require approval from the Board of Public Works.
- A Tree Report shall be submitted to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, for review and approval prior to implementation of the Report's recommended measures.
- A minimum of two trees (a minimum of 15-inch box in size if available) shall be planted for each protected tree that is removed. The canopy of the replacement trees, at the time they are planted, shall be in proportion to the canopies of the protected tree(s) removed and shall be to the satisfaction of the Urban Forestry Division.
- The location of the trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required landscape plan, which shall also indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.

1-2: ***Non-Protected Trees***

- Prior to issuance of any permit related to development of the Project, a plot plan shall be prepared for the Project, indicating the location, size, type, and general condition of all existing trees on the Project site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net new trees located within the parkway of the adjacent public-right(s)-of-way may be counted toward replacement tree requirements.
- Removal or planning of any tree in the public right-of-way shall require approval of the Board of Public Works. All trees in the public right-of-way shall be provided in

the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

2. AGRICULTURE AND FORESTRY RESOURCES

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project site is not included in the Important Farmland category.[1] Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

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

No Impact. The Project site is not zoned for agricultural use, and the site is not under a Williamson Act Contract.[2] Thus, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project site is not zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project site does not contain any forest land. Therefore, no impacts related to this issue would occur.

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1 *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.*

2 *Ibid.*

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

No Impact. The Project site and surrounding area are developed with urban land uses. No agricultural uses are located on the Project site or within the area. Therefore, no impacts related to this issue would occur.

3. AIR QUALITY

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

Less Than Significant Impact. In the case of projects proposed within the City or elsewhere in the South Coast Air Basin (the "Basin"), the applicable plan is the 2012 Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

The regional ozone attainment plan centers on accommodating population growth forecasts by SCAG. Specifically, SCAG's growth forecasts from the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City by 2020.

The Project includes development of the Project site with a 105-guest-room hotel and surface parking. The Project would employ approximately 50 persons. The types of jobs that would be made available by the Project could be filled by people already living in the Project area and surrounding communities. The Project would not create such an increase in employment that would cause a substantial number of new people to move to the Project area and surrounding communities to fill the employment positions. Also, the Project does not include the development of housing and would be served by existing roadways and utility infrastructure. For these reasons, the Project would not induce population growth that has not been planned for by SCAG. Thus, the Project would be consistent with the 2012 AQMP. Therefore, impacts related to AQMP consistency would be less than significant.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant With Mitigation Incorporated. Both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Project are discussed below. This analysis focuses on two levels of impacts: pollutant emissions and pollutant concentrations. "Emissions" refer to the quantity of pollutants released into the air, as measured in pounds per day. "Concentrations" refer to the amount of pollutant material per volumetric unit of air, as measured in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$).

Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter ten microns or less in diameter (PM_{10}), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.[3] The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

- Ozone (O_3) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO_X) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted

[3] *Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.*

into the atmosphere. The primary sources of ROG and NO_X, the components of O_3, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

- Nitrogen Dioxide (NO_2) like O_3, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_X and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10}. High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.

- Sulfur Dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO_2 are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 can also yellow plant leaves and erode iron and steel.

- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC. Inhalable particulate matter, or PM_{10}, is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

  $PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed

gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

  Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

- Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

Regulatory Setting

Federal

The United States Environmental Protection Agency (the "USEPA") is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. The USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in states other than California, where automobiles must meet stricter emission standards set by the California Air Resources Board (CARB).

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and Pb. The CAA requires the USEPA to designate areas as attainment, non-attainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved.

The federal standards are summarized on Table IV-1. The USEPA has classified the South Coast Air Basin as non-attainment for O_3, $PM_{2.5}$, and PM_{10} and maintenance for CO and NO_2.

Table IV-1
State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	N/A[1]	0.075 ppm (147 µg/m^3)	Non-attainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Non-attainment
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	15 µg/m^3	Non-attainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Non-attainment	53 ppb (100 µg/m^3)	Maintenance
	1-hour	0.18 ppm (338 µg/m^3)	Non-attainment	100 ppb (188 µg/m^3)	Maintenance
Sulfur Dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
Lead (Pb)	30-day average	1.5 µg/m^3	Non-attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Attainment

[1] *N/A = CARB has not determined 8-hour O_3 attainment status*
Source: CARB, Ambient Air Quality Standards, and attainment status, (www.arb.ca.gov/desig/adm/adm.htm).

State

In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992,

requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The state standards are summarized on Table IV-1.

The CCAA requires CARB to designate areas within California as either attainment or non-attainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as non-attainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as non-attainment. Under the CCAA, the Los Angeles County portion of the South Coast Air Basin is designated as a non-attainment area for O_3, $PM_{2.5}$, and PM_{10}.[4]

Local

South Coast Air Quality Management District

The 1977 Lewis Air Quality Management Act merged four air pollution control district to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

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[4] *CARB, Area Designation Maps, available at http://www.arb.ca.gov/desig/adm/adm.htm, accessed August 17, 2013.*

All areas designated as non-attainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour $PM_{2.5}$ strategy standard by 2014.

In addition to criteria pollutants, the SCAQMD also regulates air toxics. A cornerstone of its work was the development of the Multiple Air Toxics Exposure Study (MATES-III). The monitoring program measured more than 30 air pollutants, including both gases and particulates, and estimated the risk of cancer from breathing toxic air pollution throughout the region. MATES-III found that the cancer risk in the region from carcinogenic air pollutants ranges from about 870 in a million to 1,400 in a million, with an average regional risk of about 1,200 in a million. An addendum to the plan was completed in March 2004 that included an update on the implementation of the mobile and stationary source strategies.

In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

City of Los Angeles

Air quality policies are governed by the City's General Plan, which includes an Air Quality Element. Adopted on November 24, 1992, the Element includes six key goals that relate directly or indirectly to air quality:

1. Good air quality in an environment of continued population growth and healthy economic structure.

2. Less reliance on single-occupant vehicles with fewer commute and non-work trips.

3. Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.

4. Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

5. Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.

6. Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Air Pollution Climatology

The Project site is located within the Los Angeles County non-desert portion of the Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains.

Air quality problems also occur during the fall and winter, when CO and NO_2 emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO_2 concentrations are also generally higher during fall and winter days.

Air Monitoring Data

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project site is located in SCAQMD's West San Fernando Valley receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project site area. Table IV-2 shows pollutant levels, state, and federal standards, and the number of exceedances recorded in the area from 2012 through 2014. The one-hour State standard for O_3 was exceeded 21 times during this three-year period, the daily State standard for $PM_{2.5}$ was exceeded three times. CO and NO_2 levels did not exceed the CAAQS from 2012 to 2014.

Table IV-2
2012-2014 Ambient Air Quality Data in the Project Site Vicinity

Pollutant	Pollutant Concentration & Standards	West San Fernando Valley		
		2012	2013	2014
Ozone	Maximum 1-hour Concentration (ppm)	0.117	0.124	0.116
	Days > 0.09 ppm (State 1-hour standard)	8	7	6
	Days > 0.075 ppm (Federal 8-hour standard)	8	11	1
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	N/A	N/A	4.0
	Days > 20 ppm (State 1-hour standard)	N/A	N/A	N/A
	Maximum 8-hour Concentration (ppm)	2.8	2.3	3.0
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0709	0.0582	0.0589
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}	Maximum 24-hour Concentration ($\mu g/m^3$)	N/A	N/A	N/A
	Days > 50 $\mu g/m^3$ (State 24-hour standard)	N/A	N/A	N/A
$PM_{2.5}$	Maximum 24-hour Concentration ($\mu g/m^3$)	41.6	41.8	27.2
	Days > 35 $\mu g/m^3$ (Federal 24-hour standard)	2	1	0
Sulfur Dioxide	Maximum 24-hour Concentration (ppm)	N/A	N/A	N/A
	Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A

Source: SCAQMD annual monitoring data (www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year) accessed February 19, 2016.
N/A: Not available at this monitoring station.

Toxic Air Pollution

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV), the incidence of cancer over a lifetime in the US population is about 1 in 4, to 1 in 3, which translates into a risk of about 300,000 in 1 million. One study, the *Harvard Report on Cancer Prevention*, estimated that, of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures. The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per million, this would predict an additional 100 excess cases of cancer in a population of 1 million people over a 70-year lifetime.

As part of the SCAQMD's environmental justice initiatives adopted in late 1997, the SCAQMD adopted the MATES IV study in May 2015, which was a follow-up to the previous MATES I, II, and III air toxics studies conducted in the Basin. The MATES IV study was based on monitored data throughout the Basin and included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to

characterize carcinogenic risk across the Basin from exposure to TACs. The MATES IV study applied a 2-kilometer (1.24-mile) grid over the Basin and reported carcinogenic risk within each grid space (each covering an area of 4 square kilometers or 1.54 square miles). The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 897 in 1 million primarily due to diesel exhaust particulate matter (DPM). Using the MATES IV methodology, about 94 percent of the cancer risk is attributed to emissions associated with mobile sources, and about 6 percent of the risk is attributed to toxics emitted from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations. The MATES IV study found lower ambient concentrations of most of the measured air toxics, as compared to the levels measured in the previous MATES III study finalized in September 2008.

Existing Emissions

The Project site includes a surface parking lot that serves the adjacent Radisson Hotel to the north and a vacant lot. As such, the Project site does not generate any anthropogenic emissions. To ensure a conservative analysis, no emissions are assumed to be generated at the Project site.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

Sensitive receptors near the Project site include the following:

- Kinzie Street residences, single-family residences, 20 feet northwest of the Project site.
- Cielo Apartments, as close as 20 feet south of the Project site.
- Nevada Avenue residences, up to 90 feet west of the Project site.
- Pacific Oaks Apartments, 9825 Topanga Canyon Boulevard, about 320 feet north of the Project site.

Project Impacts

Construction – Regional Emissions

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2013.2.2 model using assumptions from the Project's developer, including the Project's construction schedule of 18 months. Table IV-3 summarizes the Project's approximate construction schedule.

Table IV-3
Project Site Construction Schedule

Phase	Duration	Notes
Demolition	10/1/17-10/22/17	Debris from existing surface parking hauled off-site
Site Preparation	10/23/17-11/1/17	
Grading	11/2/17-11/30/17	5,500 cubic yards of soil export
Building Construction	12/1/17-3/1/19	
Paving	3/2/19-3/16/19	
Architectural Coatings	3/17/19-4/24/19	
Source: DKA Planning, 2016		

As shown on Table IV-4, the construction of the Project would not produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions in excess of SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). Therefore, Project impacts related to regional construction emissions would be less than significant.

Construction – Localized Emissions

In terms of local air quality, the Project would not generate pollutant emissions in excess of SCAQMD's recommended localized standards of significance for NO_2, CO and $PM_{2.5}$ during the construction phase (refer to Table IV-4). However, construction activities could produce PM_{10} emissions that exceed localized thresholds recommended by the SCAQMD, primarily from vehicle exhaust and fugitive dust emissions from off-road construction vehicles during the site demolition phase. Nonetheless, implementation of Mitigation Measures 3-1 through 3-4 would reduce the Project's emissions of PM_{10} to below SCAQMD's significance thresholds for these emissions, and Project impacts related to localized construction emissions would be less than significant (refer to Table IV-6 shown after .

Table IV-4
Estimated Daily Construction Emissions - Unmitigated

Construction Phase	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition						
On-Site Emissions	1	11	9	<1	10	2
Off-Site Emissions	1	11	9	<1	1	<1
Total Emissions	2	21	17	<1	11	2
Site Preparation						
On-Site Emissions	1	13	7	<1	1	1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	1	13	7	<1	1	1
Grading						
On-Site Emissions	2	15	12	<1	2	1
Off-Site Emissions	1	9	7	<1	1	<1
Total Emissions	2	24	19	<1	3	2
Building Construction						
On-Site Emissions	3	19	14	<1	1	1
Off-Site Emissions	1	3	13	<1	2	1
Total Emissions	4	22	27	<1	3	2
Paving						
On-Site Emissions	1	8	7	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	1	8	7	<1	1	1
Architectural Coatings						
On-Site Emissions	66	2	2	<1	<1	<1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	66	2	2	<1	<1	<1
Maximum Regional Total	66	24	19	<1	11	2
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	66	15	12	<1	10	2
Localized Significance Threshold	--	103	535	--	4	3
Exceed Threshold?	No	No	No	No	Yes	No

Source: DKA Planning, 2016. Refer to Appendix B. Based on CalEEMod 2013.2.2 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in the West San Fernando Valley source receptor area.

Operation – Regional Emissions

The Project would produce long-term air quality emissions, primarily associated with vehicular traffic. The Project could add up to 1,111 net weekday vehicle trips to and from the Project site on a peak weekday at the start of operations in 2017.[5] However, as shown on Table IV-5, operational emissions

[5] *Traffic Impact Study, Chatsworth Hotel Project, August, 25, 2015 (refer to Appendix F). The trip generation conservatively reflects a 136-guest-room hotel rather than a 105-guest-room hotel, which is now proposed.*

would not exceed SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10} and $PM_{2.5}$ emissions. Therefore, Project impacts related to regional operational emissions would be less than significant.

Table IV-5
Estimated Daily Project Operational Emissions

Emissions Source	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Source	2	<1	<1	<1	<1	<1
Energy Source	<1	1	<1	<1	<1	<1
Mobile Source	3	8	35	<1	6	2
Total Operational Emissions	**6**	**9**	**35**	**<1**	**6**	**2**
Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Localized Total	**2**	**1**	**<1**	**<1**	**<1**	**<1**
Localized Threshold	-	**103**	**426**	-	**1**	**1**
Exceed Threshold?	N/A	No	No	N/A	No	No
Source: DKA Planning, 2016.						

Operation – Localized Emission

With regard to localized air quality emissions, the Project would emit minimal emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from area and energy sources on-site. As shown on Table IV-5, these localized emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. Therefore, Project impacts related to localized operational emissions would be less than significant.

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

Less Than Significant With Mitigation Incorporated. The SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[6] Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. The

[6] *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.*

SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As discussed in response to Checklist Question 3b, with mitigation, the Project would not produce VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10} emissions in excess of SCAQMD's significance thresholds. As such, the Project's contribution to cumulative pollutant emissions would not be considerable.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant With Mitigation Incorporated. As discussed in response to Checklist Question 3b, with mitigation, the Project would not produce VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10} emissions in excess of SCAQMD's significance thresholds. As such, the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, Project impacts related to this issue would be less than significant.

e) Would the project create objectionable odors affecting a substantial number of people?

No Impact. The Project includes development of a hotel building on the Project site and would not generate any odors. Therefore, the Project would not create objectionable odors affecting a substantial number of people.

Mitigation Measures (Air Quality)

With implementation the following mitigation measures, Project impacts related to localized construction emissions would be less than significant (refer to Table IV-6):

3-1 All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards to reduce NO_x, PM_{10}, and $PM_{2.5}$ emissions at the Project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

3-2 Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year NO_x emissions requirements.

3-3 At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided to the Department of Building and Safety.

Table IV-6
Estimated Daily Construction Emissions - Mitigated

Construction Phase	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition						
On-Site Emissions	<1	<1	8	<1	1	1
Off-Site Emissions	1	11	9	<1	<1	<1
Total Emissions	1	11	16	<1	1	1
Site Preparation						
On-Site Emissions	<1	<1	7	<1	<1	<1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	<1	1	7	<1	<1	<1
Grading						
On-Site Emissions	<1	1	11	<1	<1	<1
Off-Site Emissions	1	9	7	<1	1	<1
Total Emissions	1	1	18	<1	1	<1
Building Construction						
On-Site Emissions	1	28	34	<1	2	2
Off-Site Emissions	<1	1	6	<1	1	<1
Total Emissions	1	29	40	<1	3	2
Paving						
On-Site Emissions	<1	<1	7	<1	<1	<1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	<1	<1	8	<1	<1	<1
Architectural Coatings						
On-Site Emissions	65	<1	2	<1	<1	<1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	65	<1	2	<1	<1	<1
Maximum Regional Total	65	29	40	<1	3	2
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	65	28	34	<1	2	2
Localized Significance Threshold	--	80	498	--	4	3
Exceed Threshold?	No	No	No	No	No	No

Source: DKA Planning, 2016. Refer to Appendix B. Based on CalEEMod 2013.2.2 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in the West San Fernando Valley source receptor area.

3-4 Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy-duty construction equipment. More information on this program can be found at: http://www.aqmd.gov/home/programs/business/business-detail?title=off-road- diesel-engines&parent=vehicle-engine-upgrades

3-5 Construction activities shall comply with SCAQMD Rule 403, including the following measures:

- Apply water to disturbed areas of the site three times a day.

- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes.
- Appoint a construction-relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
- Limit soil disturbance to the amounts analyzed in the Final MND.
- All materials transported off-site shall be securely covered.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Traffic speeds on all unpaved roads shall be reduced to 5 mph or less.

3-6 Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.

4. BIOLOGICAL RESOURCES

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

Less Than Significant With Mitigation Incorporated. The Project site is located in an urbanized area of the City and is surrounded by existing residential development. The Project site contains 11 trees that would be removed as part of the Project. Depending on the time of year that the Project site is developed, nesting species (which are protected by law) could be using the trees on the Project site. As such, the Project Applicant would be required to implement Mitigation Measure IV-1 to ensure that no significant impacts related to nesting birds would occur. Therefore, impacts related to this issue would be less than significant.

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

No Impact. The Project site and surrounding area are completely developed with urbanized land uses. No riparian habitat or sensitive natural communities are located on or near the Project site. Thus, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project site and surrounding area are completely developed with urbanized land uses. No wetlands are located on or near the Project site. Thus, the Project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project site and surrounding area are completely developed with urbanized land uses and are not part of a migratory wildlife corridor or near a native wildlife nursery site. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Therefore, no impacts related to this issue would occur.

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

Less Than Significant With Mitigation Incorporated. As discussed in response to Checklist Question 1b, 13 trees are located on the Project site, 11 of which would be removed during the Project's construction phase. However, as required by the City and as outlined in Mitigation Measures 1-1 and 1-2, all removed protected trees shall be replaced on the Project site at a 2:1 ratio, and all removed non-protected trees shall be replaced at a 1:1 ratio (respectively), subject to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works review and approval prior to implementation of the mitigation measures. Therefore, with implementation of these mitigation measures, the Project would not result in any significant impacts related to trees.

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

No Impact. The Project site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impacts related to this issue would occur.

Mitigation Measures (Biological Resources)

To ensure that Project impacts related to biological resources would be less than significant, the following mitigation measure is required:

4-1 Nesting Species

To avoid potential significant impacts to nesting birds, including migratory birds and raptors, one of the following shall be implemented by the Project Applicant:

- Project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season, which generally runs from March 1st - August 31st (as early as February 1st for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

  If Project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

  a. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.

  b. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31st.

  c. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

d. The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds., Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

5. CULTURAL RESOURCES

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

No Impact. A significant impact would occur if the Project would substantially alter the environmental context of, or remove identified historical resources. The Project site has no structures, and the site has not been identified as a historic resource by local or state agencies. Also, the Project site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register, and/or any local register. In addition, the Project site was not found to be a potential historic resource based on SurveyLA, the citywide survey of Los Angeles or the City's HistoricPlacesLA website. Thus, the Project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. Therefore, no impacts related to historical resources would occur as a result of the Project.

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

Less Than Significant Impact. Based on a records search conducted by the South Central Coast Information Center (refer to Appendix C), one archaeological site has been recorded within a 0.5-mile radius of the Project site, and no sites have been recorded at the Project site. It is possible that unknown archaeological resources could exist at the Project site, given the relative sensitivity of the Project region for archaeological resources. As such, prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project site. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment, in conformance with California Public Resources Code Section 21083.2. However, construction activities could continue in other areas of the Project site. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law. Through compliance with these requirements, potential Project impacts to unknown archaeological resources would be less than significant.

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

Less Than Significant Impact. The Project site does not contain any unique geologic features. A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood for unique paleontological resources to occur at the Project site (refer to Appendix C). The records search revealed that no paleontological resources are known to exist at the Project site. However, fossils have been found in the sedimentary deposits that exist within the Project area and at the Project site and asphalt deposits that exist in the Project area. As such, there is a possibility that unknown paleontological resources could be encountered during the Project's excavation phase. However, prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying paleontological or unique geologic resources or sites from the Project site. In addition, in the event that paleontological resources or sites, or unique geologic features are exposed during Project construction, work within 50 feet of the find shall stop until a professional paleontologist, can identify and evaluate the significance of the discovery and develop recommendations for treatment. However, construction activities could continue in other areas of the Project site. Recommendations could include a preparation of a Treatment Plan, which could require recordation, collection, and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any paleontological resources or sites, or unique geologic features shall be treated in accordance with State Law. Through compliance with these requirements, potential Project impacts to unknown paleontological resources or sites, or unique geologic features would be less than significant.

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

Less Than Significant Impact. No human remains are known to exist at the Project site. However, in accordance with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project site, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The Coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the Coroner of the discovery or recognition of the human remains. If the Coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone

within 24 hours, the Native American Heritage Commission. Through compliance with this regulation, potential Project impacts to human remains would be less than significant.

6. GEOLOGY AND SOILS

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?

No Impact. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project site.[7] Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault on the Project site. Therefore, no significant impacts related to this issue would occur.

b) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Less Than Significant Impact. Given the Project site's location in a seismically active region, the Project site could experience seismic ground shaking in the event of an earthquake. However, the Project Applicant would be required by the City to design and construct the Project in conformance to the most recently adopted Building Code and applicable recommendations made in a Final Geotechnical Report prepared for the Project. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event and thus, not cause or accelerate geologic hazards or expose people to substantial risk of injury associated with strong seismic ground shaking. Therefore, Project impacts related to ground shaking would be less than significant.

c) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. According to the Geotechnical Investigation prepared for the Project (refer to Appendix D), soils in the northeastern portion of the Project site could be subject to liquefaction. Additionally, an evaluation of the potential seismically-induced settlement at the Project site determined

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[7] *Geotechnical Investigation, RMA GeoScience, August 25, 2015 (refer to Appendix D).*

that the settlement of approximately 2.64 inches could occur. However, the Project Applicant would be required by the City to design and construct the Project in conformance to the most recently adopted Building Code and applicable recommendations made in a Final Geotechnical Report prepared for the Project, including building standards and recommendations to prevent potential adverse effects associated with liquefaction. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event and thus, not cause or accelerate geologic hazards or expose people to substantial risk of injury associated with liquefaction. Therefore, no significant impacts related to liquefaction would occur.

d) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

No Impact. According to the Geotechnical Investigation prepared for the Project (refer to Appendix D), the Project site is not located within a "Zone of Required Investigation for Earthquake-Induced Landslides." Additionally, the Project site is relatively flat, and earthquake-induced landsliding is not a hazard to development of the Project site. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. Construction of the Project would result in ground surface disturbance during site clearance, excavation, and grading, which could create the potential for soil erosion to occur. During the Project's construction phase, the Project developer would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, construction activities would be performed in accordance with the requirements of the Los Angeles Building Code and the Los Angeles Regional Water Quality Control Board (LARWQCB) through the City's Stormwater Management Division. The Project developer would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs

during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. All onsite grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, and conditions imposed by the City of Los Angeles Department of Building and Safety's Soils Report Approval Letter, which will be issued during the entitlements/permitting process. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Additionally, during the Project's operational phase, most of the Project site would be developed with impervious surface, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Thus, no significant impacts related to erosion would occur as a result of Project operation.

f) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. Impacts related to liquefaction are discussed in response to Checklist Question 6aiii. Impacts related to landslides are discussed in response to Checklist Question 6aiv. According to the Geotechnical Investigation prepared for the Project (refer to Appendix D), maximum total and differential settlements are expected to be approximately 2.99 inches. As stated previously, the Project Applicant would be required by the City to design and construct the Project in conformance to the most recently adopted Building Code and applicable recommendations made in a Final Geotechnical Report prepared for the Project. Conformance with the City's current Building Code requirements would minimize the potential for settlement to occur at the Project site. Therefore, Project impacts related to settlement would be less than significant.

g) Would the project be located on expansive soil, as identified on Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact. Based on the Geotechnical Investigation prepared for the Project (refer to Appendix D), soils at the Project site have a very low potential. Nonetheless, the Project Applicant would be required by the City to design and construct the Project in conformance to the most recently adopted Building Code and applicable recommendations made in a Final Geotechnical Report prepared for the Project. Conformance with the City's current Building Code requirements would ensure that no significant impacts related to expansive soil would occur as a result of the Project. Therefore, Project impacts related to expansive soils would be less than significant.

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

No Impact. The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative

wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur.

7. GREENHOUSE GAS EMISSIONS

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

Less Than Significant Impact. The GHG emissions modeling results are included in Appendix B.

Background

Various gases in the Earth's atmosphere, classified as atmospheric GHG emissions, play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHG emissions are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

GHG emissions that contribute to the greenhouse effect include:

- Carbon Dioxide (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO_2 comprises over 80 percent of GHG emissions in California.[8]

- Methane (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.[9]

- Nitrous Oxide (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N_2O

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[8] *California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 11.*

[9] *United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003)*

emissions.[10] N_2O emissions from motor vehicles generally occur directly from operation of vehicles.

- Hydrofluorocarbons (HFCs) are one of several high global warning potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.

- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.

- Sulfur Hexafluoride (SF_6) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF_6 are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.[11] As shown on Table IV-7, the other GHGs are less abundant but have higher GWP than CO_2). To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. High GWP gases such as HFCs, PFCs, and SF_6 are the most heat-absorbent.

Table IV-7
Global Warming Potential for Greenhouse Gases

Greenhouse Gas	Global Warming Potential
Carbon Dioxide (CO_2)	1
Methane (CH_4)	28
Nitrous Oxide (N_2O)	265
Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs)	7,000 – 11,000
Sulfur Hexafluoride (SF_6)	23,500

Note: Global warming potential measures how much heat a GHG traps in the atmosphere, in this case, over a 100-year period.
Source: California Air Resources Board, First Update to the Climate Change Scoping Plan. May 2014.

[10] *United States Environmental Protection Agency, U.S. Adipic Acid and Nitric Acid N2O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions, December 2001*

[11] *California Air Resources Board, Climate Change Emission Control Regulations, 2004*

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion, and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the state has developed a strategy to adapt public infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy (Strategy) analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change. The Strategy's key preliminary adaptation recommendations include:

- Appointment of a Climate Adaption Advisory Panel;
- Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020 from 2011 levels;
- Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;
- Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;
- Consideration of climate change impacts for all significant state projects;
- Assessment of climate change impacts on emergency preparedness;
- Identification of key habitats and development of plans to minimize adverse effects from climate change;

- Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;
- Amendment of General Plans and Local Coastal Plans to address climate change impacts and to develop local risk reduction strategies; and
- Inclusion of climate change impact information into fire program planning by state fire fighting agencies.

Regulatory Setting

International

Kyoto Protocol

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States (the "U.S.") joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (the "UNFCCC") agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt.

The Kyoto Protocol (the "Protocol") is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11th session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees

Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to 3 degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020 and acknowledges that $100 billion is needed each year to enable countries to adapt to climate change. The agreement would be signed into law on April 22, 2016 and would require ratification by 55 countries representing 55 percent of emissions.

The Western Regional Climate Action Initiative

The Western Regional Climate Action Initiative (WCI) is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The California Air Resources Board's (ARB) planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

Federal

The United States Environmental Protection Agency (U.S. EPA) has historically not regulated GHGs because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHGs could be considered within the Clean Air Act's definition of a pollutant.[12] In December 2009, U.S. EPA issued an endangerment finding for GHGs under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and U.S. EPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon.

In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding $8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, invests in renewable energy sources, calling for adaptation programs, and leading international efforts to address climate change. In September 2013, U.S. EPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants.

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

Vehicle Standards

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

- On March 30, 2009, the NHTSA issued a final rule for model year 2011.[13]
- On May 7, 2010, the U.S. EPA and the NHTSA issued a final rule regulating fuel efficiency and GHG emissions pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016.[14]
- On August 9, 2011, U.S. EPA and NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal GHG emissions and fuel economy standards for model year 2017-2025 light-duty vehicles.[15]
- NHSTA intends to set standards for model years 2022-2025 in a future rulemaking.[16]
- In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the U.S. EPA and the NHTSA announced fuel economy and GHG emissions standards for medium- and heavy-duty trucks that applies to vehicles from model year 2014–2018.[17]

Energy Independence and Security Act

Among other key measures, the Energy Independence and Security Act (EISA) would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

1) Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.

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[13] *NHSTA. 2009. Average Fuel Economy Standards Passenger Cars and Light Trucks Model Year 2011, Final Rule. 75 Fed. Reg. 25324.*

[14] *U.S. EPA. 2010. Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule. 75 Fed. Reg. 25324.*

[15] *Available: http://www.gpo.gov/fdsys/pkg/FR-2011-08-09/pdf/2011-19905.pdf.*

[16] *NHSTA. 2012. 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards. 77 Fed. Reg. 62624.*

[17] *U.S. EPA Office of Transportation and Air Quality. 2011. EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-Duty Vehicles. Available: http://www.epa.gov/otaq/climate/documents/420f11031.pdf. Accessed November 2011..*

2) Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

3) While superseded by NHTSA and U.S. EPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

State

Assembly Bill 1493

California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 was enacted in September 2003 and requires regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by vehicles used for personal transportation.

Executive Order S-3-05

On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency formed a Climate Action Team that recommended strategies that can be implemented by State agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.[18] Furthermore, the report provided to Governor Schwarzenegger in 2006, referenced above, indicated that smart land use and increased transit availability should be a priority in the State of California.[19] According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-

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[18] *California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.*

[19] *California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.*

use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued an executive order setting a statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the state's GHG targets with those set in October 2014 by the European Union and is intended to help the state meets its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on state agencies to implement measures accordingly and directs ARB to update the Climate Change Scoping Plan.

A recent study shows that the state's existing and proposed regulatory framework will allow the state to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the state to meet the 2030 and 2050 targets.[20]

AB 32

In September 2006, AB 32 was signed into law by Governor Schwarzenegger, focusing on achieving GHG emissions equivalent to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. It mandates that ARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

AB 32 charges ARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, ARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[21] On October 25, 2007, ARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexaflouride emissions from the non-electricity sector. ARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO_2 per year and make up 94 percent of the point source CO_2 emissions in California.

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[20] *Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172).*

[21] *California Air Resources Board, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.*

ARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by ARB in coordination with the Climate Action Team, was first published in October 2008 (the "2008 Scoping Plan"). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state's dependence on oil, diversify the state's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. As required by AB 32, ARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

In order to assess the scope of reductions needed to return to 1990 emissions levels, ARB first estimated the 2020 business-as-usual (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the Scoping Plan, ARB updated the Scoping Plan through a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).[22] CARB updated its 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.[23] Under that scenario, the state would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent).

On May 22, 2014, ARB approved its first update to the AB 32 Scoping Plan, recalculating 1990 GHG emissions using Intergovernmental Panel on Climate Change's (IPCC) Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 $MMTCO_2e$ 1990 emissions level and 2020 GHG emissions limit would be slightly higher than identified in the Scoping Plan, at 431 $MMTCO_2e$. Based on the revised estimates of expected 2020 emissions identified in the

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[22] *California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011.*

[23] *California Air Resources Board, Greenhouse Gas Inventory – 2020 Emissions Forecast, http://www.arb.ca.gov/cc/inventory/data/forecast.htm. Accessed June 2014.*

2011 supplement to the FED and updated 1990 emissions levels identified in the draft first update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 $MMTCO_2e$ (down from 507 $MMTCO_2e$) or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. The ARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors. [24,25]

As shown on Table IV-8, these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the state's cap-and-trade emissions program.

Nearly all reductions are to come from sources that are controlled at the statewide level by state agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the transportation sector, which is charged with reducing 4.5 percent of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

Cap and Trade

The ARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons CO_2e per year must comply with Program requirements. Triggering of the 25,000 metric tons CO_2e per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or "MRR"). The ARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part

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[24] *ARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]*

[25] *ARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.*

(if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

Table IV-8
Emission Reductions Needed to Meet AB 32 Objectives in 2020

Sector	Million Metric Tons of CO_2e Reduction	Percent of Statewide CO_2e Inventory	Summary of Recommended Actions
Energy	-25	-4.9%	Reduce state's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	-23	-4.5%	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy
High Global Warming Potential	-5	-1.0%	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	-2	-0.4%	Eliminate disposal of organic materials at landfills, in-state infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Cap and Trade Reductions	-23	-4.5%	Statewide program that reduces emissions from regulated entities through performance-based targets
Total	-78	-15.3%	

Source: California Environmental Protection Agency, "First Update to the Climate Change Scoping Plan." May 2014.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate.

In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by ARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the state's emissions forecasts and the effectiveness of direct regulatory measures.

As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with the electricity usage of most projects that are subject to CEQA are covered by the Cap-and-Trade Program.

While the 2020 cap would remain in effect post-2020,[26] the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.[27] However, ARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The "recommended action" in the First Update for the Cap-and-Trade Program is: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target."[28] The "expected completion date" for this recommended action is 2017.[29] It is therefore reasonable to assume that the Cap-and-Trade Program will extend beyond 2020.

Senate Bill 1368

Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards also apply to power that is generated outside of California and imported into the state.

SB 97 & CEQA Guidelines

In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor's 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. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;

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[26] *California Health & Safety Code § 38551(a) ("The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.")*

[27] *See AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.*

[28] *ARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 98 (May 2014).*

[29] *Id.*

- Consistency with the ARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the ARB's recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

SB 375

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for ARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. Although SB 375 does not prevent ARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

On October 24, 2008, ARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). ARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO_2e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, ARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as

manufacturing plants, or uses that utilize combustion engines.[30] There is currently no timetable for finalized thresholds.

On September 23, 2010, ARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.[31] For the area under the Southern California Association of Governments' (SCAG) jurisdiction - including the Project area - ARB adopted Regional Targets for reduction of GHG emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the ARB's Executive Officer approved the final targets.[32]

Title 24 Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (the "CCR"), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their

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[30] *California Air Resources Board.* http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf

[31] *California Air Resources Board. Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.* http://www.arb.ca.gov/cc/sb375/notice%20of%20decision.pdf

[32] *ARB. 2011. Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.*

maximum efficiency. The updated 2013 CALGreen Code became effective January 1, 2014 and includes new requirements for additions to existing residential and non-residential development.

Regional

South Coast Air Quality Management District Recommendations for Significance Thresholds

The South Coast Air Quality Management District (SCAQMD) convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of CO_2 equivalent ($MTCO_2e$) as a screening numerical threshold for stationary sources.

The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions which recommended a screening threshold of 3,500 $MTCO_2e$ for residential projects, 1,400 $MTCO_2e$ for commercial projects, and 3,000 $MTCO_2e$ for mixed use projects, additionally the Working Group identified project-level efficiency target of 4.8 $MTCO_2e$ per service population as a 2020 target and 3.0 $MTCO_2e$ per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 $MTCO_2e$ and the plan-level target for 2035 was 4.1 $MTCO_2e$. The SCAQMD has not established a timeline for formal consideration of these thresholds.[33] In the meantime, the project level thresholds are used as a non-binding guide; GHG emissions would be considered potentially significant in the absence of mitigation measures.

The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the Project.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG's adopted its 2012-2035 Regional Transportation Plan Sustainable Communities Strategy (the "RTP/SCS") on April 4, 2012. The RTP/SCS plans to concentrate future development and provide higher intensity development, including residential development, in proximity to transit hubs in order to reduce vehicle miles traveled (VMT) and thereby reduce GHG emissions from personal vehicles. To conduct required modeling analysis for the 2012-2035 RTP/SCS, SCAG distributes the growth forecast to transportation analysis zones (TAZs) to capture localized effects of the interaction of land use and

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[33] *SCAG, Final PEIR for the 2012-2035 RTP/SCS, Appendix G. Accessible at http://rtpscs, scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf*

transportation. The TAZ level maps have been development for the purpose of modeling performance only.[34] The growth and land use assumptions are to be adopted at the jurisdictional level.[35] Further, it is important to note that there is nothing in SB 375 that requires a city's "land use policies and regulations…to be consistent with the regional transportation plan or an alternative planning strategy."[36]

The RTP/SCS also includes an appendix listing examples of measures that could reduce impacts from planning, development and transportation.[37] It notes, however, that the example measures are "not intended to serve as any kind of checklist to be used on a project-specific basis." Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized. Example GHG emissions reduction measures include the following:

- **GHG1**: SCAG member cities and the county governments may adopt and implement Climate Actions Plans (CAPS, also known as Plans for the Reduction of Greenhouse Gas Emissions as described in CEQA Guidelines Section 15183.5 Tiering and Streamlining the Analysis of Greenhouse Gas Emissions).

- **GHG2**: Project sponsors may require Best Available Control Technology (BACT) during construction and operation of projects, including:

    a) Solicit bids that include use of energy and fuel-efficient fleets;

    b) Solicit preference construction bids that use BACT, particularly those seeking to deploy zero- and/or near zero emission technologies;

    c) Employ use of alternative fueled vehicles;

    d) Use lighting systems that are energy efficient, such as LED technology;

    e) Use CEQA Guidelines Appendix F, Energy Conservation, to create an energy conservation plan;

    f) Streamline permitting process to infill, redevelopment, and energy-efficient projects;

    g) Use an adopted emissions calculator to estimate construction-related emissions;

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[34] *SCAG, 2012-2035 Regional Transportation Plan Sustainable Communities Strategy, p. 124.*

[35] *Id.*

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

[37] *SCAG, Final PEIR, 2012-2035 RTP/SCS, Appendix G:* http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf.

h) Use the minimum feasible amount of GHG-emitting construction materials that is feasible;

i) Use of cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;

j) Use of lighter-colored pavement where feasible;

k) Recycle construction debris to maximum extent feasible; and

l) Plant shade trees in or near construction projects where feasible.

- **GHG3**: Local jurisdictions can and may establish a coordinated, creative public outreach activities, including publicizing the importance of reducing GHG emissions and steps community members may take to reduce their individual impacts.

- **GHG4**: Pedestrian and Bicycle Promotion: Local jurisdictions may work with local community groups and business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation.

- **GHG5**: Waste Reduction: Local jurisdictions can and may organize workshops on waste reduction activities for the home or business, such as backyard composting, or office paper recycling, and may schedule recycling drop-off events and neighborhood chipping/mulching days.

- **GHG6**: Water Conservation: Local jurisdictions may organize support and/or sponsor workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, and installing advanced irrigation systems.

- **GHG7**: Energy Efficiency: Local jurisdictions may organize workshops on steps to increase energy efficiency in the home or business, such as weatherizing the home or building envelope, installing smart lighting systems, and how to conduct a self-audit for energy use and efficiency.

- **GHG8**: Schools Programs: Local jurisdictions may develop and implement a program to present information to school children about climate change and ways to reduce GHG emissions, and may support school-based programs for GHG reduction, such as school based trip reduction and the importance of recycling.

Local

In May 2007, the City adopted its Green LA Plan that that sets a goal to reduce the generation of GHG emissions 35 percent below 1990 levels by 2030. Key strategies include increasing the generation of

renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos.

The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.[38] The City's ordinance affects the following types of development:[39]

- New non-residential building or structures of 50,000 gross square feet or more of floor area;
- New mixed-use or residential building of 50,000 gross square feet or more in excess of six stores;
- New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;
- The alteration or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;
- The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.

The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new non-residential buildings, including:

Section 99.04.304.1. Irrigation Controllers. When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
2. 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. Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers that meet the criteria in Section 99.04.304.1.

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

[39] *Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.*

Section 99.04.303.4. Wastewater Reduction. Each building shall reduce by 20 percent wastewater by one of the following methods:

1. The installation of water conserving fixtures (water closets, urinals)

2. Utilizing non-potable water systems (captured rainwater, graywater, and municipally treated wastewater) complying with the current edition of the Los Angeles Plumbing Code or other methods.

Section 99.04.304.2. Outdoor Potable Water. Building on sites with 1,000 square feet or more of cumulative landscaped areas shall have separate meters or submeters for indoor and outdoor potable water use.

Section 99.04.304.3. Irrigation Design. Buildings on sites with 1,000 square feet or more of cumulative irrigated landscaped areas shall have irrigation controllers and sensors which include the following criteria and the manufacturer's recommendations.

Section 99.05.407.1. Weather Protection. Provide a weather-resistant exterior wall and foundation envelope as required by the Los Angeles Building Code section 1403.2 (Weather Protection) and California Energy Code Section 150, manufacturer's installation instructions, or local ordinance, whichever is more stringent.

Section 99.04.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent. Comply with Section 66.32 et seq. of the LAMC.

Section 99.05.408.4. Excavated Soil and Land Clearing Debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project and when approved by the Department, such material may be stockpiled on site until the storage site is developed.

Section 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

Section 99.05.504.3. Covering of Duct Openings and Protection of Mechanical Equipment During Construction. At the time of rough installation, or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheet metal or other methods acceptable to the Department to reduce the amount of dust or debris which may collect in the system.

Section 99.05.504.4.6. Resilient Flooring Systems. For 50 percent of floor area receiving resilient flooring, install resilient flooring complying with the VOC-emission limits defined in the 2009

Collaborative for High Performance Schools criteria and listed on its Low-emitting Materials List or certified under the Resilient Floor Covering Institute FloorScore program.

Los Angeles Green Lodging Program

The Los Angeles Green Lodging Program certifies hotels that implement policies for energy and water conservation, recycling, pollution prevention, and environmentally preferable purchasing; and it actively markets these "green" hotels to meeting planners and tourists.

Existing Emissions

The Project site includes a surface parking lot that serves the adjacent Radisson Hotel to the north and a vacant lot. As such, the Project site does not generate any anthropogenic emissions. To ensure a conservative analysis, no GHG emissions are assumed to be generated at the Project site.

The methodology utilized for the following analysis is based on a Technical Advisory released by the OPR on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.[40] The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."[41] Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the Project. The information provided in this analysis is consistent with the General Reporting Protocol's reporting requirements.

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[40] *California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed March 2, 2015.*

[41] *Ibid.*

The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. These categories consist of the following:

> Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
>
> Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
>
> Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).[42]

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

The ARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to ARB to be considered for future strategies.[43] For example, ARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research has noted that lead agencies "should make a good-faith effort, based on available information, to calculate, model, or estimate... GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[44] Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's California Emissions Estimator Model (CalEEMod). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to

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[42] *Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.*

[43] *California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed March 2, 2015.*

[44] *OPR Technical Advisory, p. 5.*

quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[45]

Threshold of Significance

As discussed below, there are no adopted federal, State, or local thresholds of significance for judging a project's impact on greenhouse gases and climate change. As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. It urges the quantification of GHG emissions where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. It also recommends considering other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). Further, it states that:

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

    a. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

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

    c. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public

[45] *See www.caleemod.com.*

> agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The current CEQA Guidelines do not establish a threshold of significance. Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7[c]). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA Guidelines were amended in response to Senate Bill 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[46] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."[47] Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project compiles with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.[48]

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[46] *Ibid.*

[47] *Ibid. (emphasis added).*

[48] *See, for example, San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA..." Further, the South Coast Air Quality Management District (SCAQMD) has taken this position in CEQA documents it produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold.*

See: SCAQMD, Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2) ; SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks

Although GHG emissions can be quantified, ARB, SCAQMD and the City of Los Angeles, have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.[49] Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[50]

Executive Orders S-3-05 and B-30-15, SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance all apply to the Project and are intended to reduce GHG emissions to meet the statewide targets set in AB 32.

Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's Sustainable Communities Strategy; and
- City of Los Angeles Green Building Ordinance.

Project Impacts

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project site and export haul trips. These impacts would vary day to day over the 18-month duration of construction activities. As illustrated on Table IV-9, construction emissions of CO_2 would peak in 2017, when up to 5,924 pounds of CO_2e per day are anticipated following implementation of recommended Mitigation Measures 3-1 through 3-6 (refer to Checklist Issue 3, Air Quality). These emissions are further incorporated in the assessment of long-term operational impacts by amortizing them over a 30-year period, pursuant to guidance from the state and SCAQMD.

400/700 Upgrade Project, SCH No. 2014121014 (April 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2).

[49] *The South Coast Air Quality Management District formed a GHG Significance Threshold Working Group. Information on this Working Group is available at www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2 .*

[50] *14 CCR § 15064(h)(3).*

Table IV-9
Estimated Construction Emissions (Pounds Per Day)

Construction Year	CO_2	CH_4	N_2O	CO_2e
2017	5,915	<1	0	5,924
2018	1,793	<1	0	1,801
2019	1,754	<1	0	1,762
Source: DKA Planning 2016, based on CalEEMod 2013.2.2				

GHG emissions were calculated for the Project's long-term operations. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

This analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures (i.e., the No Action Taken [NAT] Scenario. This approach mirrors the concepts used in the CARB's *Climate Change Scoping Plan* for the implementation of AB 32. This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The analysis in this section includes potential emissions under NAT scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

The NAT scenario is used to establish a comparison with project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or prescribed mitigation measures. As an example, a NAT scenario would apply a base ITE trip-generation rate for the project and would not consider site-specific benefits resulting from the proposed mix of uses or close proximity to public transportation. The analysis below establishes NAT as complying with the minimum performance level required under Title 24. The NAT scenario also considers State mandates that were already in place when CARB prepared the *Supplemental FED* (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard).

Emissions calculations for the Project include credits or reductions for the regulatory compliance measures and project design features set forth throughout this analysis, such as reductions in energy or

water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project generated trips as a result of project features will provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent.

As shown on Table IV-10, the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 1,690 and 2,518 $MTCO_2e$ per year, respectively, which shows the Project would reduce emissions by 33 percent from the CARB 2020 NAT scenario. The proposed emissions would represent a net 1,690 metric ton increase in annual emissions when accounting for existing emissions from current development. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan.

Table IV-10
Estimated Annual CO_2e GHG Emissions (Metric Tons per Year)

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	<1	<1	-	0%
Energy Sources	829	481	-348	-42%
Mobile Sources	1,611	1,131	-480	-30%
Waste Sources	35	35	-	0%
Water Sources	32	32	-	0%
Construction	11	11	-	0%
Total Emissions	2,518	1,690	-828	-33%
Net Emissions	-	1,690	N/A	N/A

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

** NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

Source: DKA Planning, 2016.

The analysis in this report uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to evaluate the Project's impact (i.e., 15.3 percent reduction from NAT). The report's methodology is to compare the Project's emissions as proposed to the Project's emissions if the Project were built using a

NAT approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if it was constructed with project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate because the Project would contribute to statewide GHG reduction goals. Specifically, the Project site's location in an existing urban setting provides opportunities to reduce transportation-related emissions. It would eliminate many vehicle trips because travel to and from the Project site could be captured by public transit and pedestrian travel instead. For instance, the proposed hotel would utilize a shuttle services to and from the nearby Metrolink and Orange Busway station located on Old Depot Drive. Finally, it would attract existing trips on the street network that would divert to the proposed uses. As such, this analysis concludes that the Project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decisionmaking.

It should be noted that each source category of GHG emissions from the Project would be subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

- Stationary and area sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.
- Transportation. Both construction and operational activities from the Project site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.
- Energy Use. Both construction and operational activities from the Project site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renwable energy sources by December 31, 2030.
- Building structures. Operational efficiences will be built into the project that reduce energy use and waste, as mandated by CALGreen building codes.
- Water and wastewater use. The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.
- Major appliances. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.
- Solid waste management. The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

In addition to the GHG emission reductions described above, it is important to note that the CO_2 estimates from mobile sources (particularly CO_2, CH_4, and N_2O 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 (e.g., commuting, shopping) 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.

Further, the proposed hotel would be certified under the Los Angeles Green Lodging Program, which requires implementation of energy and water conservation measures, pollution prevention, and environmentally preferable purchasing, reducing the hotel's carbon footprint.

As described throughout this analysis, the Project contains numerous regulatory compliance measures and project design features that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. Thus, the Project's emissions reductions as compared to the NAT Scenario demonstrate consistency with GHG Reduction Plans, Executive Orders S-3-05 and B-30-15, SCAG's Sustainable Communities Strategy, and the City of Los Angeles' Green Building Ordinance.

As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant.

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

Less Than Significant Impact. The Project would contribute to cumulative GHG emissions over time in the absence of policy intervention. As noted earlier, the Project would be consistent with a number of relevant plans and policies that govern climate change.

Consistency with Executive Orders S-03-05 and B-30-15.

The Project is consistent with the State's Executive Orders S-3-05 and B-30-15, which are orders from the State's Executive Branch for the purpose of reducing GHG emissions. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is a development located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's emissions profile to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at build-out presented in this analysis represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with the Executive Order's horizon-year goal.

Many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "...for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in CARB's First Update to the AB 32 Scoping Plan.[51,52]

As such, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. Table IV-11 evaluates the Project's consistency with the AB 32 Scoping Plan to determine whether the Project would result in adverse cumulative impacts to global climate change. The Project is consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors.

- **Energy Sector**: Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the Project's emissions level.[53] Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[54]

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[51] *CARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]*

[52] *CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.*

[53] *CARB, First Update, pp. 37-39, 85, May 2014.*

[54] *CARB, First Update, pp. 40-41, May 2014.*

Table IV-11
Project Consistency With AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	Not Applicable. The statewide program is not relevant to the Project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	Not Applicable. The development of standards is not relevant to the Project.
Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	Consistent. The Project would be designed and constructed to meet Cal Green building standards by including several measures designed to reduce energy consumption.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	Consistent. The Project would utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	Not Applicable. The statewide program is not relevant to the Project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	Not Applicable. The development of regional planning goals is not relevant to the Project. The Project site's infill location near several bus routes (i.e., Metro) and Metro's Orange Line stations make it consistent with the smart growth objectives of the region's Sustainable Communities Strategy (SCS). Further, the proposed hotel would utilize a shuttle services to and from the nearby Metrolink and Orange Busway station located on Old Depot Drive.
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	Not Applicable. State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	Not Applicable. State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	Neutral. The Project would not include solar roofs and is not part of the proposed Statewide initiative.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	Not Applicable. State agencies are responsible for implementing efficiency

Table IV-11
Project Consistency With AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
	measures.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	Not Applicable. This measure addresses industrial facilities.
High Speed Rail. Support implementation of a high speed rail system.	Not Applicable. This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	Consistent. The Project would be designed and constructed to meet Cal Green building standards and would include several measures designed to reduce energy consumption.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	Not Applicable. State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	Consistent. The Project is expected to have minimal impact on solid waste facilities.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	Not Applicable. Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. The Project would use water-efficient landscaping.
Agriculture. In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	Not Applicable. The Project would not include agricultural facilities.
Source: DKA Planning, 2016.	

- **Transportation Sector**: Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all would serve to reduce the Project's emissions level.[55]

[55] *CARB, First Update, pp. 55-56, May 2014.*

- **Water Sector**: The Project's emissions level would be reduced as a result of further desired enhancements to water conservation technologies.[56]

- **Waste Management Sector**: Plans to further improve recycling, reuse and reduction of solid waste would beneficially reduce the Project's emissions level.[57]

Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan.

Consistency with SCAG's 2012-2035 RTP/SCS

At the regional level, 2012–2035 RTP/SCS is an applicable plan that defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with 2012–2035 RTP/SCS, this section analyzes the Project's land use profiled for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

Table IV-12 demonstrates the Project's consistency with the Actions and Strategies set forth in the 2012–2035 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2012–2035 RTP/SCS.

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Land Use Actions and Strategies		
Coordinate ongoing visioning efforts to build consensus on growth issues among local governments and stakeholders.	SCAG	Not Applicable. The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. Nonetheless, the City, which is the lead agency for the Project, regularly coordinates with SCAG on regional growth issues.
Provide incentives and technical assistance to local governments to encourage projects and programs that	SCAG	Not Applicable. The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. Nonetheless, the City, which is the lead agency for the Project, regularly coordinates

[56] *CARB, First Update, p. 65, May 2014.*

[57] *CARB, First Update, p. 69, May 2014.*

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
balance the needs of the region.		with SCAG on its advancement of projects and programs that meet regional needs.
Collaborate with local jurisdictions and agencies to acquire a regional fair share housing allocation that reflects existing and future needs.	SCAG Local Jurisdictions HCD	Neutral. The Project does not include housing.
Expand Compass Blueprint program to support member cities in the development of bicycle, pedestrian, Safe Routes to Schools, Safe Routes to Transit, and ADA Transition plans.	SCAG State	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. The Project would not impair SCAG or the State's expansion of the Compass Blueprint program. The network of streets surrounding the Project site provide sidewalks connected to transit stops to promote alternative transportation.
Continue to support, through Compass Blueprint, local jurisdictions and sub-regional COGs adopting neighborhood-oriented development, suburban villages, and revitalized main streets as livability strategies in areas not served by high-quality transit.	SCAG State Local Jurisdictions COGs	Neutral. The Project includes hotel rooms that would bolster the area's hospitality industry. Its impact on supporting neighborhood-oriented development is neutral, though development of hotel rooms in the urban core reduces the demand for such development in areas less able to accommodate such development.
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.	Local Jurisdictions COGs SCAG CTCs	Consistent. While the use of alternatively-fueled vehicles by the Project's tenants and visitors is market driven and beyond the direct control or influence of the Project Applicant, the Project would not impair the City's or SCAG's ability to encourage the use of alternatively-fueled vehicles through various policies and programs.
Continue to support, through Compass	SCAG State	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Blueprint, planning for new mobility modes such as range- limited Neighborhood Electric Vehicles (NEVs) and other alternative fueled vehicles.		action/strategy are SCAG and the State of California. However, as noted above, the Project would not impair any jurisdiction's ability to encourage the use of alternative-fueled vehicles.
Collaborate with the region's public health professionals to enhance how SCAG addresses public health issues in its regional planning, programming, and project development activities.	SCAG State Local Jurisdictions	Neutral. The Project would not impair the City's, SCAG's, or the State's ability to collaborate with the region's public health professionals regarding the integration of public health issues in regional planning. Additionally, the Project would incorporate measures to reduce air emissions and greenhouse gases, minimize hazards, and ensure water quality.
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions SCAG	Consistent. The Project would encourage healthy lifestyles through the provision of bicycle parking spaces.
Seek partnerships with state, regional, and local agencies to acquire funding sources for innovative planning projects.	Local Jurisdictions SCAG State	Neutral. The Project would not impair the City's, SCAG's or the State's ability to seek partnerships in furtherance of funding acquisition.
Update local zoning codes, General Plans, and other regulatory policies to accelerate adoption of land use strategies included in the 2012–2035 RTP/SCS Plan Alternative, or that have been formally adopted by any subregional COG that is consistent with	Local Jurisdictions	Consistent. While not necessarily applicable on a project-specific basis, the Project would support this action/strategy via consistency with SCAG's 2012–2035 RTP/SCS Plan.

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
regional goals.		
Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts.	Local Jurisdictions	Consistent. While not necessarily applicable on a project-specific basis, the Project would support this action/strategy by creating a hotel development comprised of uses that support a balanced range of land uses.
Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance.	Local Jurisdictions SCAG	Consistent. The Project would create a hotel in close proximity to jobs (including those that may be offered on-site), destinations, and other neighborhood services.
Pursue joint development opportunities to encourage the development of housing and mixed-use projects around existing and planned rail stations or along high-frequency bus corridors, in transit-oriented development areas, and in neighborhood-serving commercial areas.	Local Jurisdictions CTCs	Consistent. The Project would accommodate regional growth projected by SCAG in the Los Angeles Planning Area within an infill site that is adjacent to existing, approved, and planned infrastructure, urban services, transportation corridors, transit facilities, and major employment centers in furtherance of SB 375 policies.
Working with local jurisdictions, identify resources that can be used	SCAG Local Jurisdictions	Neutral. The Project includes a hotel that has no direct impact on the housing needs of a growing and increasingly diverse population within the City.

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
for employing strategies to maintain and assist in the development of affordable housing.		
Consider developing healthy community or active design guidelines that promote physical activity and improved health.	Local Jurisdictions	Consistent. As discussed above, the Project would encourage healthy lifestyles through the provision of bicycle parking.
Support projects, programs, policies, and regulations to protect resource areas, such as natural habitats and farmland, from future development.	Local Jurisdictions SCAG	Not Applicable. The Project neither protects nor threatens resource areas from urbanization.
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State SCAG	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. In any event, the Project would be consistent with the overarching goal of SB 375 to reduce vehicle miles traveled and the corresponding emission of GHGs.
Continue partnership with regional agencies to increase availability of state funding for integrated land use and transportation projects in the region.	State SCAG	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. The Project would not impair the ability of SCAG and the State to increase the availability of funding for certain types of projects.
Engage in a strategic planning process to determine the critical components and implementation steps for identifying and addressing open space resources, including increasing and preserving park space, specifically in park-poor communities.	Local Jurisdictions SCAG	Not Applicable. The Project would not impair the ability of the City and SCAG to engage in strategic planning processes to address recreational/park shortages in existing communities.
Identify and map regional priority conservation areas for potential inclusion in future plans.	SCAG	Not Applicable. The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. The Project would not impair SCAG's ability to implement this action/strategy.

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Engage with various partners, including CTCs and local agencies, to determine priority conservation areas and develop an implementable plan.	SCAG CTCs	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to engage with various partners on issues pertaining to conservation areas.
Develop regional mitigation policies or approaches for the 2016 RTP.	SCAG CTCs	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to develop regional mitigation policies or approaches for the future 2016 RTP.
Transportation Network Actions and Strategies		
Perform and support studies with the goal of identifying innovative transportation strategies that enhance mobility and air quality, and determine practical steps to pursue such strategies, while engaging local communities in planning efforts.	SCAG CTCs	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to perform and support various studies.
Cooperate with stakeholders, particularly county transportation commissions and Caltrans, to identify new funding sources and/or increased funding levels for the preservation and maintenance of the existing transportation network.	SCAG CTCs Local Jurisdictions	Not Applicable. This measure does not apply to individual development projects.
Expand the use of transit modes in our subregions such as BRT, rail, limited-stop service, and point-to-point express services utilizing the HOV and HOT lane networks.	SCAG CTCs Local Jurisdictions	Consistent. The Project would not impair the ability of SCAG, the CTCs, or the City to expand and extend the use of other transit modes to the Project Site.
Encourage transit providers	SCAG	Not Applicable. The responsible parties identified in the

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
to increase frequency and span of service in TOD/HQTA and along targeted corridors where cost-effective and where there is latent demand for transit usage.	CTCs	2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to encourage transit provided to increase the frequency and span of service.
Encourage regional and local transit providers to develop rail interface services at Metrolink, Amtrak, and high-speed rail stations.	SCAG CTCs Local Jurisdictions	Consistent. While this action/strategy is not necessarily applicable on a project-specific basis, the Project would not impair the ability of SCAG, CTCs, or the City to encourage rail interface services. Additionally, the proposed hotel would utilize a shuttle services to and from the nearby Metrolink and Orange Busway station located on Old Depot Drive.
Expand the Toolbox Tuesdays program to include bicycle safety design, pedestrian safety design, ADA design, training on how to use available resources that expand understanding of where collisions are happening, and information on available grant opportunities to improve bicycle and pedestrian safety.	SCAG State	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. However, the Project would neither support nor adversely impact the expansion of Toolbox Tuesday opportunities.
Prioritize transportation investments to support compact infill development that includes a mix of land uses, housing options, and open/park space, where appropriate, to maximize the benefits for existing communities, especially vulnerable populations, and to minimize any negative impacts.	SCAG CTCs Local Jurisdictions	Consistent. The Project represents infill development offering a hotel use in close proximity to jobs (including those that may be offered on-site), destinations, and other neighborhood services.
Explore and implement innovative strategies and projects that enhance	SCAG CTCs Local	Consistent. The Project is a bicycle-friendly, hotel development that includes bicycle parking spaces in accordance with LAMC requirements. For instance, the

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles (NEVs) or other alternative fueled vehicles.	Jurisdictions	proposed hotel would utilize a shuttle services to and from the nearby Metrolink and Orange Busway station located on Old Depot Drive.
Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers.	SCAG CTCs Local Jurisdictions	Consistent. The Project includes development of a 105-guest-room hotel on a site that is approximately 0.5 mile from the Metrolink and Orange Busway station located on Old Depot Drive and would provide approximately 50 jobs.
Collaborate with local jurisdictions to provide a network of local community circulators that serve new TOD, HQTAs, and neighborhood commercial centers providing an incentive for residents and employees to make trips on transit.	SCAG CTCs Local Jurisdictions	Not Applicable. As discussed above, the proposed hotel would not include a community circulator. However, it would not impede the City's ability to form such local transit services.
Similar to SCAG's partnership with the City of Los Angeles and LACMTA, offer to all County Transportation Commissions a mutually funded, joint first mile/last mile study for each region.	SCAG CTCs	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. In any event, the Project would not impair SCAG's or the CTCs' ability to offer the mutually-funded study.
Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other ZEV	CTCs Local Jurisdictions	Consistent. The Project would not impair the CTCs' or the City's ability to develop first-mile/last-mile strategies. In support of this action/strategy, the hotel would be located within walking distance of existing and proposed neighborhood commercial centers, both on- and off-site.

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
options.		
Encourage transit fare discounts and local vendor product and service discounts for residents and employees of TOD/HQTAs or for a jurisdiction's local residents in general who have fare media.	Local Jurisdictions	Consistent. The Project would not impair the City's ability to encourage transit fare and other discounts.
Work with transit properties and local jurisdictions to identify and remove barriers to maintaining on-time performance.	SCAG CTCs Local Jurisdictions	Consistent. The Project would not impair the SCAG's, CTCs', or the City's ability to work with transit properties to remove barriers to on-time performance.
Develop policies and prioritize funding for strategies and projects that enhance mobility and air quality.	State	Not Applicable. The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is the State of California.
Work with the California High-Speed Rail Authority and local jurisdictions to plan and develop optimal levels of retail, residential, and employment development that fully take advantage of new travel markets and rail travelers.	State	Not Applicable. The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is the State of California.
Work with state lenders to provide funding for increased transit service in TOD/HQTA in support of reaching SB 375 goals.	SCAG State	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California.
Continue to work with neighboring Metropolitan Planning Organizations to provide alternative modes for interregional travel, including Amtrak and other passenger rail services and an enhanced bikeway network, such as on river	SCAG State	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California.

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
trails.		
Encourage the development of new, short haul, cost-effective transit services such as DASH and demand responsive transit (DRT) in order to both serve and encourage development of compact neighborhood centers.	CTCs Municipal Transit Operators	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are CTCs and Municipal Transit Operators.
Work with the state legislature to seek funding for Complete Streets planning and implementation in support of reaching SB 375 goals.	SCAG State	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California.
Continue to support the California Interregional Blueprint as a plan that links statewide transportation goals and regional transportation and land use goals to produce a unified transportation strategy.	SCAG State	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. Nonetheless, the Project would integrate land use and transportation concerns via development of a hotel in close proximity to the regional roadway network.
Transportation Demand Management (TDM) Actions and Strategies		
Examine major projects and strategies that reduce congestion and emissions and optimize the productivity and overall performance of the transportation system.	SCAG	Not Applicable. The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG.
Develop comprehensive regional active transportation network along with supportive tools and resources that can help jurisdictions plan and prioritize new active transportation projects in their cities.	SCAG CTCs Local Jurisdictions	Consistent. The Project would promote the development of a comprehensive regional active transportation network by locating more potential bicycle and pedestrians that would travel using non-motorized transportation modes.
Encourage the	Local	Not Applicable. While the City would be the

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
implementation of a Complete Streets policy that meets the needs of all users of the streets, roads and highways—including bicyclists, children, persons with disabilities, motorists, neighborhood electric vehicle (NEVs) users, movers of commercial goods, pedestrians, users of public transportation and seniors—for safe and convenient travel in a manner that is suitable to the suburban and urban contexts within the region.	Jurisdictions COGs SCAG CTCs	implementing agency for any Complete Streets project, the Project would neither benefit nor adversely affect the implementation of infrastructure that benefits alternative transportation modes.
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG Local Jurisdictions	Not Applicable. Future employees of the hotel could be encouraged to utilize alternative transportation modes. The inclusion of bicycle parking for future employees or visitors would help promote active transportation modes.
Develop infrastructure plans and educational programs to promote active transportation options and other alternative fueled vehicles, such as neighborhood electric vehicles (NEVs), and consider collaboration with local public health departments, walking/biking coalitions, and/or Safe Routes to School initiatives, which may already have components of such educational programs in place.	Local Jurisdictions	Not Applicable. While local governments are responsible for implementing this, the Project would neither benefit nor adversely impact the City's development of infrastructure and education programs that promote alternative fueled vehicles or other initiatives that reduce congestion and air pollution.
Encourage the development	Local	Not Applicable. While local governments are

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Jurisdictions CTCs	responsible for implementing this, the Project would neither benefit nor adversely impact the City's development of telecommuting programs by employers that reduce congestion and air pollution.
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	State SCAG Local Jurisdictions	Not Applicable. While local governments are responsible for implementing this, the Project would neither benefit nor adversely impact the City's development of active transportation and alternative fuel vehicle programs that promote alternative fueled vehicles or other initiatives that reduce congestion and air pollution.
Transportation System Management (TSM) Actions and Strategies		
Work with relevant state and local transportation authorities to increase the efficiency of the existing transportation system.	SCAG Local Jurisdictions State	Consistent. The Project would not impair the ability of SCAG, the City, or the State to work with transportation authorities to increase the efficiency of the existing transportation system. All improvements would be constructed in accordance with LADOT requirements, as appropriate. Further, the Project would mitigate any significant impacts to local and regional roadways to the extent feasible, as required by CEQA.
Collaborate with local jurisdictions and sub-regional COGs to develop regional policies regarding TSM.	SCAG COGs Local Jurisdictions	Consistent. The Project would not impair the ability of SCAG, the COGs, or the City to collaborate on the development of regional TSM policies. All Project transportation-related improvements would be developed in consultation with LADOT and/or transit service providers, as appropriate, and constructed in compliance with their respective standards.
Contribute to and utilize regional data sources to ensure efficient integration of the transportation system.	SCAG CTCs	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. However, the Project traffic analysis is based on a traffic model developed by LADOT as the primary tool for forecasting traffic volumes within the City of Los Angeles. In addition, SCAG's regional data, including population, housing, and employment forecasts are used where appropriate throughout this analysis.
Provide training opportunities for local jurisdictions on TSM strategies, such as Intelligent Transportation	SCAG Local Jurisdictions	Consistent. While not necessarily applicable on a project-specific basis, the Project would not impair the ability of SCAG or the City to provide TSM strategy training. However, the Project would support transportation system management strategies via the

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Systems (ITS).		provision of appropriate roadway improvements that meet LADOT requirements, as appropriate.
Collaborate with local jurisdictions and sub-regional COGs to continually update the ITS inventory.	SCAG COGS Local Jurisdictions	Consistent. The Project would not impair the ability of SCAG, the COGs, or the City to collaborate on updates to the ITS inventory. See the discussion above regarding the Project's support of transportation system management strategies.
Collaborate with CTCs to regularly update the county and regional ITS architecture.	SCAG CTCs Local Jurisdictions	Consistent. The Project does not impair the ability of SCAG, the CTCs, or the City to collaborate on updates to the ITS architecture.
Collaborate with the state and federal Government and sub-regional COGs to examine potential innovative TDM/TSM strategies.	SCAG State COGs	Not Applicable. The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG, the State of California, and the COGs.
Clean Vehicle Technology Actions and Strategies		
Develop a Regional PEV Readiness Plan with a focus on charge port infrastructure plans to support and promote the introduction of electric and other alternative fuel vehicles in Southern California.	SCAG	Not Applicable. The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG.
Support sub-regional strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emission technologies. The activities committed in the two subregions are put forward as best practices that others can adopt in the future.	SCAG Local Jurisdictions	Consistent. While the acceleration of fleet conversion by the Project's future operators is market driven and beyond the direct control or influence of the Project applicant, the Project would not impair the City's or SCAG's ability to support sub-regional strategies in furtherance of that conversion.

SCAG = Southern California Association of Governments
HCD = California Department of Housing and Community Development
COG = sub-regional council of governments
CTCs = county transportation commissions

Table IV-12
Project Consistency With SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
TOD = transit-oriented development *HQTA = High Quality Transit Area* [a] *"Not Applicable" actions/strategies are those that are not identified for implementation by Local Jurisdictions. The Project's consistency with any actions/strategies identified for implementation by the Local Jurisdictions (i.e., the City of Los Angeles) is assessed above.* *Source: SCAG 2012–2035 RTP/SCS, Chapter 4: Sustainable Communities Strategy, Tables 4.3 through 4.7; April 2012.*		

Consistency with the City of Los Angeles Green Building Ordinance

The Los Angeles Green Building Ordinance requires that all Projects filed on or after January 1, 2014 comply with the Los Angeles Green Building Code as amended to comply with the 2013 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include short and long term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Site, including installing Energy Star rated appliances and installation of water-conserving fixtures. Therefore, the Project is consistent with the Los Angeles Green Building Ordinance.

The Project would comply with the City of Los Angeles' Green Building Ordinance standards that compel LEED certification, reduce emissions beyond a "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development:

The Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level. Projects that are LEED certified generally exceed Title 24 (2013) standards by at least 10 percent.[58] As such, it would incorporate several design elements and programs that would reduce the carbon footprint of the development, including:

1. GHG Emissions Associated with Planning and Design. The Project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles,

[58] *U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 February 26, 2015.*

have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. This would include:

- Reduced parking based on compliance with the City's bicycle parking ordinance.
- Access to several public transportation lines. The site is served by three local bus routes operated by the Los Angeles County Metropolitan Transportation Authority. These include Route 166/36, which operates between Chatsworth station to Sun Valley via Plummer Street, Coldwater Canyon Avenue, and Topanga Canyon Boulevard. It also includes Route 245, which operates between Chatsworth station and Woodland Hills via Topanga Canyon Boulevard. The Metro Orange Line also operates serves from Chatsworth station to North Hollywood station.
- Located near residential neighborhoods. The Project site's proximity to medium- and high-density residential neighborhoods increases the likelihood that more travel to and from the development would be made by non-motorized modes that would reduce potential GHG emissions.

2. GHG Emissions Associated with Energy Demand. The Project must meet Title 24 2013 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This includes:

   - Use of low-emitting paints, adhesives, carpets, coating, and other materials.
   - Equipment and fixtures would comply with the following where applicable:
     - Installed gas-fired space heating equipment would have an Annual Fuel Utilization Ratio of .90 or higher.
     - Installed electric heat pumps would have a Heating Seasonal Performance Factor of 8.0 or higher.
     - Installed cooling equipment would have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
     - Installed tank type water heaters would have an Energy Factor higher than .6.
     - Installed tankless water heaters would have an Energy Factor higher than .80.
     - Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.

- Building lighting in the kitchen and bathrooms within the dwelling units would consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

- An electrical conduit would be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system.

- A minimum of 250 square feet of contiguous unobstructed roof area would be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

- Appliances would meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

3. GHG Emissions Associated with Water Use. The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use. This would include:

   - A schedule of plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building 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 on Table 4.303.2; or

     - A calculation demonstrating a 20 percent reduction in the building "water use" baseline would be provided.

   - When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads would not exceed specified flow rates.

   - When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

- 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).

4. GHG Emissions Associated with Solid Waste Generation. The Project is subject to construction waste reduction of at least 50 percent. In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. GHG Emissions Associated with Environmental Quality. The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:

    - Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.

    - Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the Project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the Project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

Cumulative Impacts

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be

very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as energy, mobile, and construction, would be covered by the Cap-and-Trade Program.

Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; the RTP/SCS and the City of Los Angeles Green Building Ordinance.

Implementation of the Project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from NAT and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the CARB's *Climate Change Scoping Plan* for the implementation of AB 32.

The Project is consistent with the approach outlined in CARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's *Climate Change Scoping Plan*, the Project would use "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen.

As part of SCAG's 2012–2035 SCS/RTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by CARB. The Project results in significant VMT reduction in comparison to NAT and would be consistent with the SCS/RTP.

The Project also would comply with the City of Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's regulatory compliance measures and project design features provided above and throughout this analysis would advance these objectives. Further, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code)

Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures throughout this analysis and project design features to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 33 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

The Project would also be consistent with applicable land use policies of the City of Los Angeles and SCAG's RTP/SCS pertaining to air quality, including reducing GHG emissions.

As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. The NAT comparison and SCAQMD's draft service population target demonstrate the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap-and-Program, that Program would indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program would backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program would be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This would ensure that the GHG reduction targets of AB 32 are met.

Thus, given the Project's consistency with State, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency,

8. HAZARDS AND HAZARDOUS MATERIALS

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

Less Than Significant Impact. The Project includes development of the Project site with hotel, similar to those already found in the Project region (including the hotel located adjacent to the Project site to the north) that would use common types of cleaning products, paint, petroleum products, etc. The Project would not require the transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Therefore, Project impacts related to hazardous materials would be less than significant, and no further analysis of this issue is required.

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

Less Than Significant Impact. Robin Environmental Management (REM) prepared a Phase I Environmental Site Assessment (ESA) of the Project site in May 2011 to provide a professional opinion

regarding the presence of recognized environmental conditions (REC) and other suspect environmental conditions in connection with the Project site (refer to Appendix E). As part of the Phase I ESA, REM conducted a site reconnaissance and a database search. No pits, ponds, swamps, dry wells, or lagoons were observed on the Project site, and no apparent surface staining was observed on the paved/unpaved outdoor areas of the site. The Project site is not listed on any environmental regulatory databases. Based on a government records search, there were three Leaking Underground Storage Tanks (LUST)/Spills Sites (one site with two cases) within 0.25 mile of the Project site that were looked at as potential environmental concern.

- Tosco-76 Station #5200, 21930 Lassen Street, is located at the southeastern corner of Topanga Canyon Boulevard and Lassen Street, approximately 450 feet north-northeast of the Project site. This property is listed in the LUST/Spills databases with an "Open-Site Assessment underway" status.
- Mobil #11-K2Q, 9906 Topanga Canyon Boulevard, is located at the northeastern corner of Topanga Canyon Boulevard and Lassen Street, approximately 550 feet north-northeast of the Project site. This property is listed in the LUST/Spills databases with two cases – one with a "Case Closed (No Further Action Required)" status and another with an "Open-Remediation underway" status.
- LA City Fire Station #96, 21800 Marilla Street, is located approximately 1,000 feet to the east of the Project site. This property is listed in the LUST/Spills databases with a "Case Closed (No Further Action Required)" status.

A summary of the groundwater monitoring results for the Tosco-76 Station shows that first-encountered groundwater occurs at an approximate depth of 40 feet and exhibits a flow direction of generally towards the southeast. All three properties listed above are located in a general groundwater flow cross- or down-gradient direction from the Project site. It is unlikely for environmental concerns potentially derived from the LUSTs to induce significant impact to the subsurface environment of the Project site. REM concluded that no further investigation of the Project site is necessary. For these reasons, the Project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project includes development of the Project site with typical hotel land uses similar to those already found in the Project region that would use common types of cleaning products, paint, petroleum products, etc. The Project would not require the transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Also, there are no schools within one-quarter mile of the Project site. Thus, the Project would not emit hazardous emissions or

handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project is not included on any list compiled pursuant to Government Code Section 65962.5 (refer to Appendix E). Thus, the Project would not create a significant hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project site is not located within two miles of a public airport. The closest airport is the Van Nuys Airport located approximately 9.9 miles southeast of the Project site. Thus, the Project would not result in a safety hazard associated with an airport for people residing or working in the Project area. Therefore, no impacts related to this issue would occur.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Project site is not located within the vicinity of a private airstrip. The closest airport is the Van Nuys Airport located approximately 9.9 miles southeast of the Project site. Thus, the Project would not result in a safety hazard associated with an airport for people residing or working in the Project area. Therefore, no impacts related to this issue would occur.

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

No Impact. No aspects of the Project would inhibit access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports. Further, the Project would comply with all applicable City policies related to disaster preparedness and emergency response. Thus, no impacts related to this issue would occur.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project site is located in an urbanized are of the City and is not subject to wildland fire hazards. Thus, the Project would not expose people or structures to a significant risk of loss, injury or

death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Therefore, no impacts related to this issue would occur.

9. HYDROLOGY AND WATER QUALITY

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

Less Than Significant Impact. Construction of the Project would result in ground surface disturbance during site clearance, excavation, and grading, which could affect the quality of runoff at the Project site should a storm event occur during the Project's construction phase. However, the Project developer would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, construction activities would be performed in accordance with the requirements of the Los Angeles Building Code and the LARWQCB through the City's Stormwater Management Division. The Project developer would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. All onsite grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, and conditions imposed by the City of Los Angeles Department of Building and Safety's Soils Report Approval Letter date, which will be issued during the entitlements/permitting process. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Additionally, during the Project's operational phase, most of the Project site would be developed with impervious surface, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Thus, no significant impacts related to water quality would occur as a result of the Project.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop

to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. The 1.95-acre Project site is located in an urbanized area of the City, much of which is developed with thousands of acres of impervious surfaces, such as roadways, parking lots, and buildings. During storm events, most of the runoff in these areas is directed toward the City's storm drain system, which discharges the storm water to nearby lakes, rivers, and/or the ocean. Although the Project site is partially undeveloped, the site is not a significant source of groundwater recharge, given its relatively small size compared to the greater developed area surrounding the site and the depth to groundwater at the Project site (approximately 35-40 feet below ground surface). The Project would include surficial grading only and would not reach groundwater depth. Additionally, all water consumption associated with the Project would be supplied by the Metropolitan Water District (MWD) and not from groundwater beneath the Project site. Thus, the Project would have no affect on groundwater supplies or recharge, and no impacts related to this issue would occur.

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

Less Than Significant Impact. During the Project's construction phase, the Project developer would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Project developer would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion and siltation during the construction phase. Additionally, during the Project's operational phase, most of the Project site would be developed with impervious surface, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Thus, no significant impacts related to erosion and siltation would occur as a result of Project operation.

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

Less Than Significant Impact. The Project site is currently partially developed with impervious surfaces. During storm events, the stormwater from the Project site flows to the local streets where the runoff enters the City's storm drain system. The Project would increase the amount of impervious surface at the Project site by developing the western portion of the Project site (which is currently undeveloped) with a surface parking lot. The Project developer would be required to implement BMPs (pursuant to SUSMP regulations) and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not exceed the capacity of the existing or planned drainage system. Therefore, Project impacts related to storm drain capacity would be less than significant.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. Regarding storm drain impacts, refer to response to Checklist Question 9d. Impacts related to water quality are discussed in response to Checklist Question 9f.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. To address water quality during the Project's construction phase, the Project Developer would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, Project construction impacts related to water quality would be less than significant.

During the Project's construction phase, in accordance with the City's Low Impact Development (LID) Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the Project would meet the City's water quality standards. Therefore, Project impacts related to operational water quality would be less than significant.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The Project site is not located within a 100-year flood hazard area. Thus, the Project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project site is not located within a 100-year flood hazard area. Thus, the Project would not place within a 100-year flood hazard area structures that would impede or redirect flood flows. Therefore, no impacts related to this issue would occur.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. The Project site is not located in any area susceptible to floods associated with a levee or dam. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, and no impacts related to this issue would occur.

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

No Impact. The Project site is not in an area susceptible to seiches, tsunamis, or mudflows. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. The Project site is currently partially developed with a surface parking lot, and the remaining portion is a vacant lot. The Project site located in an urbanized area surrounded by hotel, multiple-family, and single-family land uses to the north, south, and west. Additionally, the Project site fronts on and has access to Topanga Canyon Boulevard, a Boulevard II in the Chatsworth community of the City. Thus, the Project would not physically divide an established community. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations associated with development of the Project site. Therefore, Project impacts related to land use and planning would be less than significant.

Regulatory Framework

Regional Plans

Southern California Association of Governments

The Southern California Association of Governments (SCAG) functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

Compass Blueprint Growth Vision Report/Compass Blueprint 2% Strategy Areas

The Compass Blueprint Growth Vision Report/Compass Blueprint 2% Strategy (the "Compass Blueprint Report"), adopted by SCAG as part of its June 2004 Southern California Compass Growth Vision Report, is an implementing mechanism for the regional growth strategies outlined in the SCAG's 1996 Regional Comprehensive Plan and Guide (the "RCPG"). The Compass Blueprint Report is intended to provide a strategy to accommodate the projected 24 million residents expected to live in the region by 2035, while balancing valuable quality of life goals. The Compass Blueprint Report emphasizes focusing growth in existing and emerging centers and along major transportation corridors, creating significant areas of

mixed-use development and walkable communities, targeting growth around existing and planned transit stations, and preserving existing open space and stable residential areas.

Four principles were established for the Compass Blueprint Report that are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. It is SCAG's intention that decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies are also provided as a way to achieve each of the principles, as summarized below.

- *Principle 1. Improve mobility for all residents.* Strategies to support Principle 1 include: (1) encourage transportation investments and land use decisions that are mutually supportive; (2) locate new housing near existing jobs and new jobs near existing housing; (3) encourage transit-oriented development; and (4) promote a variety of travel choices.

- *Principle 2. Foster livability in all communities.* Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote "people scaled," pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.

- *Principle 3. Enable prosperity for all people.* Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.

- *Principle 4. Promote sustainability for future generations.* Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and (d) utilize "green" development techniques.

The Compass Blueprint Report is a guideline for how and where the Growth Vision can be implemented. It calls for moderate changes to current land use and transportation trends in two percent of the land area of the region, known as the 2% Strategy Opportunity Areas. These areas are defined as having a high potential to implement projects, plans, and/or policies consistent with the Compass Blueprint Report principles that would result in the greatest progress towards economic, mobility, livability and sustainability benefits to local neighborhoods.

Regional Comprehensive Plan

SCAG has also prepared the 2008 Regional Comprehensive Plan (the "2008 RCP") in response to SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing,

traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the Compass Growth Vision Report and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced the RCPG for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the Regional Transportation Plan (the "RTP") (discussed below) and the Compass Blueprint Report.

2012-2035 Regional Transportation Plan/Sustainable Communities Strategy

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for the CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035. For the area under the SCAG jurisdiction, including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035. On February 15, 2011, CARB's Executive Officer approved the final targets.

On April 4, 2012, the Regional Council of SCAG adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (the "2012-2035 RTP/SCS"). For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region's residents and visitors. While mobility is a vital component of the quality of life that this region deserves, it is by no means the

only component. SCAG has placed a greater emphasis than ever before on sustainability and integrated planning in the 2012–2035 RTP/SCS, whose vision encompasses three principles that collectively work as the key to the region's future: mobility, economy, and sustainability.

The 2012–2035 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS) as set forth by the Federal Clean Air Act. As such, the 2012–2035 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2023–2035 time frame and clear steps to move toward this objective. This is especially critical for the goods movement system. The development of a world-class, zero- or near-zero-emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The 2012–2035 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, GHG reduction, and economic development.

For the first time, the 2012–2035 RTP/SCS includes a significant consideration of the economic impacts and opportunities provided by the transportation infrastructure plan set forth in the 2012–2035 RTP/SCS, considering not only the economic and job creation impacts of the direct investment in transportation infrastructure, but also the efficiency gains in terms of worker and business economic productivity and goods movement. The 2012–2035 RTP/SCS outlines a transportation infrastructure investment strategy that will benefit Southern California, the state, and the nation in terms of economic development, competitive advantage, and overall competitiveness in the global economy in terms of attracting and retaining employers in the Southern California region.

The 2012–2035 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its 22 million residents by 2035. More importantly, the RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and array of open spaces for future generations.

The 2012-2035 RTP/SCS also includes an appendix listing examples of measures that could reduce impacts from planning, development, and transportation. It notes, however, that the example measures are "not intended to serve as any kind of checklist to be used on a project-specific basis." Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

South Coast Air Quality Management District

Air Quality Management Plan

The Project is also located within the South Coast Air Basin (the "Basin") and is, therefore, within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

Air quality impacts of the Project and consistency of the Project with the AQMP are discussed in response to Checklist Question 3a of this IS/MND.

Los Angeles County Metropolitan Transportation Authority

Congestion Management Plan

The Congestion Management Plan (CMP) for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects, which are eligible to compete for state gas tax funds. Within Los Angeles, the Los Angeles County Metropolitan Transportation Authority (Metro) is the designated congestion management agency responsible for coordinating the CMP.

The Project's potential impacts with respect to the CMP are discussed in response to Checklist Question 16b of this IS/MND.

Local Plans

City of Los Angeles

City of Los Angeles General Plan

The City of Los Angeles General Plan (the "General Plan"), adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements. The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the citywide elements. The citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation, and provides guidance for future updates to the various elements of the General Plan, but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans.

Chatsworth-Porter Ranch Community Plan

The Chatsworth-Porter Ranch Community Plan has been designed to accommodate the anticipated growth in population and employment of the Community to the year 2010. The Plan does not seek to promote or to hinder growth; rather it accepts the likelihood that growth will take place and must be provided for. The Plan encourages the preservation of low-density single-family residential areas, the conservation of open space lands, and the preservation and strengthening of the Chatsworth Community Business District. Much of the Chatsworth-Porter Ranch Community is hillside and mountainous terrain and as much of the remaining undeveloped lands as feasible is to be preserved for open space and recreational uses.

The northwest border of the City includes a wildlife migration corridor. The wildlife corridor through the Simi Hills and Santa Susana Mountains to the Santa Monica Mountains could be endangered by development and transportation arteries cutting through this vital link. The Plan encourages preservation by both public and private agencies of this critical natural feature. Within the Plan area, the Simi Freeway presents the most difficult barrier to wildlife. While there are several passes both under and over the freeway, they are predominately used by automobile traffic that presents a danger to wildlife. Culverts should be under the freeway west of Topanga Canyon Boulevard, constructed for wildlife and equestrians, and connected to trails.

The Chatsworth-Porter Ranch Community is contiguous to unincorporated Los Angeles County lands to its north and west, most of which remain vacant. It is imperative that the development of these lands be compatible with that of Chatsworth-Porter Ranch, as proposed in this Plan, particularly with respect to land uses, circulation and open space, and their impact on drainage and sewerage. To help ensure compatible development of these lands, the County area north of the Simi Freeway to the Oat Mountain ridgeline should be considered for annexation. (Map Footnote No. 11)

The existing land use designations for the Project site are Community Commercial and Low 1 Residential (refer to Figure II-4 in Section II, Project Description).

City of Los Angeles Planning and Zoning Code

All development activity in the City, including the Project site, is subject to the LAMC, particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (the "Zoning Code"). The Zoning Code includes development standards for the various districts in the City. As shown on Figure II-5 (refer to Section II, Project Description), The Project site is zoned [Q]C2-1 (Qualified Condition, Commercial Zone, Height District 1) and RA-1 (Suburban Zone, Height District 1).

Project Impacts

Compass Blueprint Report

The Project's consistency with the Compass Blueprint Report is discussed on Table IV-13. As discussed, the Project would be consistent with applicable land use policies of the Compass Blueprint Report, and Project impacts related to inconsistency with this report would be less than significant.

Table IV-13
Project Consistency with Applicable Policies of the Compass Blueprint Report

Policy	Project Consistency
Locate new housing near existing jobs and new jobs near existing housing.	**Consistent.** The Project includes development of a 105-guest-room hotel (a source of employment) on Topanga Canyon Boulevard, adjacent to multi-family and single-family residential land uses
Encourage transportation investments and land use decisions that are mutually supportive.	**Consistent.** The Project would take advantage of existing and proposed transportation investments by developing the Project site with hotel land uses that are planned for by the existing zoning and land use designations for the Project site.
Support the preservation of stable single-family neighborhoods.	**Consistent.** The western portion of the Project site abuts a single-family residential neighborhood on the north and west. This portion of the Project site would

Table IV-13
Project Consistency with Applicable Policies of the Compass Blueprint Report

Policy	Project Consistency
	be developed with a surface parking lot, separating the hotel (which would be developed in the eastern portion of the Project site on Topanga Canyon Boulevard) from the single-family neighborhood.
Focus development in urban centers and existing cities.	**Consistent.** The Project includes development of hotel land uses along Topanga Canyon Boulevard, a roadway that is already developed with various commercial land uses and sources of employment.
Utilize "green" development techniques.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (the "LAGBC"), which is designed to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint. Additionally, the proposed hotel would be certified under the Los Angeles Green Lodging Program, which requires implementation of energy and water conservation measures, pollution prevention, and environmentally preferable purchasing, reducing the hotel's carbon footprint.
Develop strategies to accommodate growth that use resources efficiently, and minimize pollution and greenhouse gas emissions.	**Consistent.** As discussed previously in the IS/MND, the Project would result in a reduction of GHG emissions as compared to the NAT scenario. Additionally, the proposed hotel would be certified under the Los Angeles Green Lodging Program, which requires implementation of energy and water conservation measures, pollution prevention, and environmentally preferable purchasing, reducing the hotel's carbon footprint.
Source: Southern California Association of Governments, Southern California Compass Blueprint 2% Strategy, Southern California Compass Blueprint Growth Vision Report, June 2004.	

2008 RCP

A discussion of the Project's consistency with the relevant policies of the 2008 RCP is presented on Table IV-14. As discussed, the Project would be consistent with all of the applicable 2008 RCP policies, and no significant impacts related to inconsistency with the 2008 RCP would occur.

Table IV-14
Project Consistency with the 2008 RCP

Policies	Consistency Discussion
Land Use and Housing	
LU-6.2 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features. The Project would also be consistent with the City of Los Angeles Building Code, including the LAGBC, which is designed to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint. Additionally, the proposed hotel would be certified under the Los Angeles Green Lodging Program, which requires implementation of energy and water conservation measures, pollution prevention, and environmentally preferable purchasing, reducing the hotel's carbon footprint.
Open Space and Habitat	
OSC-11 Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	**Consistent.** The Project would incorporate sustainable building practices to eliminate pollution and reduce waste. As described above, the Project would comply with the CalGreen requirements of the California Building Code and the LAGBC. Additionally, the proposed hotel would be certified under the Los Angeles Green Lodging Program, which requires implementation of energy and water conservation measures, pollution prevention, and environmentally preferable purchasing, reducing the hotel's carbon footprint.
OSC-12 Developers and local governments should promote water-efficient land use and development.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and the LAGBC, which is designed to reduce the Project's energy and water use. This would include the use of drought tolerant landscaping and water efficient fixtures and plumbing.
OSC-14 Developers and local governments should implement mitigation for open space impacts through the following activities: • Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands,	**Consistent.** The Project includes development of a hotel land use on land that is designated for such land uses, and is consistent with other commercial development along Topanga Boulevard. The Project would avoid significant impacts to regionally significant open space resources.

Table IV-14
Project Consistency with the 2008 RCP

Policies	Consistency Discussion
community open space, and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements. • Project sponsors should fully mitigate direct and indirect impacts to open space resulting from implementation of regionally significant impacts.	
Water	
WA-9 Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporate green and conservation features. The Project would also be consistent with the City of Los Angeles Building Code, including the LAGBC, which is designed to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint.
WA-11 Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure impacts.	**Consistent.** The Project would be required to conform with LADWP that the capacity of the existing water infrastructure could supply the domestic needs of the Project during the construction and operation phases. The Project Applicant would be required to construct any upgrade to the water infrastructure serving the Project site that is needed to accommodate the Project's water consumption needs.
WA-12 Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing water related pricing incentives.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporate green and conservation features. The Project would also be consistent with the City of Los Angeles Building Code, including the LAGBC, which is designed to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint.
WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code, for water and energy conservation, and with the LAGBC, which is designed to reduce the

Table IV-14
Project Consistency with the 2008 RCP

Policies	Consistency Discussion
	Project's energy and water use, reduce waste, and reduce the carbon footprint. Additionally, the proposed hotel would be certified under the Los Angeles Green Lodging Program, which requires implementation of energy and water conservation measures, pollution prevention, and environmentally preferable purchasing, reducing the hotel's carbon footprint.
Energy	
EN-10 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include: • Using energy efficient materials in building design, construction, rehabilitation, and retrofit. • Encouraging new development to exceed Title 24 energy efficiency requirements. • Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. • Utilizing efficient commercial/residential space and water heaters: This could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c+Projects.pr_tax_credits. • Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, which allow communities to generate their own electricity. • Orienting streets and buildings for best solar access. • Encouraging buildings to obtain at least 20% of their	**Consistent.** The Project would meet/exceed Title 24 standards through compliance with the LAGBC. Additionally, the proposed hotel would be certified under the Los Angeles Green Lodging Program, which requires implementation of energy and water conservation measures, pollution prevention, and environmentally preferable purchasing, reducing the hotel's carbon footprint.

Table IV-14
Project Consistency with the 2008 RCP

Policies	Consistency Discussion
electric load from renewable energy.	
EN-12 Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.	**Consistent.** As required by the City, the roof of the proposed hotel building would be designed to accommodate solar panels. Also, the Project would receive electricity supply from LADWP, which obtains a portion of its electricity supplies from renewable sources.
Solid Waste	
SW-14 Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include: • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap materials through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). • Reuse of existing building structure and shell in renovation projects. Building lifetime waste reduction measures that should be explored for new and remodeled buildings include: • Development of indoor recycling program and space. • Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting, and other reusable components.	**Consistent.** The Project would participate in a demolition and construction waste recycling program as well as an operational recycling program.

Source: Southern California Association of Governments, Regional Comprehensive Plan, October 2008.

2012-2035 RTP/SCS

The Project's consistency with the applicable goals of the 2012-2035 RTP/SCS is discussed on Table IV-15. As discussed, the Project would be consistent with the 2012-2035 RTP/SCS. Therefore, impacts related to inconsistency with the 2012-2035 RTP/SCS would be less than significant.

Table IV-15
Project Consistency with the 2012-2035 RTP/SCS

Goal	Consistency Discussion
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	**Consistent.** The Project includes development of 105-guest-room hotel (approximately 0.5 mile from the Chatsworth Metrolink Station) and a site that is zoned and designated for such use by the City that would serve an area currently developed with commercial and residential land uses. Also, the Project includes 16 bicycle parking spaces.
Actively encourage and create incentives for energy efficiency, where possible.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project would exceed Title 24 standards with compliance with the City's Green Building Ordinance and the Project would also be consistent with the City of Los Angeles Building Code, including the LAGBC, which is designed to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint. Additionally, the proposed hotel would be certified under the Los Angeles Green Lodging Program, which requires implementation of energy and water conservation measures, pollution prevention, and environmentally preferable purchasing, reducing the hotel's carbon footprint.
Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	**Consistent.** The Project includes development of 105-guest-room hotel (approximately 0.5 mile from the Chatsworth Metrolink Station) and a site that is zoned and designated for such use by the City that would serve an area currently developed with commercial and residential land uses. Also, the Project includes 16 bicycle parking spaces.
Source: Southern California Association of Governments, Regional Transportation Plan/Sustainable Communities Strategy, April 2012.	

General Plan (Framework Element)

The Project's consistency with the General Plan Framework Element land use policies is discussed on Table IV-16. As shown, the Project would be consistent with many of the applicable policies, and Project impacts related to inconsistency of the Project with the General Plan Framework Element would be less than significant.

Table IV-16
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
Framework Element: Land Use Chapter	
3.2.1 Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.	**Consistent.** The Project includes development of 105-guest-room hotel (approximately 0.5 mile from the Chatsworth Metrolink Station) and a site that is zoned and designated for such use by the City that would serve an area currently developed with commercial and residential land uses. Also, the Project includes 16 bicycle parking spaces.
3.2.2 Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.	**Consistent.** The Project includes development of 105-guest-room hotel (approximately 0.5 mile from the Chatsworth Metrolink Station) and a site that is zoned and designated for such use by the City that would serve an area currently developed with commercial and residential land uses. Also, the Project includes 16 bicycle parking spaces.
3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The Project includes development of 105-guest-room hotel (approximately 0.5 mile from the Chatsworth Metrolink Station) and a site that is zoned and designated for such use by the City that would serve an area currently developed with commercial and residential land uses. Also, the Project includes 16 bicycle parking spaces.
3.2.4 Provide for the siting and design of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	**Consistent.** The Project includes development of 105-guest-room hotel along Topanga Canyon Boulevard that is developed with a mix of commercial and residential land uses, including a multi-family residential building directly south of the Project site. The architecture, design, and massing of the proposed hotel would be similar to that of the existing multi-family residential building adjacent to the south and to that of the existing hotel that is located directly north of the Project site. Also, the western portion of the Project site would be developed with a surface parking

Table IV-16
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
	lot that would not intrude onto the existing single-family residential neighborhood located north and west of the Project site.
3.7.4 Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 *Urban Form and Neighborhood Design* Chapter of this Element.	**Consistent.** The Project would be required to comply with all current and applicable design standards.

Source: City of Los Angeles General Plan.

Commercial Citywide Design Guidelines

Consistency of the Project with the Commercial Citywide Design Guidelines is discussed on Table IV-17. As discussed, the Project would be consistent with all applicable standards of the Commercial Citywide Design Guidelines. As such, the Project would not result in any inconsistencies with the Plan. Therefore, Project impacts related to inconsistency with the Commercial Citywide Design Guidelines would be less than significant.

Table IV-17
Project Consistency with the Applicable Standards of the Commercial Citywide Design Guidelines

Standard	Project Consistency
Objective 1 ***Consider Neighborhood Context and Linkages In Building and Site Design***	
Site Planning	
1. Create a strong street wall by locating building frontages at the required setback or, where no setback requirement exists, at the front property line. Where additional setback is necessary or a prevailing setback exists, activate the area with a courtyard or "outdoor room" adjacent to the street by incorporating pedestrian amenities such as plazas with seating or water features, for example.	**Consistent.** The Project would comply with the setback requirements for the Project site.
2. Provide direct paths of travel for pedestrian destinations within large developments. Especially near transit lines, create primary entrances for pedestrians that are safe, easily accessible, and a short distance from transit stops.	**Consistent.** Although the Project is not a large development, the Project would include walkways and signage to direct hotel users to the hotel entrance.
5. Activate mid-block passageways, pedestrian walkways, or paseos using water features, pedestrian-level lighting, murals or artwork, benches, landscaping, or special paving so that they are safe and visually	**Consistent.** The Project would provide landscaping along Topanga Canyon Boulevard.

Table IV-17
Project Consistency with the Applicable Standards of the Commercial Citywide Design Guidelines

Standard	Project Consistency
interesting spaces.	
7. Place public use areas such as restaurant seating, reception and waiting areas, lobbies, and retail, along street-facing walls where they are visible to passersby.	**Consistent.** The hotel entrance and lobby would be visible from Topanga Canyon Boulevard, near the entry driveway.
8. Place drive-thru elements away from primary site corners and adjacent primary streets.	**Consistent.** The hotel drop-off zone would be located approximately 100 feet from property lines.
10. Install bicycle racks and lockers, especially in multi-tenant commercial or mixed-use buildings located on Major or Secondary highways where bike routes are existing or planned. Ensure bicycle racks are placed in a safe, convenient, and well-lit location to encourage alternative modes of transport for employees and consumers with small purchases.	**Consistent.** The Project would comply with all of the City's bicycle parking requirements.
Entrances	
1. Provide a logical sequence of entry and arrival as part of the site's design. Special entry treatments such as stamped or colored concrete and special planting and signage can be used to enhance entries and guide pedestrians.	**Consistent.** The entry driveway to the hotel would direct users to the hotel entrance, which would be designed with architectural treatments, landscaping and signage to guide pedestrians.
2. Entries should be designed according to simple and harmonious proportions in relationship to the overall size and scale of the building. Ensure that pedestrian entries provide shelter year-round.	**Consistent.** The hotel entry would be proportionate to the hotel and would provide year-round shelter.
3. Ensure that the main entrance and entry approach can accommodate persons of all mobility levels.	**Consistent.** The Project would comply with all Americans with Disabilities Act (ADA) requirements.
4. Promote pedestrian activity by placing entrances at grade level and unobstructed from view from the public right-of-way. Avoid sunken entryways below street level. Where stairs are located near the main entrance, highly visible and attractive stairs should be placed in a common area such as an atrium or lobby and integrated with the predominant architectural design elements of the main building.	**Consistent.** The Project's entrance would be at grade level.
7. Install electronic security to avoid the need for unsightly security grills and bars. If such security measures are necessary, ensure that security grills and bars recess completely into pockets at the side or top of storefronts so as to conceal the grills when they are retracted.	**Consistent.** The Project would include electronic security.
Relationship to Adjacent Buildings	
1. Ensure that new buildings are compatible in scale, massing, style, and/or architectural materials with existing structures in the surrounding neighborhood. In	**Consistent.** As discussed in response to Checklist Question 3(c), the Project site is located in an urbanized area of Los Angeles.

Table IV-17
Project Consistency with the Applicable Standards of the Commercial Citywide Design Guidelines

Standard	Project Consistency
older neighborhoods, new developments should likewise respect the character of existing buildings with regards to height, scale, style, and architectural materials.	The eastern portion of the Project site is currently developed with an L-shaped parking lot that serves the existing four-story Radisson Hotel located directly north of the Project site. The southern boundary of the Project site runs adjacent to an existing four-story multi-family residential building. The western portion of the Project site is undeveloped but is surrounded by existing development including the multi-family residential building to the south and single-family residential development to the west and north. Other development in the immediate Project site area include commercial uses along (north and south) Topanga Canyon Boulevard, manufacturing/warehouse uses to the east, and primarily single-family residential development to the west and southwest, with the exception of the multi-family residential building located just to the south of the Project site. The Project includes development of the Project site with a four-story hotel and surface parking. The height and architecture of the proposed hotel would be similar to that of the existing hotel located just to the north of the Project site and the height of the multi-family residential structure located to the south of the Project site. The currently undeveloped portion of the Project site would be developed with surface parking and would maintain an "open" character.
2. Soften transitions between commercial districts and immediately surrounding residential neighborhoods with respect to building height, massing, and negative impacts of light and noise. Plant trees, shrubs, or vines to grow between property lines.	**Consistent.** The hotel building would be set along Topanga Canyon Boulevard, away from the single-family neighborhood to the north of the Project site. The hotel's landscaped parking lot would further buffer the hotel building from nearby residential uses.

Table IV-17
Project Consistency with the Applicable Standards of the Commercial Citywide Design Guidelines

Standard	Project Consistency
3. Where commercial or multi-family projects are adjacent to single-family zones, provide a sensitive transition by maintaining a height compatible with adjacent residential buildings. Mitigate negative shade/shadow and privacy impacts by stepping back upper floors and avoiding direct views into neighboring single-family yards.	**Consistent.** The hotel building would be set along Topanga Canyon Boulevard, away from the single-family neighborhood to the north of the Project site. The hotel's landscaped parking lot would further buffer the hotel building from nearby residential uses.
4. In pedestrian-oriented commercial areas with predominantly smaller storefronts (especially when a project is built over two or more lots), apply vertical breaks and pedestrian-scaled storefront bays to prevent monolithic "box-like" buildings and maintain a storefront rhythm consistent with surrounding buildings.	**Consistent.** The Project would incorporate pedestrian-scaled architectural features at ground level and setbacks in the building massing to create rhythm.
Objective 2 ***Employ High Quality Architecture to Define the Character of Commercial Districts***	
Pedestrian Scale	
1. Maintain a human scale rather than a monolithic or monumental scale. High-rise buildings in particular should take care to address pedestrian scale at the ground floor.	**Consistent.** The Project would incorporate pedestrian-scaled architectural features at ground level and setbacks in the building massing to create rhythm.
2. At entrances and windows, include overhead architectural features such as awnings, canopies, trellises, or cornice treatments that provide shade and reduce daytime heat gain, especially on south-facing facades.	**Consistent.** The entrance to the hotel would include an awning.
3. Differentiate the ground floor from upper floors. Changes in massing and architectural relief add visual interest and help to diminish the perceived height of buildings.	**Consistent.** Architectural features and window would be used to differentiate the floors of the hotel.
Building Façade and Form	
1. Vary and articulate the building façade to add scale and avoid large monotonous walls.	**Consistent.** The hotel building would include variations and articulation to break up the hotel massing.
2. Architectural elements such as entries, porticoes, cornices, and awnings should be compatible in scale with the building massing and should not be exaggerated or made to appear as a caricature of an historic architectural style.	**Consistent.** The hotel's entryway would be pedestrian scaled.
3. Layer building architectural features to emphasize certain features of the building such as entries, corners, and the organization of retail or office spaces.	**Consistent.** Varying building materials and architecture features would be incorporated into the hotel to differentiate the hotel's entrance.
4. Incorporate and alternate different textures, colors, materials, and distinctive architectural treatments that add visual interest while avoiding dull and repetitive façades.	**Consistent.** Varying textures, colors, building materials, and architectural treatments would be incorporated into the design of the Project.

Table IV-17
Project Consistency with the Applicable Standards of the Commercial Citywide Design Guidelines

Standard	Project Consistency
5. Incorporate windows and doors with well designed trims and details as character-defining features to reflect an architectural style or theme consistent with other façade elements.	**Consistent.** The Project would incorporate windows and doors with well-designed trims and details as character-defining features to reflect an architectural style or theme consistent with other façade elements.
6. Treat all façades of the building with an equal level of detail, articulation, and architectural rigor.	**Consistent.** The Project would treat all façades of the building with an equal level of detail, articulation, and architectural rigor.
7. Integrate varied roof lines through the use of sloping roofs, modulated building heights, stepbacks, or innovative architectural solutions.	**Consistent.** The Project would integrate varied rooflines through the use of sloping roofs, modulated building heights, stepbacks, or innovative architectural solutions.
8. Reinforce existing facade rhythm along the street where it exists by using architectural elements such as trim, material changes, paved walkways, and other design treatments consistent with surrounding buildings.	**Consistent.** The Project would reinforce existing facade rhythm along the street where it exists by using architectural elements such as trim, material changes, paved walkways, and other design treatments consistent with surrounding buildings.
Building Materials	
1. Approach character-defining details in a manner that is true to a style of architecture or common theme.	**Consistent.** The Project would incorporate a common architectural theme.
2. Apply trim, metal- and woodwork, lighting, and other details in a harmonious manner, consistent with the proportions and scale of the building(s).	**Consistent.** The Project would incorporate trim, metal- and woodwork, lighting, and other details in a harmonious manner, consistent with the proportions and scale of the hotel building.
3. Select building materials, such as architectural details and finishes that convey a sense of permanence. Quality materials should be used to withstand the test of time regardless of architectural style.	**Consistent.** The Project would incorporate appropriate architectural details and finishes.
4. Apply changes in material purposefully and in a manner corresponding to variations in building mass.	**Consistent.** The Project would incorporate changes in material purposefully and in a manner corresponding to variations in building mass.
5. Use white or reflective paint on rooftops and light paving materials to reflect heat away from buildings and reduce the need for mechanical cooling.	**Consistent.** The Project would use appropriate roofing and pavement materials.
6. Use exterior surface materials that will reduce the incidence and appearance of graffiti.	**Consistent.** The Project would incorporate exterior surface materials that will reduce the incidence and appearance of graffiti.
7. Fences should incorporate changes in materials, texture, and/or landscaping to avoid solid, uninterrupted walls. Avoid materials such as chain link, wrought iron spears, and cyclone.	**Consistent.** Any Project fencing would include changes in materials, texture, and/or landscaping to avoid solid, uninterrupted walls.
8. Utilize landscaping to add texture and visual interest at	**Consistent.** The Project would incorporate

Table IV-17
Project Consistency with the Applicable Standards of the Commercial Citywide Design Guidelines

Standard	Project Consistency
the street level. Where limited space is available between the building and the public right-of-way, incorporate climbing vegetation as a screening method.	landscaping at the street level.
Objective 3 ***Augment the Streetscape Environment with Pedestrian Amenities***	
Sidewalks	
5. Plant street trees at the minimum spacing permitted by the Division of Urban Forestry, typically one tree for every 20 feet of street frontage, to create a consistent rhythm. Broadleaf evergreen and deciduous trees should be used to maintain a continuous tree canopy. Shade producing street trees may be interspersed with an occasional non-shade tree.	**Consistent.** The Project would comply with the City's landscaping and street tree requirements.
8. Provide path lighting on sidewalks to encourage and extend safe pedestrian activities into the evening.	**Consistent.** The Project would comply with the City's lighting requirements.
Crosswalks/Street Crossings for Large-Scale Developments	
1. Incorporate features such as white markings, signage, and lighting so that pedestrian crossings are visible to moving vehicles during the day and at night.	**Consistent.** The Project would incorporate pedestrian pathways and crossings that are visible day and night.
Objective 4 ***Minimize the Appearance of Driveways and Parking Areas***	
Off-Street Parking and Driveways	
1. Place on-site parking to the side or rear of buildings so that parking does not dominate the streetscape.	**Consistent.** The Project's parking lot would be located to the side of the hotel building.
2. Maintain continuity of the sidewalk by minimizing the number of curb cuts for driveways and utilizing alleys for access and egress. Where alleys do not exist, concentrate curb cuts at side streets or mid-block.	**Consistent.** The Project would maintain the existing sidewalk along Topanga Canyon Boulevard and would not require any new curb cuts.
3. Where alternatives to surface parking are not feasible, locate parking lots at the interior of the block, rather than at corner locations. Reserve corner locations for buildings.	**Consistent.** The Project's parking lot would be located within the interior of the Project site block.
4. Where the parking lot abuts a public sidewalk, provide a visual screen or landscaped buffer between the sidewalk and the parking lot.	**Consistent.** The Project would provide visual screening/landscaping of the parking lot from the adjacent sidewalk.
8. Mitigate the impact of parking visible to the street with the use of planting and landscaped walls tall enough to screen headlights.	**Consistent.** The Project would incorporate landscaping/walls to screen headlights in the Project's parking lot.
9. Illuminate all parking areas and pedestrian walkways to improve safety. Avoid unintended spillover impacts onto adjacent properties.	**Consistent.** The Project would comply with the City's lighting requirements.
10. Use architectural features, such as decorative gates and fences, in combination with landscaping to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk or building	**Consistent.** The Project would use architectural features and landscaping to provide continuity at the street where openings would occur due to the driveway or

Table IV-17
Project Consistency with the Applicable Standards of the Commercial Citywide Design Guidelines

Standard	Project Consistency
wall.	other breaks in the sidewalk or building wall.
Objective 5 ***Include Open Space to Create Opportunities for Public Gathering***	
On-Site Landscaping	
1. Retain mature and healthy vegetation and trees when developing a site, especially native species.	**Consistent.** Eleven trees are located on the Project site, including three protected coast live oak trees and eight non-protected trees (one Mexican fan palm, one California pepper, two queen palms, and four windmill palms) (refer to the Tree Reports in Appendix A). Two of the protected trees would be protected in place; one protected tree would be removed as part of the Project. All of the non-protected trees would be removed as part of the Project's construction phase. However, as required by the City and as outlined in Mitigation Measures 1-1 and 1-2, all removed protected trees shall be replaced on the Project site at a 4:1 ratio, and all removed non-protected trees shall be replaced at a 1:1 ratio (respectively), subject to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works review and approval prior to implementation of the mitigation measures.
2. Design landscaping to be architecturally integrated with the building and suitable to the functions of the space while selecting plant materials that complement the architectural style, uses, and form of the building.	**Consistent.** The Project's landscaping would be architecturally integrated with the building and suitable to the functions of the space, and the proposed plant materials would complement the architectural style, uses, and form of the hotel building.
3. Design open areas to maintain a balance of landscaping and paved area.	**Consistent.** Open areas would be designed to maintain a balance of landscaping and paved area.
4. Select drought tolerant, native landscaping to limit irrigation needs and conserve water. Mediterranean and local, climate-friendly plants may be used alongside native species.	**Consistent.** The Project's landscaping would meet the City's requirements.
5. Facilitate sustainable water use by using automated watering systems and drip irrigation to irrigate landscaped areas.	**Consistent.** The Project would use a automated water system and drip irrigation.
6. Facilitate stormwater capture, retention, and infiltration, and prevent runoff by using permeable or porous paving materials in lieu of concrete or asphalt. Collect, store, and reuse stormwater for landscape	**Consistent.** The Project would facilitate stormwater capture, retention, and infiltration, and prevent runoff by using permeable or porous paving materials in lieu

Table IV-17
Project Consistency with the Applicable Standards of the Commercial Citywide Design Guidelines

Standard	Project Consistency
irrigation.	of concrete or asphalt.
7. Provide canopy trees in planting areas in addition to street trees for shade and energy efficiency, especially on south and southwest facing façades.	**Consistent.** The Project would meet the City's landscaping requirements, including trees.
Open Space and Plazas	
2. Orient open spaces to the sun and views. Create a sense of enclosure while maintaining safety, so that open spaces and plazas feel like outdoor rooms.	**Consistent.** The Project's open space areas would have access to the sun and views and would be enclosed with fencing for safety.
5. Landscape all open areas not used for buildings, driveways, parking, recreational facilities, or pedestrian amenities. Landscaping may include any practicable combination of shrubs, trees, ground cover, minimal lawns, planter boxes, flowers, or fountains that reduce dust and other pollutants and promote outdoor activities, especially for children and seniors.	**Consistent.** The Project would meet the City's landscaping requirements.
Objective 6 ***Improve the Streetscape by Reducing Visual Clutter***	
Building Signage Placement	
1. In general, a maximum of one business identification wall sign should be installed per business frontage on a public street. Rarely should more than one business identification wall sign be utilized per storefront.	**Consistent.** The Project would meet the City's signage requirements.
2. Locate signs where architectural features or details suggest a location, size, or shape for the sign. Place signs so they do not dominate or obscure the architectural elements of the building or window areas.	**Consistent.** The Project would meet the City's signage requirements.
3. Include signage at a height and of a size that is visible to pedestrians and facilitates access to the building entrance.	**Consistent.** The Project would meet the City's signage requirements.
Building Signage Materials	
2. Limit the total number of colors used in any one sign. Small accents of several colors make a sign unique and attractive, but competition of many different colors reduces readability.	**Consistent.** The Project would meet the City's signage requirements.
3. Limit text on signs to convey the business name or logo. Eliminate words that do not contribute to the basic message of the sign.	**Consistent.** The Project would meet the City's signage requirements.
4. Select sign materials that are durable and compatible with the design of the façade on which they are placed.	**Consistent.** The Project would meet the City's signage requirements.
5. Illuminate signs only to the minimum level required for nighttime readability.	**Consistent.** The Project would meet the City's signage requirements.
Lighting and Security	

Table IV-17
Project Consistency with the Applicable Standards of the Commercial Citywide Design Guidelines

Standard	Project Consistency
1. Use ornamental lighting to highlight pedestrian paths and entrances to contribute to providing for a comfortable nighttime strolling experience while providing security by including after-hours lighting for storefronts.	**Consistent.** The Project would meet the City's lighting and security requirements.
2. Install lighting fixtures to accent and complement architectural details. Shielded wall sconces and angled uplighting can be used at night to establish a façade pattern and animate a building's architectural features.	**Consistent.** The Project would meet the City's lighting and security requirements.
3. Utilize adequate, uniform, and glare-free lighting, such as dark-sky compliant fixtures, to avoid uneven light distribution, harsh shadows, and light spillage onto adjacent properties.	**Consistent.** The Project would meet the City's lighting and security requirements.
Utilities	
1. Place utilities in landscaped areas and out of the line-of-sight from crosswalks or sidewalks. Utilities such as power lines, transformers, and wireless facilities should be placed underground or on rooftops when appropriately screened by a parapet; otherwise, any mechanical or electrical equipment should be buffered by planting materials in a manner that contributes to the quality of the existing landscaping on the property and the public streetscape.	**Consistent.** The Project would meet the City's utility placement requirements.
2. Screen views of rooftop equipment such as air conditioning units, mechanical equipment, and vents from view from the public right-of-way.	**Consistent.** The Project would meet the City's requirements for screening mechanical equipment.
3. Hide trash enclosures within parking garages so that they are not visible to passersby. Screen outdoor stand alone trash enclosures using walls consistent with the architectural character of the main building, and locate them so that they are out of the line-of-sight from crosswalks or sidewalks.	**Consistent.** The Project would meet the City's requirement for screening trash receptacles.
Source: Commercial Citywide Design Guidelines, 2011.	

Chatsworth-Porter Ranch Community Plan

Consistency of the Project with the Chatsworth-Porter Ranch Community Plan is discussed on Table IV-18. As discussed, the Project would be consistent with all applicable policies of the Chatsworth-Porter Ranch Community Plan. As such, the Project would not result in any inconsistencies with the Plan. Therefore, Project impacts related to inconsistency with the Chatsworth-Porter Ranch Community Plan would be less than significant.

Table IV-18
Project Consistency with Applicable Policies/Programs of the Chatsworth-Porter Ranch Community Plan

Policy/Program	Project Consistency
Land Use	
The commercial lands (not including associated parking) designated by this Plan to serve suburban residential areas in this Plan are adequate to meet the needs of the projected population to the year 2010, as computed by the following standards: 1. 0.6 acres per 1,000 residents for commercial uses for neighborhood or convenience-type commercial areas; 2. 0.2 acres per 1,000 residents for commercial uses for community shopping and business districts, including service uses and specialized commercial uses. Without effective transportation demand management strategies, such as carpool and vanpool or transit, off-street parking should be provided at a ratio of one parking space per 300 gross square feet of building. Surface parking areas shall be located between commercial and residential uses, where appropriate, to provide a buffer, and shall be separated from residential uses by means of a wall and/or landscaped setback.	**Consistent.** The Project includes development of a 105-guest-room hotel on a site that is zoned and designated in the Chatsworth Community Plan for such use. The Project would include a surface parking lot in the western portion of the Project site, buffering the existing residential land uses located to the north, south, and west of the Project site from the proposed hotel building. The amount of parking provided by the Project would comply with LAMC parking requirements (refer to Table IV-18 later in this section).
Circulation	
Highways and Local Streets shown on the Plan shall be developed in accordance with the standards and criteria contained in the Highways and Freeways Element of the General Plan and the City's Standard Street Dimensions. Design characteristics which give street identity such as curves, changes in direction and topographical differences should be emphasized by street trees and planted median strips and by paving. Streets, highways and freeways, when developed, should be designed and improved in harmony with adjacent development and to facilitate driver and passenger orientation. Adequate highway improvements shall be assured prior to the approval of zoning permitting intensification of land use in order to avoid	**Consistent.** The Project would not include the development of any new roadways. All ingress/egress and emergency access associated with the Project would be designed and constructed in accordance with Building and Safety, Los Angeles Fire Department (LAFD), and LAMC requirements.

Table IV-18
Project Consistency with Applicable Policies/Programs of the Chatsworth-Porter Ranch Community Plan

Policy/Program	Project Consistency
congestion and assure proper development.	
Service Systems	
The proposed facilities shown in this Plan are to be developed in accordance with the standards for need, site area, design and location as expressed in the Service Systems Element of the General Plan. (See individual technical elements for specific standards.) Such development should be sequenced and timed to provide a workable, efficient, and adequate balance between land use and service facilities at all times. The full residential, commercial and industrial densities and intensities proposed by the Plan are predicated upon the provision of adequate public service facilities, with reference to the standards contained in the General Plan. No increase in density shall be affected by zone change or subdivision unless it is determined that such facilities are adequate to serve the proposed development.	**Consistent.** As discussed in response to Checklist Topic 14, Public Services and Checklist Topic 17, Utilities and Service Systems, existing public and utility services serving the Project site are adequate to serve the Project.
Public Improvements	
Circulation To facilitate local traffic circulation, relieve congestion, and provide mobility for all citizens, the following are required: 1. Continued development of the highway and street system in conformance with existing traffic improvement programs; 2. Continued improvements to the public transportation system serving the Community; and 3. Monitoring of traffic mitigation measures for projects approved by discretionary review.	**Consistent:** As discussed in response to Checklist Question 16a, with implementation of Mitigation Measure 16-1, Project impacts related to transportation/traffic would be less than significant.

Table IV-18
Project Consistency with Applicable Policies/Programs of the Chatsworth-Porter Ranch Community Plan

Policy/Program	Project Consistency
Other Public Facilities 2. Underground Utilities Where feasible, powerlines in new development should be placed underground. The Department of Water and Power should accelerate the program for placing existing powerlines underground.	**Consistent:** All utilities associated with the Project would be placed underground.
Source: Chatsworth-Porter Ranch Community Plan, 1993.	

Devonshire/Topanga Corridor Specific Plan

Consistency of the Project with the Devonshire/Topanga Corridor Specific Plan is discussed on Table IV-19. As discussed, the Project would be consistent with all applicable regulations of the Devonshire/Topanga Corridor Specific Plan. As such, the Project would not result in any inconsistencies with the Specific Plan. Therefore, Project impacts related to inconsistency with the Devonshire/Topanga Corridor Specific Plan Plan would be less than significant.

Table IV-19
Project Consistency with Applicable Regulations of the Devonshire/Topanga Corridor Specific Plan

Regulation	Project Consistency
Land Use	
All land uses in the Specific Plan area shall be consistent with the land use designations in the Chatsworth-Porter Ranch Community Plan and with the additional regulations in this Specific Plan.	**Consistent.** The Project includes development of hotel land uses that allowed under the existing land use designation for the Project site.
Height Limit	
No building or structure located in whole or in part within the Specific Plan area shall exceed a maximum of 45 feet in height.	**Consistent.** The Project building height would be 44 feet and 7 inches.
Lot Coverage	
Buildings and structures shall cover no more than 50 percent of the lot. This restriction shall apply to the erection or construction of new buildings or structures, and the addition to any existing building or structure within the Specific Plan area. **Exception:** If at least 15 percent of the lot is reserved for and permanently maintained as landscaped Open Space, and if surface parking areas and driveways do not exceed 20 percent of the lot, then up to 65 percent of the lot may be covered by buildings and structures.	**Consistent.** The Project would comply with this regulation.

Table IV-19
Project Consistency with Applicable Regulations of the Devonshire/Topanga Corridor Specific Plan

Regulation	Project Consistency
Lots that are zoned for commercial uses and with a Height District designation of 2D shall be allowed a maximum floor area ratio of 1.5 to 1.	
Buffering	
A solid decorative masonry wall, a minimum six feet in height, shall be constructed along the property line of any commercially zoned lot if its parking or driveway area is adjacent to a single-family residentially zoned or used lot. The wall shall be constructed along the property line adjacent to the residential lot. There shall be no openings, except for a lockable gate for landscape maintenance work and as may be required by the LAMC. Decorative masonry walls shall mean split-face, slump stone, plaster, brick or stone facing with a top cap. Both sides of the wall must be decorative. The above requirements shall not apply to a property line bordering a single-family lot, if a wall already exists along that property line or a commercially zoned lot which is separated from single-family zone or used lots by streets, alleys or other public ways.	**Consistent:** The Project would comply with this regulation.
Setbacks	
Every lot within the Specific Plan area shall maintain a landscaped setback of at least five feet from Devonshire Street and Topanga Canyon Boulevard. This setback may include no more than 150 square feet of driveways and walkways. For lots over 100 feet in width, additional driveways and walkways not exceeding a total of 300 square feet shall be permitted. A minimum of 50 percent of this landscaped setback shall be in vegetation.	**Consistent:** The Project would comply with this regulation.
Landscape Maintenance Standard	
A. Parking Lots. It shall be the responsibility of the property owner to maintain all landscape features located on private property, including, but not limited to, plant material, signs, walkways, benches, fountains, etc., in accordance with the following criteria: at least ten percent of the total area of an open parking lot shall be landscaped; at least half of the landscaped area shall be with shade-producing trees at a ratio of one tree for every four parking spaces. These trees shall be 24-inch box size and be at least 10 feet tall at the time of planting. B. Maintenance 1. All features (benches, fountains, etc.) shall be	**Consistent.** The Project would comply with this regulation.

Table IV-19
Project Consistency with Applicable Regulations of the
Devonshire/Topanga Corridor Specific Plan

Regulation	Project Consistency
maintained in a condition as near as possible to the original state when installed. 2. All landscaped areas shall be equipped with an automatic sprinkler or drip irrigation system designed to conserve water. All vegetation shall be maintained in a first-class condition at all times.	
Driveway Review	
Prior to the issuance of building permits for the erection, construction or Extensive Remodeling of any building or structure within the Specific Plan area, access driveway plans shall be submitted to, and approved by, the Department of Transportation and the Bureau of Engineering. Any plans relating to access to any commercially-zoned lot in the Specific Plan area shall be subject to the review and approval of the District Office of the Bureau of Engineering and Department of Transportation. This review shall also include a determination by the Department of Transportation, pursuant to LAMC Section 80.14 relating to left-turn movements either entering or exiting commercially-zoned properties.	**Consistent.** The Project would comply with this regulation.
Signs	
A. General Sign Provisions and Prohibitions 1. The Department of Building and Safety shall not issue a permit for a sign unless it complies with this Section. All signs shall comply with the provisions of LAMC Chapter IX, Article 1, Division 62. 2. The following signs and sign types are prohibited in the Specific Plan area: a. Projecting signs; b. Flashing signs; c. Rotating Signs; d. Banner signs; e. Temporary signs. B. The combined sign area of all permanent on-site signs facing a street shall not exceed two square feet for each one foot of linear street frontage of the lot. C. Pole Signs. All on-site pole signs in the Specific Plan area shall conform to the following: 1. The overall height of a pole sign shall not exceed	**Consistent.** The Project would comply with this regulation.

Table IV-19
Project Consistency with Applicable Regulations of the Devonshire/Topanga Corridor Specific Plan

Regulation	Project Consistency
15 feet for every 25 feet of linear street frontage in excess of 50 feet and shall not exceed a maximum height of 30 feet. 2. The area of a pole sign, as viewed from any one direction, shall not exceed 75 square feet plus 15 square feet for each additional business over five businesses identified on an individual pole sign. However, in no event shall the total area of the pole sign exceed 150 square feet. 3. The sign face of any pole sign shall be contained in one continuous area. D. Off-Site Signs. All off-site signs in the Specific Plan area shall conform to the following: 1. Existing legally-erected off-site signs may be relocated, provided that the new location otherwise meets all requirements of Division 62 relating to off-site signs. 2. With the exception of Paragraph 1 above, no new off-site sign shall be erected within the Devonshire/Topanga Specific Plan area. E. Amortization 1. All temporary signs which are made nonconforming by this Section shall be completely removed within 90 days from the effective date of this Specific Plan. 2. If a nonconforming sign is damaged or partially destroyed by fire, flood, earthquake or other natural disaster to the extent of more than 50 percent of its replacement value at the time of the damage or destruction, repair of the damage or destruction involves more than sign face replacement and the sign has not been repaired within 30 days of the date of the damage or destruction, then the damaged sign shall be totally removed within 45 days of the date of the damage or destruction. 3. Ninety days after the cessation of a business activity, service, or product whose sign was lawfully erected, any related signs shall be removed, or the face or the sign shall be removed and replaced with blank panels or shall be painted out. This provision shall not apply to a sign which	

Table IV-19
Project Consistency with Applicable Regulations of the
Devonshire/Topanga Corridor Specific Plan

Regulation	Project Consistency
qualifies as an "advertising display" as defined in Section 5202 of the California Business and Professions Code.	
Screening	
All roof-mounted, pole-mounted, or free-standing equipment, i.e., mechanical, electronic, solar and/or ductwork on any building above the roof ridge or parapet wall, whichever is higher, shall be screened from the horizontal view of residentially zoned or used properties, and from the street with materials compatible with the design of the building.	**Consistent.** The Project would comply with this regulation.
Underground Utilities	
Where available, new construction shall make provisions in the design phase to provide connections for public utilities underground	**Consistent.** The Project would comply with this regulation.
Lighting	
A. All exterior light fixtures shall be shielded to minimize illumination of adjacent properties and to reduce glare. Flood-lighting of buildings shall be prohibited. All exterior lighting, except for purposes of safety, security, and to illuminate signs and existing billboards, shall be turned off at the end of business hours. B. Off-street parking areas shall be lighted with lights having an illumination of not less than 2.0 foot candles averaged over the entire parking area.	**Consistent.** The Project would comply with this regulation.
Design Guidelines and Design Elements for Buildings and Landscaping	
Volume Building volumes should feature a dominance of smooth stucco surfaces with traditional projections and recessions. **Wall Surfaces** Wall surfaces should to convey a structure of stone, brick or adobe through suggestion of thickness (mass). Stucco is the preferred surface cover; adobe and stone are also encouraged where such surface material is compatible with the design of the building. Stucco surfaces are to be treated in a flat manner to create a relatively smooth tactile surface, suggestive of a masonry structure behind. **Colors** Colors for wall surfaces should not be harsh, glaring, or bright. White and ivory are the preferred colors.	**Consistent.** The Project requires a Project Permit Compliance pursuant to LAMC Section 11.5.7C to determine whether the Project is in compliance with applicable regulations of the Devonshire/Topanga Corridor Specific Plan and pursuant to Section 16.C of the Specific Plan for Design Review, including these design guidelines.

Table IV-19
Project Consistency with Applicable Regulations of the Devonshire/Topanga Corridor Specific Plan

Regulation	Project Consistency
Trim colors, including ironwork, should be dark. **Roofs** Simple low pitched gable and shed roofs are preferred. All flat roofs should be surrounded by a parapet which is of a height which will hide any rooftop equipment. Red cap and pan tile is the preferred roofing material. Projecting cupolas, towers, and varied chimney forms are encouraged; in many cases such roof projections can be used to house ventilation and other rooftop equipment. **Ground Surfaces** The surfaces should be broken up into appropriately scaled geometric patterns which are related to the design of the building. Brick, tile, and stone are the preferred surface materials. Where concrete is used, it should be appropriately colored and textured. **Windows and Doors** Openings should be designed to suggest the thickness of traditional masonry wall surfaces. Doors and windows should be recessed away from the outer wall surfaces. Materials used for door and window frames, and for door and window mullions, are to be of wood or traditional metal, such as iron. Untreated or anodized aluminum is not appropriate. Glass areas should be broken up by mullions so that their scale is compatible with the building. Windows may be covered externally with appropriately designed metal grilles. Untreated or anodized aluminum is not appropriate. **Arches** Full arches of appropriate scale are preferred to segmented or pointed arches. Generally, arches should spring from traditionally detailed columns, piers or pilasters. Careful consideration should be given to the wall	

Table IV-19
Project Consistency with Applicable Regulations of the
Devonshire/Topanga Corridor Specific Plan

Regulation	Project Consistency
surface above the arch, so that sufficient wall surface is present between the key of the arch and the next architectural element above. **Other Elements** The following elements may be incorporated into exterior design. These elements should be scaled and treated in a traditional design manner: lintels columns, piers and pilasters cornices and entablatures paseos arcades and loggias balconies exterior staircases metal work, such as wrought iron lanterns and sign brackets awnings	
Source: Devonshire/Topanga Corridor Specific Plan, September 7, 1993.	

Zoning Code

The Project site is zoned [Q]C2-1 (Qualified Condition, Commercial Zone, Height District 1) and RA-1 (Suburban Zone, Height District 1) (refer to Figure II-5 in Section II, Project Description). The Project includes a Zone Change pursuant to LAMC Section 12.32F for the portion of the Project currently zoned [Q]C2-1 Zone to C2-1 Zone. Additionally, the Project includes a Conditional Use Approval pursuant to LAMC Section 12.24B to permit a Hotel within 500-feet of an R Zone, as permitted by LAMC Section 12.24W.24, and to permit a "public parking area" in the RA-1 Zone as permitted by LAMC Section 12.24W.37. The Project would comply with all regulations associated with the proposed zoning and conditional use approval. Therefore, the Project would not result in any significant impacts related to the Zoning Code.

Height

The Project site is currently within Height District 1, which limits height to 45 feet. However, LAMC Section 12.21.Q.10 limits building height within 50-99 feet of an RS-1 Zone to 33 feet. Property to the north of the Project site is zoned RS-1. The proposed hotel would be 45 feet tall and thus, the Project includes a Variance pursuant to LAMC Section 12.27 to permit a building height of 45 feet in lieu of a permitted 33-foot building height. Through approval of the variance, the Project would not conflict with the LAMC height requirements for the site.

FAR

The portion of the Project site that is zoned for commercial uses allows development of the site with a 1.5:1 FAR. With a buildable area of approximately 41,379 square feet, this area could be developed with up to 62,068 square feet. The Project includes development of 57,497 square feet or an FAR of approximately 1.4:1. Thus, the Project would not exceed the FAR requirements for the site, and no impacts related to FAR would occur.

Vehicle Parking

LAMC vehicle parking requirements for the Project are shown on Table IV-20. As shown, the Project would be required to provide 124 vehicle parking spaces. The Project includes 127 vehicle parking spaces, exceeding the LAMC requirements by 3 spaces. Therefore, the Project complies with LAMC vehicle parking requirements.

Table IV-20
Project Parking

Land Use	LAMC Parking Requirement[1]	Parking Spaces Required
105 hotel rooms	1 space/room (first 30 rooms)	30 spaces
	1 space/2 rooms (next 30 rooms)	15 spaces
	1 space/3 rooms (in excess of 60 rooms [45 rooms])	15 spaces
	Subtotal	*60 spaces*
	Less bicycle parking reduction[2]	*-4 spaces*
	Radisson Hotel Covenant Parking	*68 spaces*
	Total Parking Required	*124 spaces*
	Total Parking Provided	**127 spaces**

[1] *LAMC Section 12.21 A.4(b)*
[2] *Per LAMC Section 12.21A.4, ...new or existing automobile parking spaces required by code for all uses may be replaced by bicycle parking at a ratio of one automobile parking space for every four bicycle parking spaces provided. Refer to Table IV-18.*

Bicycle Parking

LAMC bicycle parking requirements for the Project are shown on Table IV-21. As shown, the Project would be required to provide 12 bicycle parking spaces. The Project includes 16 bicycle parking spaces, meeting/exceeding the LAMC requirements by 4 spaces. Therefore, the Project complies with LAMC bicycle parking requirements.

Table IV-21
Project Bicycle Parking

Land Use	LAMC Bicycle Parking Requirement[1]	Bicycle Parking Spaces Required
105 hotel rooms	Long-term: 1 space/20 rooms Short-term: 1 space/20 rooms	6 spaces[2] 6 spaces[2]
	Total Bicycle Parking Required	*12 spaces*
	Total Bicycle Parking Provided	**16 spaces (8 short-term, 8 long-term)**

1 *LAMC Section 12.21 A.16(a)(2)*
2 *5.25 spaces rounded up to 6 spaces.*

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The Project site is not subject to any applicable habitat conservation plan or natural community conservation plan. Therefore, the Project would not conflict with any applicable habitat conservation plan or natural community conservation plan, and impacts related to this issue would occur.

11. MINERAL RESOURCES

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project site is located in an urbanized part of the City. There are no known mineral resources on the Project site or in the vicinity. The Project site has not been identified by the City as being located in an oil field or within an oil drilling area. Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impacts related to issue would occur.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The Project site is located in an urbanized part of the City. The Project site is not identified as a mineral resource recovery site. Thus, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impacts related to issue would occur.

12. NOISE

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated. The noise modeling results are included in Appendix B.

Characteristics of Sound

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table IV-22 provides examples of A-weighted noise levels from common sources.

Table IV-22
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35
Source: United States Occupational Safety & Health Administration, Noise and Hearing Conversation Technical Manual, 1999.	

Noise Definitions

Community Noise Equivalent Level (CNEL): CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.

Equivalent Noise Level (L_{eq}). L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Effects of Noise

The degree to which noise can impact the environment ranges from levels that interfere with speech and sleep to levels that cause adverse health effects. Human response to noise is subjective and can vary from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes

Small perceptible changes in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and would likely cause some community reaction. A 10-dBA increase is heard as a doubling in loudness and would cause a community response.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of the distance.

Noise is most audible when traveling by direct line-of-sight.[59] Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver can greatly reduce noise levels from the source since sound can only reach the receiver by diffraction. Sound barriers can reduce sound levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

[59] *Line-of-sight is a visual path between the noise source and the noise receptor.*

REGULATORY SETTING

Federal

Noise Standards

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project, which is a private development in the City. With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise.

State

Noise Standards

The California Department of Health Services (the "DHS") has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines for land use and noise exposure compatibility are shown on Table IV-23. In addition, Section 65302(f) of the California Government Code requires each county and city in the state to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

City

The LAMC provides two types of noise standards that are relevant to this analysis: 1) construction noise standards, and 2) general noise ordinance standards. The construction noise standards apply only to construction activities, while the general noise ordinance standards apply to noise generated by land use activities.

Table IV-23
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] *Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.*
[b] *Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.*
[c] *Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.*
[d] *Clearly Unacceptable: New construction or development should generally not be undertaken.*

Source: Office of Planning and Research, State of California Genera Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Construction Noise Standards

The City of Los Angeles Municipal Code (LAMC) establishes noise regulations for both short-term construction activities and long-term project operations. The LAMC limits noise from any powered equipment or powered hand tool in a residential zone (or within 500 feet) at a distance of 50 feet between 7:00 a.m. and 10:00 p.m. to:

- 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines,

off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

- 75 dBA for powered equipment of 20 horse-power or less intended for infrequent use in residential areas; including chain saws, log chippers and powered hand tools; and
- 65 dBA for powered equipment intended for repetitive use in residential areas; including lawn mowers, backpack blowers, small lawn and garden tools.[60]

However, these noise limits do not apply where compliance is deemed technically infeasible. Specifically, such activities are allowed when it can be demonstrated that compliance is not possible "despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment."[61]

Section 41.40 of the LAMC prohibits construction activity from occurring between 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturday.[62] This is intended to protect persons occupying sleeping quarters in any hotel, apartment, or other place of residence. Construction noise intruding onto property zoned for manufacturing or industrial uses is exempt from these standards.

The City released the *L.A. CEQA Thresholds Guide* in 2006 to provide further guidance determining the significance of noise impacts. According to the Guide, a project's construction noise levels would, under normal circumstances, have a significant impact if:

- Construction activities lasting more than one day exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three-month period exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.[63]

Additionally, a project would, under normal circumstances, have a significant impact on community noise levels if:

- The Project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable"

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60 *City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.05), 1986.*

61 *Ibid.*

62 *City of Los Angeles, Municipal Code Chapter IV-Public Welfare (Section 41.40), 1984.*

63 *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.1-3.*

categories recommended by the land-use compatibility guidelines set forth in the State of California's 2003 General Plan; or

- The Project causes the ambient noise level measured at the property line of affected uses to increase 5 dBA or greater.[64]

General Noise Ordinance Standards

LAMC Chapter XI, "Noise Regulation," regulates noise from non-transportation noise sources such as commercial or industrial operations, mechanical equipment or residential activities. Although these regulations do not apply to vehicles operating on public rights-of-way, the regulations do apply to noise generated by vehicles on private property, such as truck operations at commercial or industrial facilities. The exact noise standards vary depending on the type of noise source, but the allowable noise levels are generally determined relative to the existing ambient noise levels at the affected location. LAMC Section 111.01 (a) defines the ambient noise as "the composite of noise from all sources near and far in a given environment, exclusive of occasional and transient intrusive noise sources and of the particular noise source or sources to be measured. Ambient noise shall be averaged over a period of at least 15 minutes..." LAMC Section 111.03 provides minimum ambient noise levels for various land uses, as described on Table IV-24. In the event that the actual measured ambient level at a subject location is lower than that provided in the table, the level in the table shall be assumed.

Table IV-24
City of Los Angeles Minimum Ambient Noise Levels

Zone	Allowable Average Noise Level (L_{eq})	
	Daytime (7 am – 10 pm)	Nighttime (10 pm – 7 am)
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50 dB(A)	40 dB(A)
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60 dB(A)	55 dB(A)
M1, MR1, and MR2	60 dB(A)	55 dB(A)
M2 and M3	65 dB(A)	65 dB(A)

Source: LAMC, Section 111.03.

At the boundary line between two zones, the allowable noise level of the quieter zone shall be used. The allowable noise levels are then adjusted if certain conditions apply to the alleged offensive noise, as follows:

- For steady tone noise with an audible fundamental frequency or overtones (except for noise emanating from any electrical transformer or gas metering and pressure control equipment existing and installed prior to September 8, 1986) – reduce allowable noise level by 5 dB(A).

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[64] *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.2-3.*

- For repeated impulsive noise – reduce allowable noise level by 5 dB(A).
- For noise occurring less than 15 minutes in any period of 60 consecutive minutes between the hours of 7:00 AM and 10:00 PM – increase allowable noise level by 5 dB(A).

Additionally, the LAMC states that a noise level increase of 5 dBA or more over the existing average ambient noise level at an adjacent property line is considered a noise violation.[65] This standard applies to sources such as consumer electronics, HVAC systems, powered equipment intended for repeated use in residential areas, and motor vehicles driven onsite. The LAMC also prohibits use of air conditioning, refrigeration, heating, pumping, or filtering equipment that increases ambient noise levels by 5 dBA or more.[66] It also limits noise increases from motor driven vehicles on private property to no more than 5 dBA at adjacent residential properties.[67] Finally, between 10:00 p.m. and 7:00 a.m., the City prohibits the loading or unloading of vehicles, or use of dollies, carts, forklifts, or other wheeled equipment that causes any impulsive sound and/or raucous or unnecessary noise within 200 feet of any residential building.[68]

The City's noise ordinance is not explicit in defining the length of time over which an average noise level should be assessed. However, based on the noted reference to "60 consecutive minutes," above, it is concluded that the one-hour L_{eq} metric should be used. Regarding the location at which the noise measurements should be taken, the LAMC states that "except when impractical, the microphone shall be located four to five feet above the ground and ten feet or more from the nearest reflective surface. However, in those cases where another elevation is deemed appropriated, the latter shall be utilized."

Project Impacts

Construction Noise

During demolition, construction, ground clearing, grading, structural, and other Project phases, noise-generating activities would occur at the Project site between the hours of 7:00 a.m. and 9:00 p.m. in accordance with the LAMC. Table IV-25 summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project site include multi- and single-family residential buildings, as well as commercial land-uses. Of these, there are a number of nearby sensitive receptors to the Project site, including:

- Kinzie Street Residences: single-family residences located along Kinzie Street, 20 feet north of the Project site.

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65 *City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.04), 1986.*

66 *City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.02), 1982.*

67 *Ibid.*

68 *City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.03), 1982.*

- Cielo Apartments: a multi-family residential complex located at 9733 Topanga Canyon Boulevard, 20 feet south of the Project site.

- Nevada Avenue Residences: single-family residences located along Nevada Avenue, 90 feet west of the Project site.

- Pacific Oaks Apartments: a multi-family residential complex located at 9825 Topanga Canyon Boulevard, 320 feet north of the Project site.

Table IV-25
Construction Noise Levels – Without Mitigation

Sensitive Receptor	Distance from Site (feet)	Existing Ambient (dBA, L_{eq})	Maximum Construction Noise Level (dBA)	New Ambient (dBA, L_{eq})	Increase
Kinzie Street Residences	85	66.0	52.7	66.2	13.5
Cielo Apartments	80	72.8	53.8	72.9	19.2
Nevada Avenue Residences	265	61.2	48.3	61.4	13.1
Pacific Oaks Apartments	400	45.0	70.7	70.7	0.0

Source: DKA Planning, 2016.

To ascertain current ambient noise levels at nearby receptors, DKA Planning took short-term, 15-minute noise readings on February 18, 2016, using a Quest Technologies SoundPro DL Sound Level Meter.[69] Noise measurements were taken at these four locations near the Project site. Ambient noise levels were primarily a product of motor vehicles traveling on Topanga Canyon Boulevard. As shown on Table IV-23, ambient noise levels at all receptors ranged from 45.0 dBA L_{eq} at Pacific Oaks Apartments to 72.8 dBA L_{eq} at Cielo Apartments.

Construction activities would generate noise from a variety of on- and off-site activities, and would include the use of on-site heavy equipment such as bulldozers, as well as smaller equipment such as saws, hammers, and pneumatic tools. Secondary noise could also be generated by construction worker vehicles and vendor deliveries.

For this analysis, construction noise impacts were modeled using the noise reference levels of equipment to be operated during the Project's grading and clearing phases, specifically bulldozers. Studies by the

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[69] *The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental noise measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground. Weather conditions were clear with negligible wind.*

Federal Highway Administration have shown that bulldozer operations can produce an average of 82 dBA at a reference distance of 50 feet.[70] Other construction phases would not utilize equipment as loud as those required for site grading and clearing activities. Therefore, this analysis examines a "worst-case-scenario"; the noise impacts of all other construction phases would not exceed those analyzed here.

Given the ambient conditions in the Project area and the proximity of receptors, significant noise impacts could occur at three of the monitored locations during construction of the Project.

- Kinzie Street Residences are projected to experience noise levels of up to 66.2 dBA, an increase of 13.5 dBA. These elevated noise levels would exceed the L.A. CEQA Threshold Guide's 10 dBA noise increase threshold for construction activities lasting between one and ten days in a three month period.

- Cielo Apartments are projected to experience noise levels of up to 72.9 dBA, an increase of 19.2 dBA. These elevated noise levels would exceed the L.A. CEQA Threshold Guide's 10 dBA noise increase threshold for construction activities lasting between one and ten days in a three month period.

- Nevada Avenue Residences are projected to experience noise levels of up to 61.4 dBA, an increase of 13.1 dBA. These elevated noise levels would exceed the L.A. CEQA Threshold Guide's 10 dBA noise increase threshold for construction activities lasting between one and ten days in a three month period.[71]

Additionally, construction noise levels would exceed the City's 75 dBA limit for powered construction equipment within 500 feet of a residential zone.

These on-site construction-related noise impacts would be considered significant. However, implementation of Mitigation Measures 12-1 through 12-6 would reduce incremental increases in noise levels below the L.A. CEQA Threshold Guide's noise threshold while limiting construction noise levels to below the LAMC's 75 dBA limit, and construction noise impacts would be less than significant.

With regard to off-site construction-related noise impacts, haul trucks would remove cut and demolished materials from the Project site during various construction phases. They would transport these materials to regional landfills via a haul route that could expose roadway-adjacent receptors to noise from these heavy-duty vehicles. While such vehicle activity would marginally increase ambient noise levels along

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[70] *Federal Highway Administration. Construction Noise Handbook, 2006.*

[71] *Grading for the Project's proposed surface lot, the loudest Project construction phase, is not expected to exceed 10 working days. Longer measurements of Project construction activities would have markedly lower average dBA projections, as other Project phases would not require the use of heavy-duty grading equipment.*

the haul route, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at haul route-adjacent land uses. According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speed and fleet mix remain constant. Though the addition of haul trucks would alter the fleet mix of the haul route, their minimal addition to local roadways would not nearly double those road's traffic volumes, let alone augment their traffic to levels capable of producing 5.0 dBA or greater increases. Project buildout would require the demolition of the existing parking lot, as well as the excavation of cut materials to grade the site and install foundations. However because the Project would export only 5,500 cubic yards of dirt/debris, maximum haul truck deployment is not likely to exceed an average of more than 10 trips per hour during any construction phase. This increase in traffic would produce negligible noise increases. As a result, off-site construction noise impacts related to haul trucks would be less than significant. Nevertheless, Mitigation Measure 12-7 is recommended to minimize any impacts from haul trucks on sensitive receptors, especially residential land uses. By restricting haul routes from traveling on quieter residential streets more sensitive to noise from heavy-duty haul vehicles, Mitigation Measure 12-7 would ensure that any off-site construction noise impacts would be limited to less- and non-sensitive land-uses along major arterials.

Operational Noise

During Project operations, the development would produce both direct noise impacts on the site from residential-related activities, as well as indirect noise impacts from vehicles traveling on local roads to access the site. The direct impacts would include the following:

- Mechanical Equipment. Stationary noises associated with building operations, such as ground-level heating, ventilation, and air conditioning (HVAC) systems, would generate noise levels between 50 and 65 dBA at 50 feet.[72] Roof-top mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. Based on the distance from the Project site to nearby receptors, the ambient noise levels, and the relatively quiet operation of HVAC systems, increases in ambient noise levels from these on-site noise sources would be inaudible, well below the 5 dBA threshold considered to be a noise violation by the LAMC.

- Landscape Maintenance. Noise generated by gas lawnmowers and leaf blowers generates about 70 dBA at 5 feet of distance from the source. For each doubling of distance from a point noise source, the sound levels decreases by 6 dBA or more. These temporary activities would create short-term increases in noise that would not result in sustained increases in ambient noise levels of 5 dBA or more.

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[72] *Los Angeles Department of City Planning, San Pedro Community Plan Draft EIR, August 2012.*

- Hotel Land Uses. Noise from recurrent activities (e.g., conversation, amplified music, deliveries) or non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to differing degrees. The City's noise ordinance would provide a means to address nuisances related to commercial/retail noise.

- Auto-Related Activities. Occupation of proposed hotel would introduce recurrent, intermittent noise events, such as door slamming and vehicle engine start-ups. These activities generally produce 60-70 dBA at 50 feet of distance. However, these noise events are infrequent and do not significantly increase ambient noise.

These direct sources of on-site noise would generate impacts on a seasonal, irregular, or infrequent basis and would not individually or collectively elevate ambient noise levels substantially at nearby sensitive receptors. The potential noise impacts from these on-site operational sources would be less than significant.

The majority of operational noise impacts would be from indirect noise impacts associated with the 1,209 net new vehicle trips each weekday.[73] The impact of this additional traffic on ambient noise levels in the Project's vicinity was modeled for the 2015 Existing and Existing With Project scenarios and the 2018 Future Without and Future With Project scenarios, utilizing the FHWA TNM 2.5 model. As shown on Tables IV-26 through IV-29, traffic conditions that include Project traffic would not generate a noticeable increase in noise. Therefore, Project impacts related to traffic noise would be less than significant.

Table IV-26
Existing and Existing With Project Scenarios
Estimated AM Peak-Hour Mobile Source Noise Levels

Roadway Segment	Estimated dBA, CNEL			
	Existing (2015)	Existing With Project (2015)	Project Change	Significant Impact?
N/B Topanga Canyon Boulevard to Devonshire Street	72.6	72.6	0.0	No
S/B Topanga Canyon Boulevard to Lassen Street	74.0	74.0	0.0	No
N/B Topanga Canyon Boulevard to Plummer Street	70.9	70.9	0.0	No
S/B Topanga Canyon Boulevard to Prairie Street	75.6	75.6	0.0	No

Source: DKA Planning, 2016.

[73] *Overland Traffic Consultants, Inc.; Traffic Impact Analysis for a Mixed-Use Project Located at 6901 Santa Monica Boulevard; June 2015.*

Table IV-27
Existing and Existing With Project Scenarios
Estimated PM Peak-Hour Mobile Source Noise Levels

Roadway Segment	Estimated dBA, CNEL			
	Existing (2015)	Existing With Project (2015)	Project Change	Significant Impact?
N/B Topanga Canyon Boulevard to Devonshire Street	73.4	73.4	0.0	No
S/B Topanga Canyon Boulevard to Lassen Street	74.2	74.2	0.0	No
N/B Topanga Canyon Boulevard to Plummer Street	71.3	71.3	0.0	No
S/B Topanga Canyon Boulevard to Prairie Street	75.2	75.2	0.0	No

Source: DKA Planning, 2016.

Table IV-28
Future Without and With Project Scenarios
Estimated AM Peak-Hour Mobile Source Noise Levels

Roadway Segment	Estimated dBA, CNEL			
	Future Without (2018)	Future With Project (2018)	Project Change	Significant Impact?
N/B Topanga Canyon Boulevard to Devonshire Street	72.9	72.9	0.0	No
S/B Topanga Canyon Boulevard to Lassen Street	74.3	74.3	0.0	No
N/B Topanga Canyon Boulevard to Plummer Street	71.2	71.2	0.0	No
S/B Topanga Canyon Boulevard to Prairie Street	75.9	75.9	0.0	No

Source: DKA Planning, 2016.

Table IV-29
Future Without and With Project Scenarios
Estimated PM Peak-Hour Mobile Source Noise Levels

Roadway Segment	Estimated dBA, CNEL			
	Future Without Project (2018)	Future With Project (2018)	Project Change	Significant Impact?
N/B Topanga Canyon Boulevard to Devonshire Street	73.7	73.7	0.0	No
S/B Topanga Canyon Boulevard to Lassen Street	74.5	74.5	0.0	No
N/B Topanga Canyon Boulevard to Plummer Street	71.7	71.7	0.0	No
S/B Topanga Canyon Boulevard to Prairie Street	75.5	75.5	0.0	No

Source: DKA Planning, 2016.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The analysis of Project impacts related to noise is based on the Noise Modeling Results, prepared by DKA Planning, Inc. (refer to Appendix B).

Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Common sources of vibration include trains, buses, and construction activities.

Vibration Definitions

The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans, which is around 65 RMS. Most perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration are construction equipment, trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is typically not perceptible.

Applicable Regulations

To counter the effects of ground-borne vibration, the California Department of Transportation (Caltrans) has published guidance relating to structural vibration impacts. According to Caltrans, modern industrial/commercial buildings and new residential structures can be exposed to continuous ground-borne vibration levels of 0.5 inches per second without experiencing structural damage.[74] Additionally, the Federal Transit Administration (FTA) has established guidelines that provide significance thresholds for ground-borne vibration disrupting various land uses. For institutional land uses such as schools, churches, and offices experiencing occasional events of ground-borne vibration or noise from transient sources, the FTA has established a threshold of 78 VdB.[75] For recording and TV studio land uses, the threshold is 65 VdB for all events.[76]

In terms of construction-related impacts on buildings, the City has not adopted policies or guidelines relative to ground-borne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to ground-borne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, Caltrans' adopted vibration standards for buildings are used to evaluate potentially damaging structural impacts related to Project construction. Table IV-30 identifies Caltrans' building damage significance thresholds.

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[74] *California Department of Transportation. Transportation and Construction Vibration Guidance Manual, September 2013.*

[75] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

[76] *Ibid.*

Table IV-30
Building Damage Vibration Thresholds (PPV)

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/Frequent / Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: California Department of Transportation, 2013.		

The City has also not adopted any thresholds associated with land-use disruption caused by ground-borne vibration. Therefore, this analysis uses the FTA's vibration impact thresholds for land use disruption, which are presented below on Table IV-31.

Table IV-31
Land Use Disruption Vibration Thresholds (VdB)

Land Use	Significance Thresholds (VdB)		
	Frequent Events	Occasional Events	Infrequent Events
Buildings where vibration would interfere with interior operations.	65	65	65
Residences and buildings where people normally sleep.	72	75	80
Institutional land uses with primarily daytime use	75	78	83
Concert halls, TV studios, and recording studios	65	65	65
Auditoriums and theaters	72	80	80
Source: Federal Transit Administration, 2006			

Project Impacts

Ground-borne vibration would be generated by a number of on-site construction activities. As a result of bulldozer operations, vibration velocities of up to 0.065 inches per second PPV are projected to occur at Cielo Apartments, the nearest off-site sensitive receptor. This is far below the 0.5 inches per second PPV threshold that is considered potentially harmful to new residential structures. As shown on Table IV-32, more distant receptors would experience even lower ground velocities. Other potential activities would

produce even less vibration and have lesser potential impacts on nearby sensitive receptors. As a result, construction-related structural vibration impacts would be less than significant.

Table IV-32
Building Damage Vibration Levels at Off-Site Structures

Off-Site Structures	Distance to Project Site (ft.)	Estimated PPV (in/sec)	Structural Significance Threshold (in/sec)	Significant?
Kinzie Street Residences	20	0.011	0.3	No
Cielo Apartments	15	0.065	0.5	No
Pacific Oaks Apartments	320	0.002	0.5	No
Source: DKA Planning 2016.				

In terms of land-use disruption, on-site bulldozer operations would have minimal impacts. As shown on Table IV-33, maximum ground-borne vibration levels at nearby receptors are projected to be far lower than FTA residential vibration thresholds. These impacts would be less than significant.

Table IV-33
Land Use Interference Vibration Levels

Off-Site Receptor – Land Use	Distance to Project Site (ft.)	Estimated VdB	Land-Use Interference Threshold (VdB)	Significant?
Kinzie Street Residences	20	60.9	80	No
Cielo Apartments	15	64.7	80	No
Pacific Oaks Apartments	320	24.8	80	No
Source: DKA Planning 2016.				

Structural and land-use vibration impacts were not analyzed for Nevada Avenue Residences. Given its 90-foot distance from the nearest Project site boundary, that receptor would not be expected to experience any perceptible Project-related ground-borne vibration. Additionally, residences at this receptor location lie on a hill approximately 40 feet above the Project site. Similar to how barriers attenuate noise by obstructing its line-of-sight travel, terrain features obstruct direct source-to-receptor ground-borne vibration paths. At Nevada Avenue Residences, Project-generated ground-borne vibration would have no impact.

The Project could also generate vibration from the hauling of demolition and cut materials from the Project site. This could increase vibration levels at sensitive receptors along haul route roadways, though any annoyance to residents along these routes would be temporary and minor. Implementation of Mitigation Measure 12-7 would limit the movement of haul vehicles to major arterials with few sensitive

land uses and high existing levels of traffic. Therefore, Project vibration impacts associated with haul truck trips would be less than significant.

c) Would the project result in a substantial permanent increase in ambient noise levels in the Project site vicinity above levels existing without the project?

Less Than Significant Impact With Mitigation Incorporated. As discussed in response to Checklist Question 12a, the Project would not generate a substantial permanent increase in noise in excess of City noise standards. Therefore, Project impacts related to permanent noise increase would be less than significant.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the Project site vicinity above levels existing without the project?

Less Than Significant Impact With Mitigation Incorporated. As discussed in response to Checklist Question 12a, the Project would not result in a substantial temporary or periodic increase in ambient noise levels in excess of City noise standards. Therefore, Project impacts related to temporary or periodic noise increase would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels and no impact would occur.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project site is not located in the vicinity of a private airstrip. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels and no impact would occur.

Mitigation Measures (Noise)

To ensure that the Project's construction noise impacts would be less than significant, the following mitigation measures are required (refer to Table IV-34):

12-1 The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for

the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Table IV-34
Construction Noise Levels – With Mitigation

Sensitive Receptor	Distance from Site (feet)	Existing Ambient (dBA, L_{eq})	Maximum Construction Noise Level (dBA)	New Ambient (dBA, L_{eq})	Increase
Kinzie Street Residences	85	57.7	52.7	58.9	6.2
Cielo Apartments	80	<69.8	53.8	<63.8	<10.0
Nevada Avenue Residences	265	<58.2	48.3	<58.3	<10.0
Pacific Oaks Apartments	400	42.0	70.7	70.7	0.0

Source: DKA Planning, 2016.

12-2 Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.

12-3 All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance.

12-4 All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent noise-sensitive land uses.

12-5 Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.

12-6 Temporary sound barriers shall be installed as specified:

- A temporary sound barrier no less than 10 feet in height shall be erected to block line-of-sight noise travel from the Project site to Kinzie Street Residences and other neighboring residences to the Project's north. This barrier shall be constructed in such a way so as to have a surface weight of four pounds per square foot or greater, and the Project-facing side should be lined with exterior grade acoustical blankets to provide additional sound absorption. This barrier should extend along the northern boundary of the Project site to prevent on-site construction noise from diffracting around its ends.

- A temporary sound barrier no less than 10 feet in height shall be erected to block line-of-sight noise travel from the Project site to Cielo Apartments. This barrier shall be constructed in such a way so as to have a surface weight of four pounds per square foot or greater, and the Project-facing side should be lined with exterior grade acoustical blankets to provide additional sound absorption. This barrier should extend along the southern boundary of the Project site to prevent on-site construction noise from diffracting around its ends.

- A temporary sound barrier no less than 10 feet in height shall be erected to block line-of-sight noise travel from the Project site to Nevada Avenue Residences. This barrier shall be constructed in such a way so as to have a surface weight of four pounds per square foot of greater, and the Project-facing side should be lined with exterior grade acoustical blankets to provide additional sound absorption. This barrier should extend along the western boundary of the Project site to prevent on-site construction noise from diffracting around its ends.

- At all other Project boundaries, temporary noise barriers no less than 7 feet in height shall be erected to prevent Project construction operations from exceeding the LAMC's 75 dBA limit for construction noise within 500 feet of residential zones.

12-7 A haul route for exporting cut materials from the site shall access local freeways via major arterials such as Topanga Canyon Boulevard. The route should avoid traveling on residential streets, especially those passing through the neighborhoods directly to the Project's north, west, and south.

13. POPULATION AND HOUSING

a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project includes development of the Project site with a 105-guest-room hotel and surface parking. The Project would employ approximately 50 people. The types of jobs that would be made available by the Project could be filled by people already living in the Project area and surrounding communities. The Project would not create such an increase in employment that would cause a substantial number of new people to move to the Project area and surrounding communities to fill the employment positions. Also, the Project does not include the development of housing and would be served by existing roadways and utility infrastructure. For these reasons, the Project would not induce substantial population growth, and impacts related to this issue would be less than significant.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. No housing is located on the Project site. Therefore, no impacts related to this issue would occur as a result of the Project.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. No people live at the Project site. Therefore, no impacts related to this issue would occur as a result of the Project.

14. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:

(i) Fire protection?

Less Than Significant Impact. The Project includes development of a 105-guest-room hotel and surface parking, increasing the need for fire protection services at the Project site. The factors that the Los Angeles Fire Department (LAFD) considers in determining whether fire protection services for a project is adequate include: (1) maximum response distance for the land uses proposed; (2) compliance with emergency access requirements; (3) compliance with fire-flow requirements; and (4) compliance with fire hydrant placement.[77] The Project site is served by Fire Station 96, which is 0.2 mile east of the Project site on Marilla Street. All ingress/egress and emergency access associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Therefore, the Project would not result in any significant impacts related to emergency access. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Through compliance with these mandatory requirements, Project impacts related to fire protection services would be less than significant.

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[77] *L.A. CEQA Thresholds Guide, City of Los Angeles, 2006.*

(ii) Police protection?

Less Than Significant Impact. The Project includes development of a 105-guest-room hotel and surface parking, increasing the need for fire protection services at the Project site. However, in accordance with the City's requirements, the Project developer would be required to refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the LAPD. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. The Project would include standard security measures such as adequate security lighting, controlled building access, and secure parking facilities. These measures for the Project shall be approved by the LAPD prior to the issuance of building permits. Through compliance with the mandatory requirements of the LAPD, Project impacts related to police protection services would be less than significant.

(iii) Schools?

Less Than Significant Impact. The Project includes development of a 105-guest-room hotel and surface parking. The Project does not include development of any residential population that would increase the need for school services. The Project would employ approximately 50 people. The types of jobs that would be made available by the Project could be filled by people already living in the Project area and surrounding communities. The Project would not create such an increase in employment that would cause a substantial number of new people (with school-age children) to move to the Project area and surrounding communities to fill the employment positions. Additionally, pursuant to the California Government Code, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

(iv) Parks?

No Impact. The Project includes development of a 105-guest-room hotel and surface parking. The Project does not include development of any residential population that would increase the need for parks and recreational facilities. Additionally, the hotel would include a gym and swimming pool for guest use. For these reasons, the Project would not create the need for new or altered parks and recreational facilities. Therefore, no impacts related to parks and recreational facilities would occur as a result of the Project.

(v) Other public facilities?

Libraries

No Impact. The Project includes development of a 105-guest-room hotel and surface parking. The Project does not include development of any residential population that would increase the need for

library services. The Project would not create the need for new or altered library facilities. Therefore, no impacts related to library services would occur as a result of the Project.

15. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. Refer to the response to Checklist Question 14iv (Parks).

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. Refer to the response to Checklist Question 14iv (Parks).

16. TRANSPORTATION AND TRAFFIC

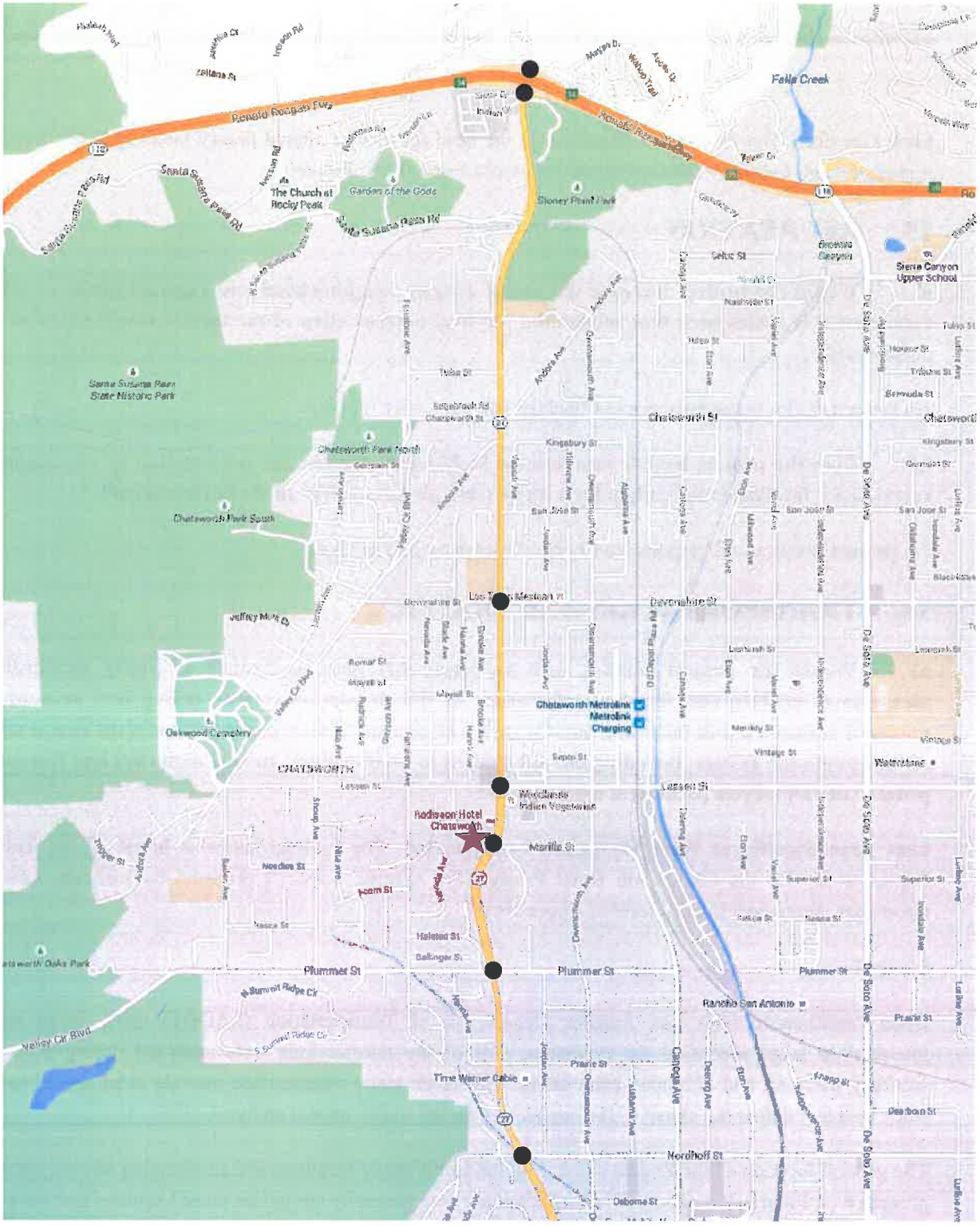
a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant With Mitigation Incorporated. The analysis below is based on the Traffic Impact Study for the Chatsworth Hotel Project (the "Traffic Report") prepared by Linscott, Law & Greenspan, Engineers (LLG) (refer to Appendix F).

Study Area

Upon coordination with Los Angeles Department of Transportation (LADOT) staff, seven study intersections were identified for evaluation. All of the intersections were analyzed during both the weekday morning and afternoon peak hours. The seven study intersections provide local access to the study area and define the extent of the boundaries for the traffic impact analysis.

The general location of the Project site in relation to the study locations and surrounding street system is presented on Figure IV-1. The traffic analysis study area generally comprises those locations that have the greatest potential to experience significant traffic impacts due to the Project as defined by the LADOT. In the traffic engineering practice, the study area generally includes those intersections that are as follows:



MAP SOURCE: GOOGLE MAPS

★ PROJECT SITE

● STUDY INTERSECTION

Source: Linscott, Law & Greenspan, engineers.

NORTH

Not to Scale

CAJA Environmental Services, LLC

Figure IV-1
Study Intersections

a. Immediately adjacent or in close proximity to the Project site;

b. In the vicinity of the Project site that are documented to have current or projected future adverse operational issues; and

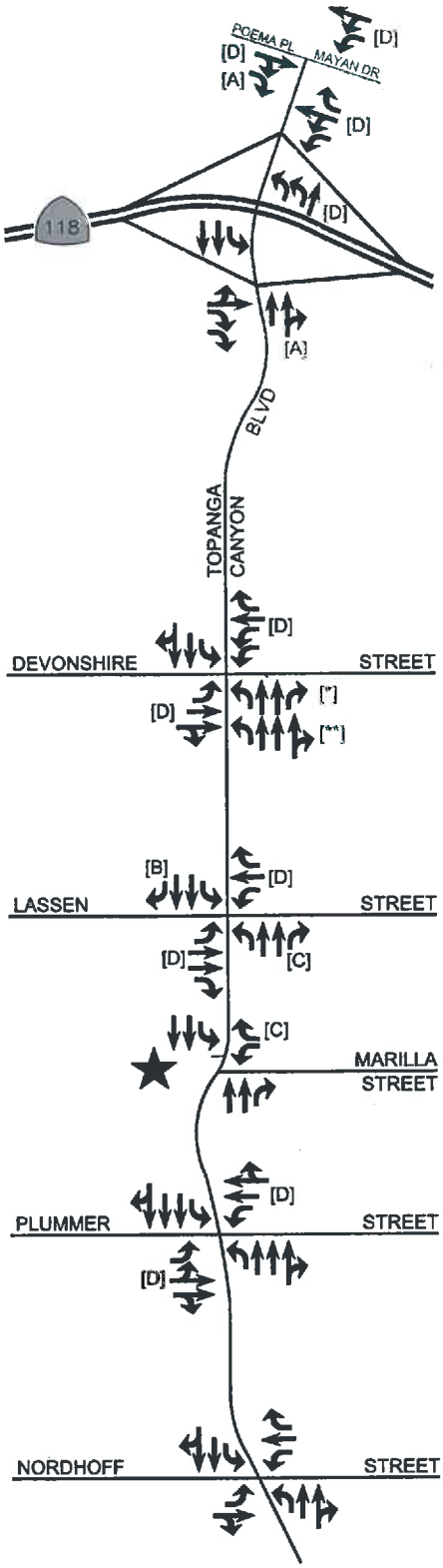
c. In the vicinity of the Project site that are forecast to experience a relatively greater percentage of Project-related vehicular turning movements (e.g., at freeway ramp intersections).

The locations selected for analysis were based on the above criteria, the Project peak-hour vehicle trip generation, the anticipated distribution of Project vehicular trips, and existing intersection/corridor operations.

Study Intersections

The seven study intersections selected for analysis are currently controlled by traffic signals. The existing lane configurations at the study intersections are displayed on Figure IV-2.

1. Topanga Canyon Boulevard (SR-27) / SR-118 WB Ramps
2. Topanga Canyon Boulevard (SR-27) / SR-118 EB Ramps
3. Topanga Canyon Boulevard (SR-27) / Devonshire Street
4. Topanga Canyon Boulevard (SR-27) / Lassen Street
5. Topanga Canyon Boulevard (SR-27) / Marilla Street
6. Topanga Canyon Boulevard (SR-27) / Plummer Street
7. Topanga Canyon Boulevard (SR-27) / Nordhoff Street



★ PROJECT SITE

NOTE: ALL STUDY INTERSECTIONS ARE SIGNALIZED

[A] = NO RIGHT-TURN ON RED
[B] = DEFACTO RIGHT-TURN
[C] = RIGHT-TURN OVERLAP
[D] = SPLIT PHASING

[*] = AM PEAK HOUR
[**] = PM PEAK HOUR

Not to Scale

Source: Linscott, Law & Greenspan, engineers.

CAJA Environmental Services, LLC

Figure IV-2
Existing Lane Configurations

Methodologies

Based on LADOT's current traffic study policies, this study uses the Critical Movement Analysis (CMA) methodology for the analysis and evaluation of traffic operations at signalized intersections under their jurisdiction, as detailed in Circular Number 212 published by the Transportation Research Board (TRB).[78] This analysis technique describes the operating characteristics of an intersection in terms of the "Level of Service" (LOS) based on intersection traffic volume and other variables such as number and type of signal phasing, lane geometries, and other factors which determine both the quantity of traffic that can move through an intersection (Capacity) and the quality of that traffic flow (LOS).

"Capacity" represents the maximum total hourly volume of vehicles in the critical lanes that has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. Critical lanes are defined generally as those intersection movements or groups of movements which exhibit the highest "per lane" volumes, thus defining the maximum amount of vehicles attempting to travel through the intersection during a specific time period. The capacity of an intersection also varies based on the number of signal phases for the location; more signal phases generally result in more "lost" or "startup" time, as drivers exhibit slight reaction delays when signal indications change from "red" to "green." For the CMA analysis methodology, the intersection capacities associated with the various levels of service are therefore based on the number of traffic signal phases, as shown on Table IV-35.

Table IV-35
CMA Volume Ranges per LOS*

LOS	Maximum Sum of Critical Volumes (VPH) vs. Number of Signal Phases		
	Two Phases	Three Phases	For or More Phases
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	NA	NA	NA

* *For planning applications only. Not appropriate for operations/design applications.*

For the intersection evaluation and transportation planning purposes of this traffic study, LADOT policy requires that the maximum "baseline" capacity of an intersection equate to the value associated with LOS E shown on Table IV-35. This value represents the highest volume of traffic that can be adequately

[78] *Interim Materials on Highway Capacity, Circular Number 212, Transportation Research Board, Washington, D.C., 1980.*

accommodated through urban area intersections without a breakdown in operations, resulting in unstable traffic flows, high levels of congestion, and long delays.

The "Critical Movement" indices at an intersection are determined by first identifying the sum of the critical lane traffic volumes at the intersection. This total traffic *volume* value, which represents the most critical intersection demand, is then divided by the appropriate intersection *capacity* value for the type of signal control at the intersection, to determine the "CMA value" for the intersection that is roughly equivalent to its volume-to-capacity ratio.

LOS describes the quality of traffic flow through the intersection. LOS A through LOS C exhibit good traffic flow characteristics, with little congestion. LOS D is typically the level for which metropolitan area street systems are designated, and represents the highest level of acceptable congestion and delay. LOS E defines conditions at or near the capacity of an intersection, and is characterized by short-duration stoppages and unstable traffic flows at its upper range. LOS F occurs when a facility is overloaded, and is characterized by stop-and-go traffic with long duration delays. Note that the LOS definitions do not represent a single operating condition, but rather correspond to a range of CMA values, as shown on Table IV-36.

Table IV-36
LOS Definitions for Signalized Intersections (CMA Method)

LOS	Intersection Capacity Utilization	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several cycles.
F	> 1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980.

Existing Conditions

Roadway Descriptions

A brief description of the important roadways in the Project vicinity is provided in the following paragraphs.

Topanga Canyon Boulevard (State Route 27) is a north-south oriented roadway that borders the Project site to the east. Within the Project study area, Topanga Canyon Boulevard is designated as a Major Highway Class II in the City of Los Angeles Circulation Element of the General Plan. Two through travel lanes are generally provided in both directions on Topanga Canyon Boulevard in the Project study area. Separate left-turn lanes are provided on Topanga Canyon Boulevard at major intersections. A separate northbound right-turn lane is provided at the Marilla Street intersection. Topanga Canyon Boulevard is posted for a 45 miles per hour speed limit in the Project site vicinity

Devonshire Street is an east-west oriented roadway located north of the Project site. Within the Project study area, Devonshire Street is designated as a Major Highway Class II in the City of Los Angeles Circulation Element of the General Plan. Two through travel lanes are generally provided in the eastbound direction and one through travel lane is generally provided in the westbound direction on Devonshire Street in the Project study area. Separate left-turn lanes are provided on Devonshire Street at major intersections. Devonshire Street is posted for a 25 miles per hour speed limit in the Project vicinity.

Lassen Street is an east-west oriented roadway located north of the Project site. Within the Project study area, Lassen Street is designated as a Collector Street west of Topanga Canyon Boulevard and as a Secondary Highway east of Topanga Canyon Boulevard in the City of Los Angeles Circulation Element of the General Plan. Two through travel lanes are generally provided in the eastbound direction and one through travel lane is generally provided in the westbound direction of Lassen Street within the Project study area. Separate left-turn lanes are provided on Lassen Street at major intersections. Lassen Street is posted for a 40 miles per hour speed limit in the Project site vicinity.

Marilla Street is an east oriented roadway located east of the Project site. Within the Project study area, Marilla Street is designated as a Secondary Highway in the City of Los Angeles Circulation Element of the General Plan. Marilla Street transitions to Canoga Avenue east of Topanga Canyon Boulevard. Separate left-turn lane and right-turn lanes are provided on Marilla Street at the Topanga Canyon Boulevard intersection. Marilla Street is posted for a 40 miles per hour speed limit in the Project site vicinity.

Plummer Street is an east-west oriented roadway located south of the Project site. Within the Project study area, Plummer Street is designated as a Major Highway Class II west of Topanga Canyon Boulevard and as a Secondary Highway east of Topanga Canyon Boulevard in the City of Los Angeles Circulation Element of the General Plan. Two through travel lanes are generally provided in both directions of Plummer Street within the Project study area. Separate left-turn lanes are provided on

Plummer Street at major intersections. Plummer Street is posted for a 35 miles per hour speed limit in the Project site vicinity.

Nordhoff Street is an east-west oriented roadway that is located south of the Project site. Within the Project study area, Nordhoff Street is designated as a Collector Street west of Topanga Canyon Boulevard and as a Major Highway Class II east of Topanga Canyon Boulevard in the City of Los Angeles Circulation Element of the General Plan. One through travel lane is generally provided in both directions on Nordhoff Street within the Project study area. Separate left-turn lanes are provided on Nordhoff Street at major intersections. Nordhoff Street is posted for a 40 miles per hour speed limit in the Project site vicinity.

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, ATSAC/ATCS system upgrades for all seven study intersections have been implemented. As such, the LOS calculations in this traffic analysis reflect a 0.10 adjustment for all analysis scenarios evaluated.

Transit Service

Public bus transit service within the Project study area is currently provided by Los Angeles County Metropolitan Transit Authority (Metro). A summary of the existing transit service, including the transit route, destinations, and peak-hour headways is presented on Table IV-37. The existing public transit routes in the Project site vicinity are illustrated on Figure IV-3. It is noted that the terminus of the Metro Orange Line is located within a mile of the Project site.

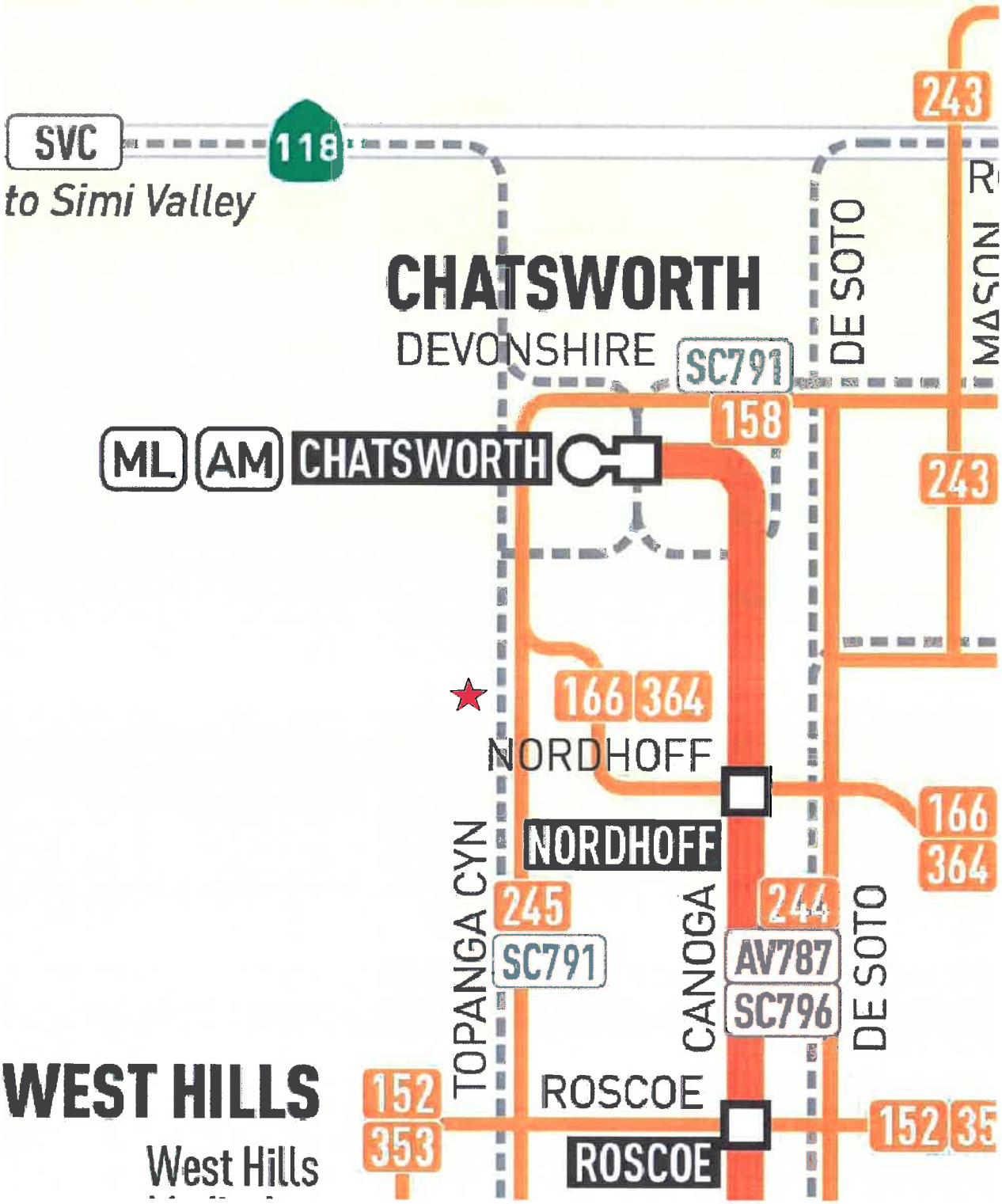
Table IV-37
Existing Transit Routes

Route	Destinations	Roadway(s) Near Site	No. of Buses/Trains During Peak Hour		
			DIR	AM	PM
Metro 166/364	Chatsworth Station to Sun Valley (via Plummer Street, Coldwater Canyon Avenue	Topanga Canyon Blvd	EB	3	8
			WB	10	4
Metro 245	Chatsworth Station to Woodland Hills	Topanga Canyon Blvd	NB	3	3
			SB	2	2
Metro Orange Line	Chatsworth Station to North Hollywood Station	Topanga Canyon Blvd	EB	7	8
			WB	8	8
			Total	**33**	**33**

Sources: Los Angeles County Metropolitan Transportation Authority (Metro) website, 2015.

Existing Traffic Conditions

Manual traffic counts of vehicular turning movements were conducted at each of the seven study intersections 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 from 7:00 AM to 10:00 AM and 3:00 PM to 6:00 PM to determine the respective peak commuter hours. The intersection traffic counts were conducted when local schools were in session. The existing traffic volumes at the study intersections during the weekday AM and PM peak hours are shown on Figure IV-4.



SOURCE: METROPOLITAN TRANSPORTATION AUTHORITY

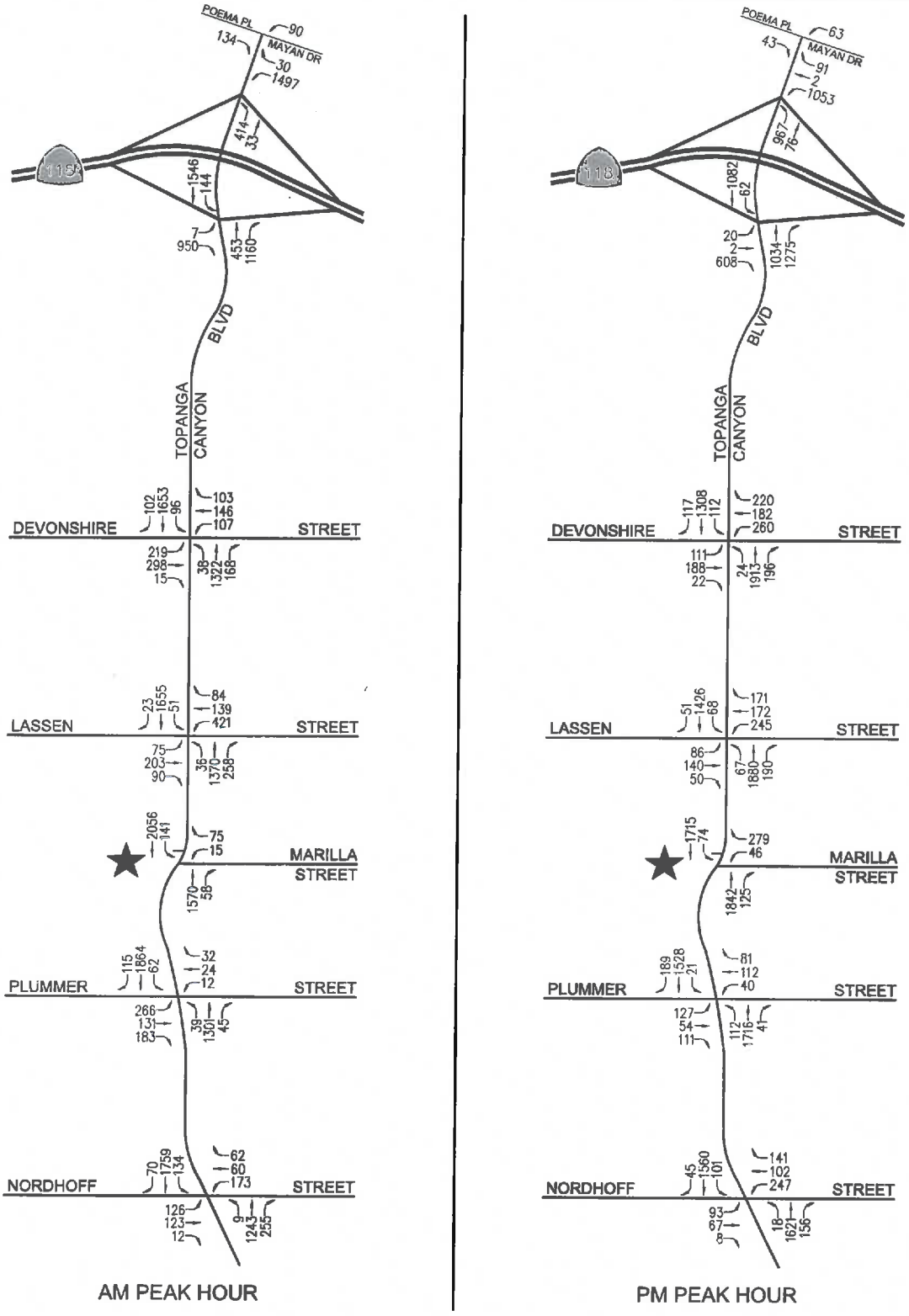
★ PROJECT SITE

Source: Linscott, Law & Greenspan, engineers.

Not to Scale

CAJA Environmental Services, LLC

Figure IV-3
Existing Public Transit Routes



Source: Linscott, Law & Greenspan, engineers.

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Figure IV-4
Existing Traffic Volumes

The weekday AM and PM peak-period manual counts of vehicle movements at the study intersections are summarized on Table IV-38.

Table IV-38
Existing Traffic Volumes

No.	Intersection	Date	DIR	AM Peak Hour		PM Peak Hour	
				Began	Volume	Began	Volume
1	Topanga Canyon Blvd/ CA-118 WB Ramps	06/02/2015	NB	7:00	447	4:45	1,043
			SB		90		63
			EB		134		43
			WB		1,527		1,146
2	Topanga Canyon Blvd/ CA-118 EB Ramps	06/02/2015	NB	7:00	1,613	4:45	2,309
			SB		1,690		1,144
			EB		957		630
			WB		0		0
3	Topanga Canyon Blvd/ Devonshire Street	06/02/2015	NB	7:15	1,528	4:30	2,133
			SB		1,851		1,537
			EB		532		321
			WB		356		662
4	Topanga Canyon Blvd/ Lassen Street	06/02/2015	NB	7:15	1,664	4:30	2,137
			SB		1,729		1,545
			EB		368		276
			WB		644		588
5	Topanga Canyon Blvd/ Marilla Street	06/02/2015	NB	7:15	1,628	4:45	1,967
			SB		2,197		1,789
			EB		0		0
			WB		90		325
6	Topanga Canyon Blvd/ Plummer Street	06/02/2015	NB	7:15	1,385	5:00	1,869
			SB		2,041		1,738
			EB		580		292
			WB		68		233
7	Topanga Canyon Blvd/ Nordhoff Street	06/02/2015	NB	7:30	1,507	5:00	1,795
			SB		1,963		1,706
			EB		261		168
			WB		295		490

(1) National Data & Surveying Services

As indicated in column [1] of Table IV-39, five of the seven study intersections are currently operating at LOS D or better during the weekday AM and PM peak hours under existing conditions. The following intersections are presently operating at LOS E or worse during the peak hours shown as follows under existing conditions:

- Int. No. 2: Topanga Canyon Boulevard / CE-118 EB Ramps
- Int. No. 4: Topanga Canyon Boulevard / Lassen Street

Table IV-39
Summary of Volume to Capacity Ratios and Levels of Service
AM and PM Peak Hours

No.	Intersection	Peak Hour	[1] Year 2015 Existing		[2] Year2015 Existing W/Project		Change V/C	Signif. Impact	[3] Year 2018 Future Pre-Project		[4] Year 2018 Future With Project		Change V/C	Signif. Impact	[5] Year 2018 W/Project Mitigation		Change V/C	Mitigated
			V/C	LOS	V/C	LOS	[(2)-(1)]	[a]	V/C	LOS	V/C	LOS	[(4)-(3)]	[a]	V/C	LOS	[(5)-(3)]	
1	Topanga Canyon Blvd/ CA-118 WB Ramps	AM	0.692	B	0.695	B	0.003	NO	0.791	C	0.794	C	0.003	NO	0.794	C	0.003	--
		PM	0.710	C	0.714	C	0.004	NO	0.790	C	0.795	C	0.005	NO	0.795	C	0.004	--
2	Topanga Canyon Blvd/ CA-118 EB Ramps	AM	1.182	F	1.187	F	0.005	NO	1.316	F	1.321	F	0.005	NO	1.321	F	0.005	--
		PM	1.073	F	1.079	F	0.006	NO	1.182	F	1.188	F	0.006	NO	1.188	F	0.006	--
3	Topanga Canyon Blvd/ Devonshire St	AM	0.832	D	0.835	D	0.003	NO	0.899	D	0.904	E	0.005	NO	0.904	E	0.004	--
		PM	0.706	C	0.709	C	0.003	NO	0.771	C	0.775	C	0.004	NO	0.775	C	0.0041	--
4	Topanga Canyon Blvd/ Lassen St	AM	0.909	E	0.934	E	0.025	YES	0.984	E	1.010	F	0.026	YES	0.899	D	-0.084	YES
		PM	0.862	D	0.877	D	0.015	NO	0.936	E	0.951	E	0.015	YES	0.931	E	-0.005	YES
5	Topanga Canyon Blvd/ Marilla St	AM	0.632	B	0.640	B	0.008	NO	0.686	B	0.694	B	0.008	NO	0.694	B	0.008	--
		PM	0.742	C	0.755	C	0.013	NO	0.805	D	0.818	D	0.013	NO	0.818	D	0.013	--
6	Topanga Canyon Blvd/ Plummer St	AM	0.654	B	0.656	B	0.002	NO	0.723	C	0.725	C	0.002	NO	0.725	C	0.002	--
		PM	0.588	A	0.592	A	0.004	NO	0.652	B	0.655	B	0.003	NO	0.655	B	0.003	--
7	Topanga Canyon Blvd/ Nordhoff St	AM	0.765	C	0.767	C	0.002	NO	0.838	D	0.841	D	0.003	NO	0.841	D	0.003	--
		PM	0.821	D	0.824	D	0.003	MP	0.901	E	0.904	E	0.003	NO	0.904	E	0.004	--

[a] According to LADOT's "Traffic Study Policies and Procedures", August 2014, a transportation impact on an intersection shall be deemed significant in accordance with the following table:

Final V/C	*LOS*	*Project Related Increase in v/c*
0.701-0.800	*C*	*Equal to or greater than 0.040*
0.801-0.900	*D*	*Equal to or greater than 0.020*
>0.901	*E, F*	*Equal to or greater than 0.010*

Threshold of Significance

LADOT's significance criteria for determining intersection LOS impacts are shown on Table IV-40.

Table IV-40
LADOT Intersection Significance Thresholds

Intersection Conditions with Project Traffic		Project-related Increase in V/C Ratio
LOS	V/C	
C	0.701 - 0.800	Equal to or greater than 0.04
D	0.801 - 0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01

Source: LADOT.

Project Impacts

Trip Generation

The Project's traffic volumes during the weekday AM and PM peak hours, as well as on a daily basis, were estimated using rates published in the ITE *Trip Generation* manual. The following trip generation rates were used to forecast the traffic volumes expected to be generated by the Project land use components:

- Hotel: ITE Land Use Code 310 (hotel) trip generation average rates were used to forecast the traffic volumes expected to be generated by the hotel component of the Project.

The trip generation forecast for the Project is summarized on Table IV-41.

Table IV-41
Project Trip Generation (1)

Land Use	Size	Daily Trip Ends (2) Volumes	AM Peak Hour Volumes (2)			PM Peak Hour Volumes (2)		
			In	Out	Total	In	Out	Total
Proposed Project Hotel (3)	136 Rooms	1,111	42	30	72	42	40	82
Net Increase		**1,111**	**42**	**30**	**72**	**42**	**40**	**82**

(1) Source: ITE "Trip Generation", 9th Edition, 2012.
(2) Trips are one-way traffic movements, entering or leaving.
(3) ITE Land Use Code 310 (Hotel) trip generation average rates.
-Daily trip Rate: 8.17 trips/room; 50% inbound/50% outbound
-AM Peak Hour Trip Rate: 0.53 trips/room; 59% inbound/41% outbound
-PM Peak Hour Trip Rate: 0.60 trips/room; 51% inbound/49% outbound

As presented on Table IV-40, the Project is expected to generate 78 net new vehicle trips (46 inbound trips and 32 outbound trips) during the AM peak hour. During the PM peak hour, the Project is expected

to generate 89 net new vehicle trips (45 inbound trips and 44 outbound trips). Over a 24-hour period, the Project is forecast to generate a net increase of 1,209 daily trip ends (approximately 605 inbound trips and 604 outbound trips) during a typical weekday.

Trip Distribution and Assignment of Project Traffic

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 Project site's proximity to major traffic corridors (i.e. Topanga Canyon Boulevard, SR-118 Freeway, 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;
- The location of existing and proposed parking areas;
- Nearby population and employment centers as well as adjacent residential neighborhoods; and
- Input from LADOT staff.

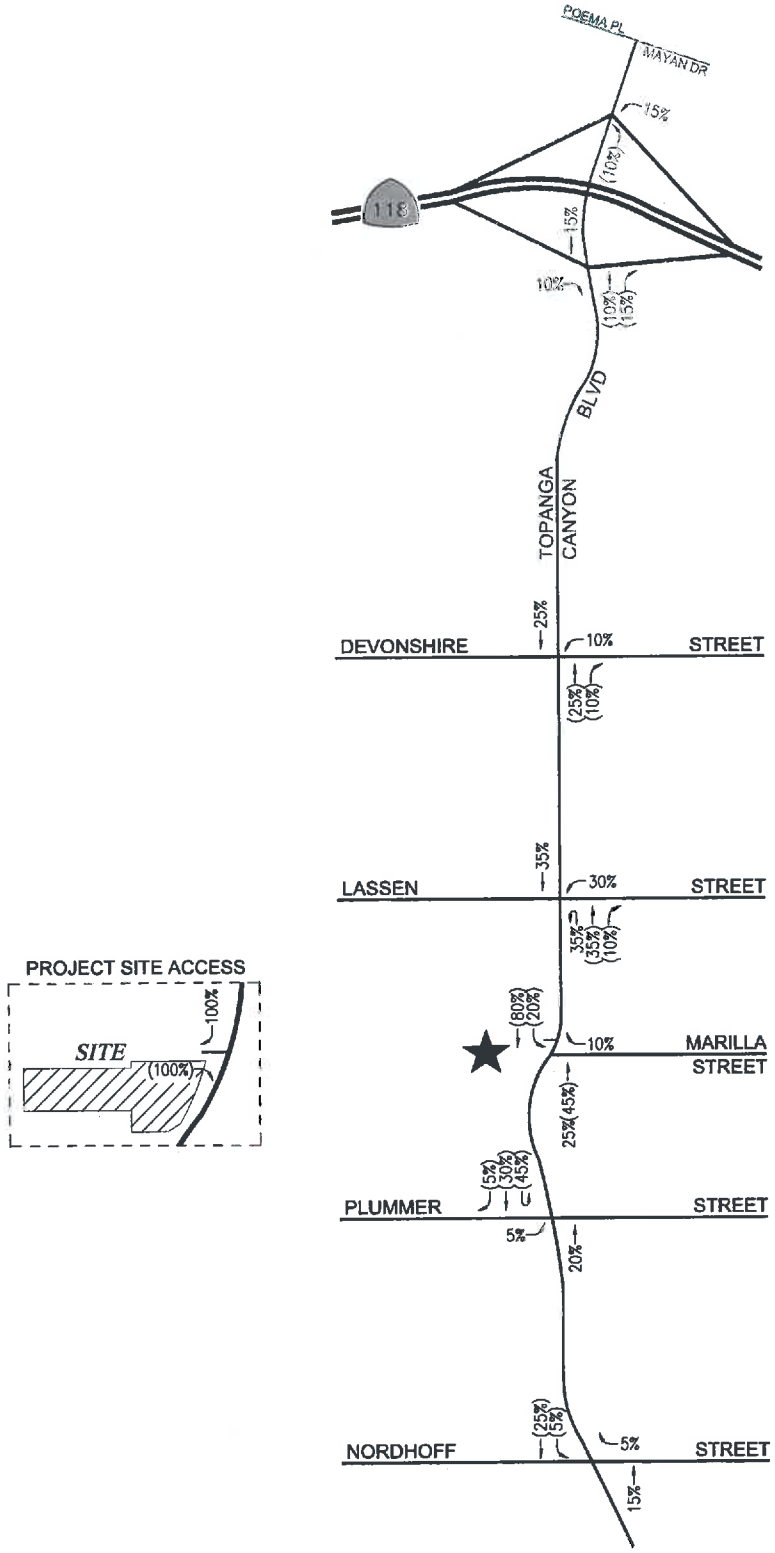
The general, directional traffic distribution patterns for the Project are presented on Figure IV-5. The forecast net new weekday AM and PM peak hour Project traffic volumes at the study intersections associated with the Project are presented on Figure IV-6. The traffic volume assignments presented on Figure IV-6 reflect the traffic distribution characteristics shown on Figure IV-5 and the Project traffic generation forecast presented on Table IV-41.

Existing With Project LOS

As shown in column [2] of Table IV-38, application of the City's threshold criteria to the "Existing With Project" scenario indicates that the Project is not expected to create a significant impact at six of the seven study intersections. As indicated on Table IV-39, a significant traffic impact would occur at the following one intersection:

- Int. No. 4: Topanga Canyon Boulevard / Lassen Street, AM peak-hour *v/c* increases 0.027

Incremental, but not significant, impacts are noted at the other six study intersections due to the Project. The existing with Project traffic volumes at the study intersections during the weekday AM and PM peak hours are illustrated on Figure IV-7.



★ PROJECT SITE
= INBOUND PERCENTAGES
(##) = OUTBOUND PERCENTAGES

NORTH

Not to Scale

Source: Linscott, Law & Greenspan, engineers.

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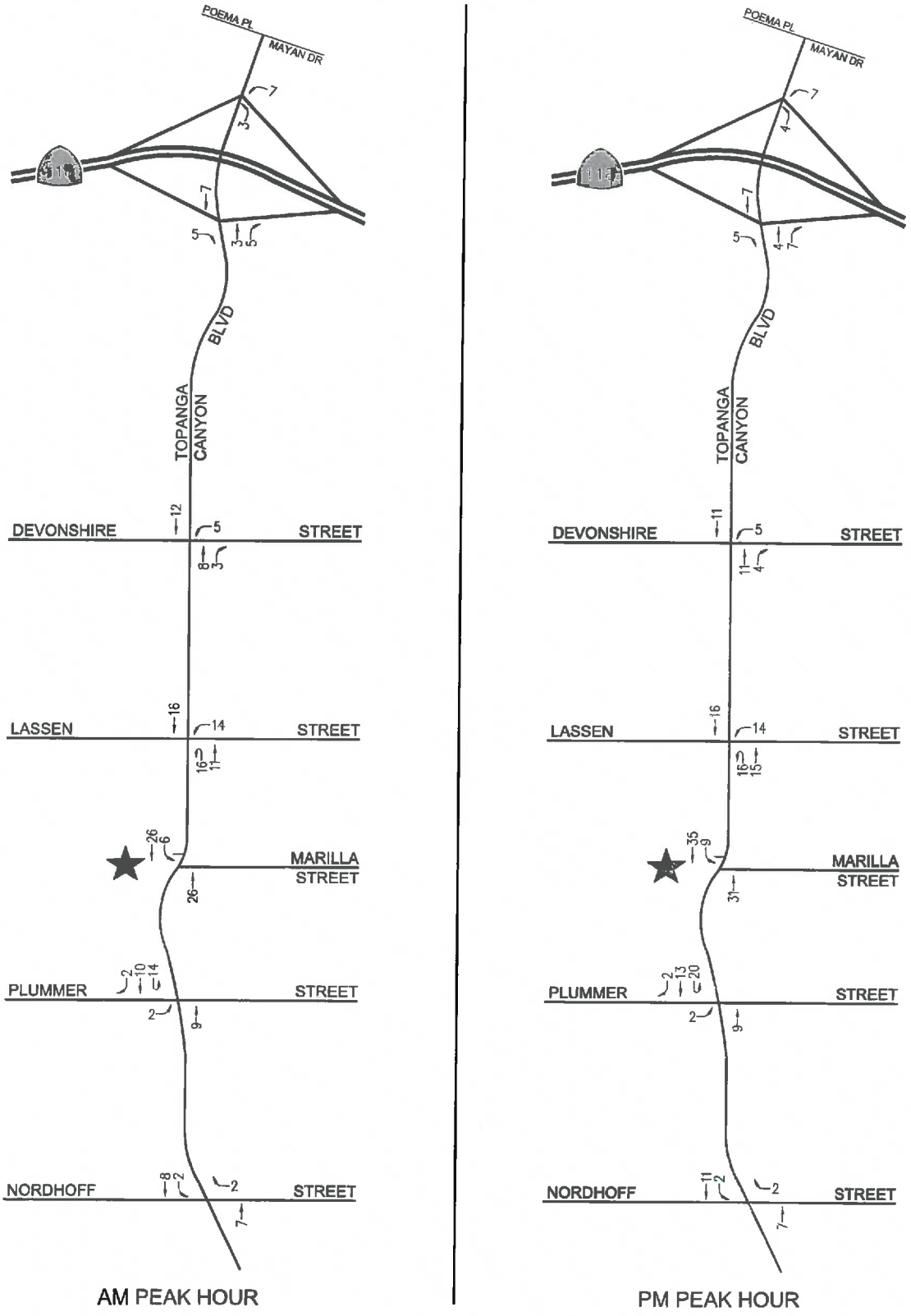
Figure IV-5
Project Traffic Distribution



Source: Linscott, Law & Greenspan, engineers.

Not to Scale

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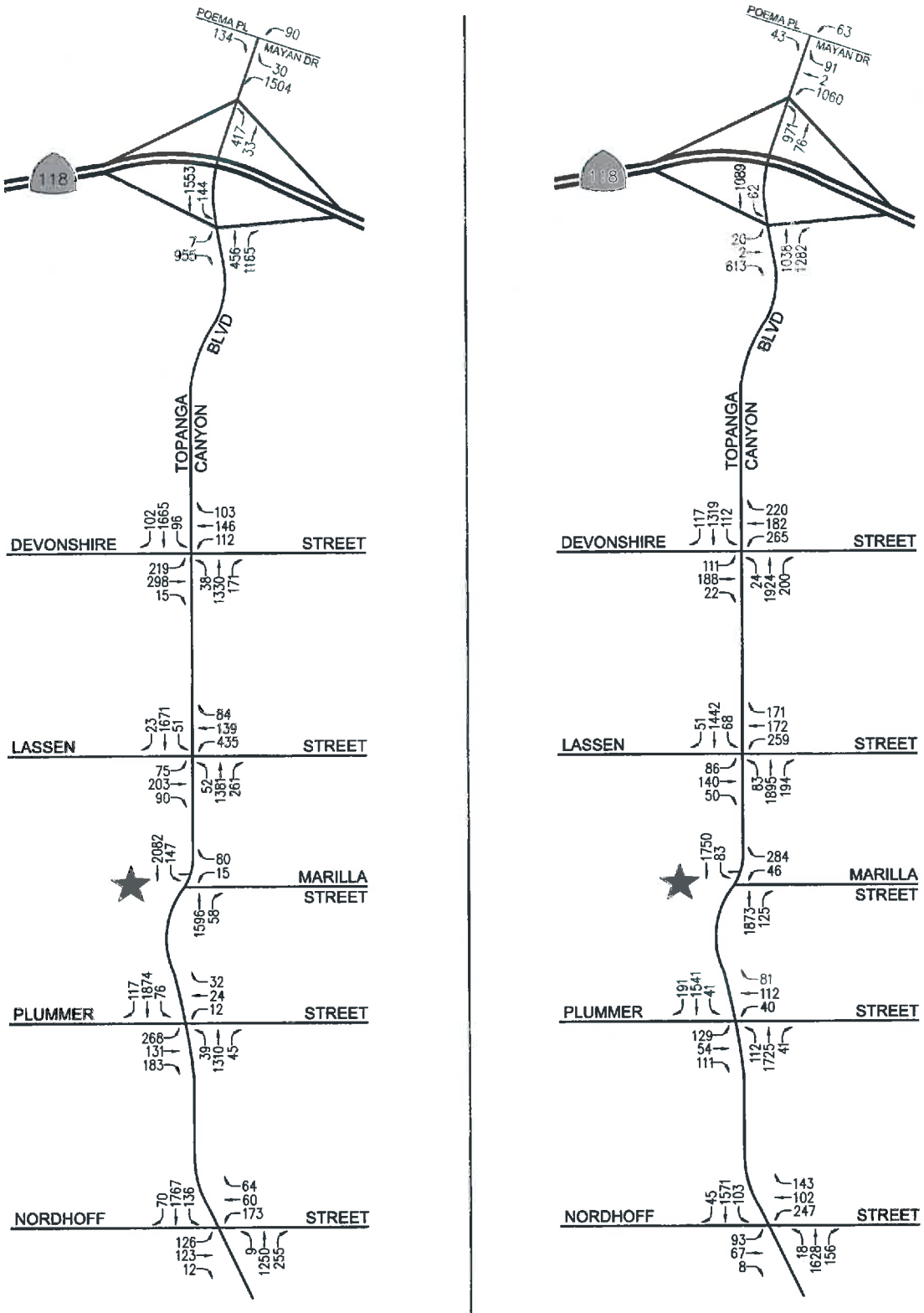
Figure IV-6
Project Traffic Volumes



Source: Linscott, Law & Greenspan, engineers.

Not to Scale

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Figure IV-7
Existing With Project Traffic Volumes

Future Traffic Conditions

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 provide 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 local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such 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.

Related Projects

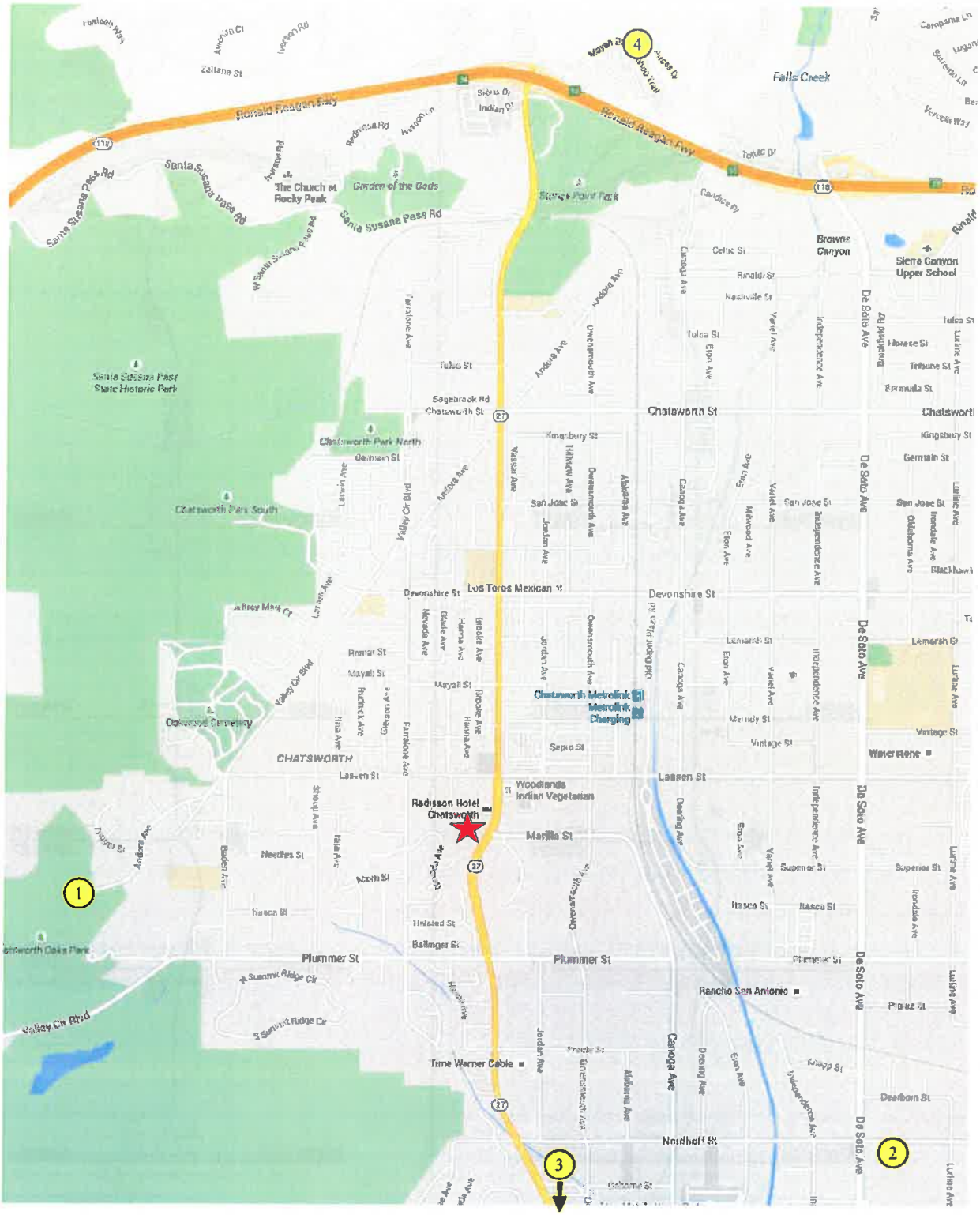
A forecast of on-street traffic conditions prior to occupancy of the Project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area. With this information, the potential impact of the Project can be evaluated within the context of the cumulative impact of all ongoing development. The related projects research was based on information on file at LADOT and City Planning. The list of related projects in the Project site area is presented on Table IV-42. The location of the related projects is shown on Figure IV-8.

Traffic volumes associated with the related projects were calculated using rates provided in the Institute of Transportation Engineers' (ITE) *Trip Generation* manual. The related projects' respective traffic generation for the weekday AM and PM peak hours, as well as on a daily basis for a typical weekday, is summarized on Table IV-42. The distribution of the related projects traffic volumes to the study intersections during the weekday AM and PM peak hours are displayed on Figure IV-9.

Table IV-42
Related Projects List and Trip Generation (1)

Map No.	Project Name/ Project Number	Project Status	Address/ Location	Land Use Data		Project Data Source	Daily Trip Ends (2) Volumes	AM Peak Hour Volumes (2)			PM Peak Hour Volumes (2)		
				Land-Use	Size			In	Out	Total	In	Out	Total
1	TT-53426	Proposed	9503 Andora Avenue	Single Family Homes	45 DU	(3)	431	8	26	34	29	17	46
2	Chatsworth Commerce Center	Under Construction	20842 Nordhoff Street	Retail Retail Industrial	7,000 GSF 10,200 GSF 112,278 GSF		2,573	152	100	252	100	121	221
3	The Village at Westfield Topanga J1016	Under Construction	6600 Topanga Canyon Boulevard	Office Cultural Center Community Center Shopping Center Discount Club Warehouse Fueling Positions Supermarket Cinema Hotel	300,000 GSF 10,000 GSF 5,000 GSF 258,800 GSF 154,355 GSF 20 VFP 35,000 GSF 2,200 GSF 275 GSF	(4)	19,409	623	289	913	887	1,107	1,993
4	Deerlake Ranch Project	Proposed	North of State Route 118, Between Topanga Canyon Boulevard and Canoga Avenue	Single-Family Homes	314 DU	(5)	2,898	68	201	269	188	106	294

(1) Source: City of Los Angeles Department of Transportation Related Projects List.
(2) Trips are one-way traffic movements, entering or leaving.
(3) Source: LADOT Determination Letter for the Proposed Residential Project located at 9503 Andora Avenue, January 1, 2010.
(4) Source: Addendum for Traffic and Parking Analysis for the Village at Westfield Topanga, prepared by Gibson Transportation Consulting, Inc, Revised February 2011.
(5) Source: Traffic Impact Study for the Deerlake Ranch Project, prepared by Linscott, Law & Greenspan, Engineers. July 11, 2002.



MAP SOURCE: RAND MCNALLY & COMPANY

★ PROJECT SITE

(XX) RELATED PROJECT

NORTH

Not to Scale

Source: Linscott, Law & Greenspan, engineers.

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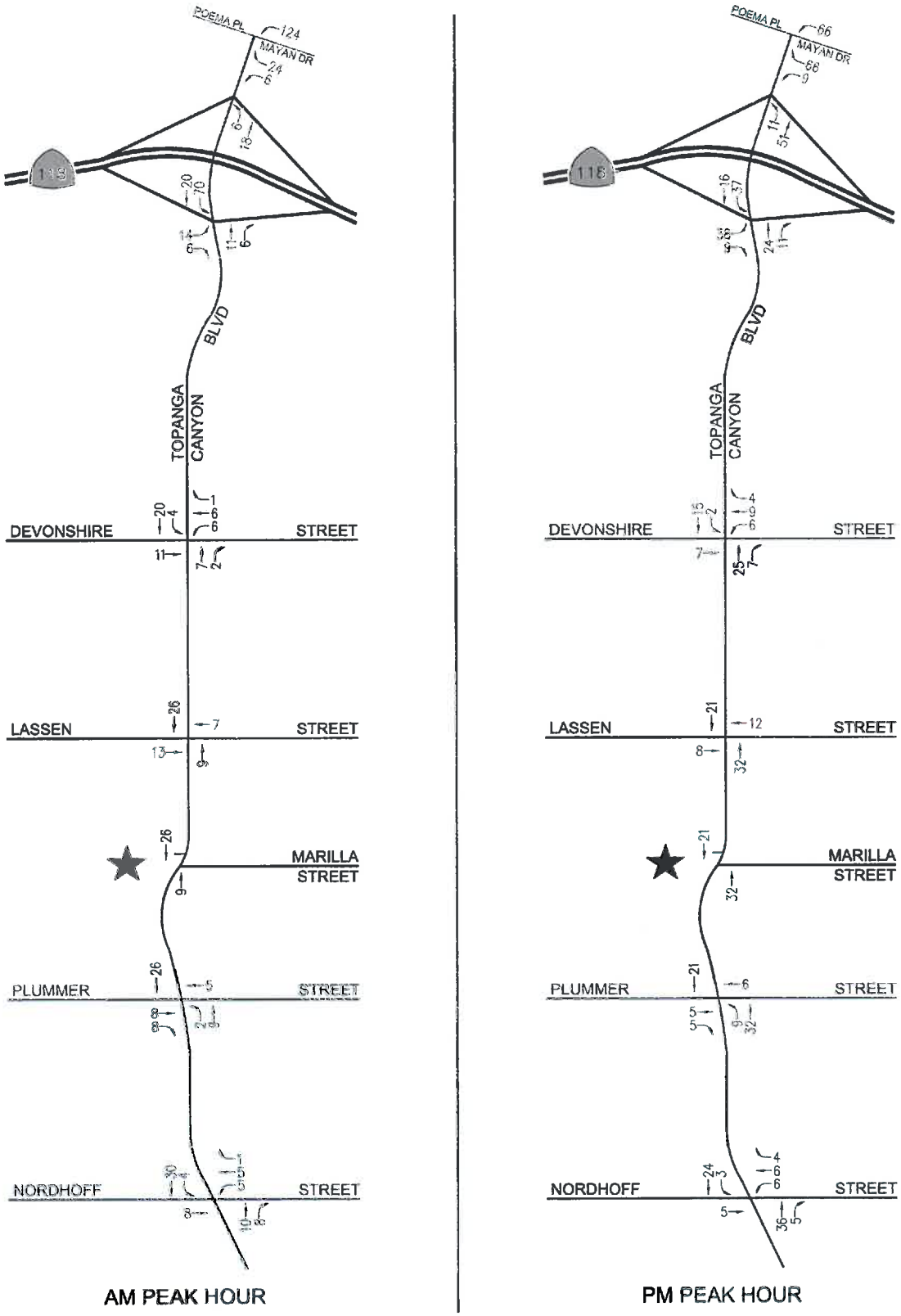
Figure IV-8
Locations of Related Projects



Source: Linscott, Law & Greenspan, engineers.

Not to Scale

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Figure IV-9
Related Projects Traffic Volumes

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 2.0 percent per year to the year 2018 (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 0.54 percent per year between the years 2015 and 2020. Thus, application of an annual growth factor of 2.0 percent allows for a conservative, worst case forecast of future traffic volumes in the area. Further, it is noted that the CMP manual's traffic growth rate is intended to anticipate future traffic generated by development projects in the Project vicinity. Therefore, the inclusion in this traffic analysis of both a forecast of traffic generated by known related projects plus the use of an ambient growth traffic factor based on CMP traffic model data results in a conservative estimate of future traffic volumes at the study intersections.

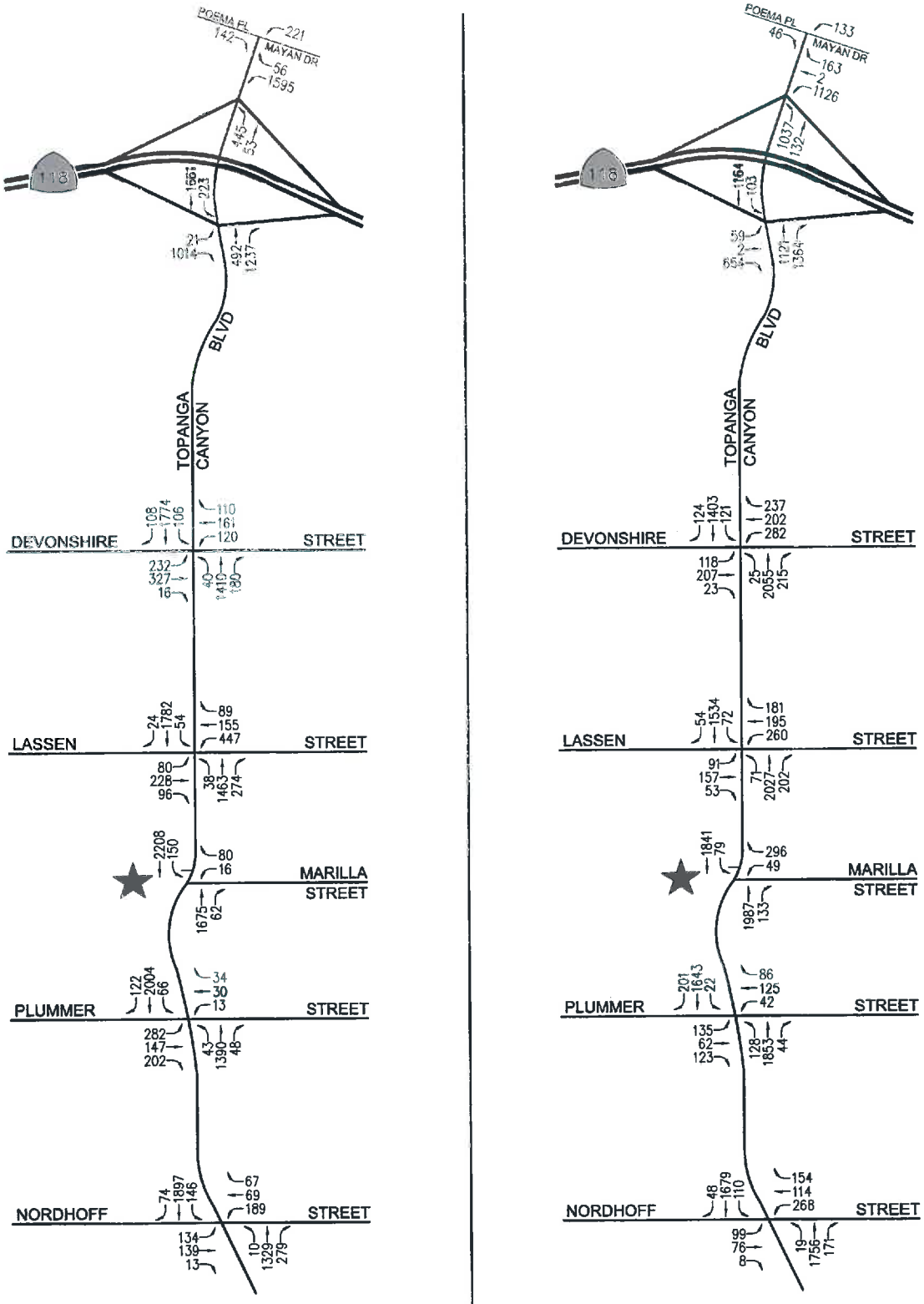
Future Cumulative Baseline Conditions

The future cumulative baseline conditions were forecast based on the addition of traffic generated by the Project plus 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 of the study intersections are incrementally increased with the addition of ambient traffic and traffic generated by the related projects listed on Table IV-42.

As presented in column [3] of Table IV-39, four of seven 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 condition. The following intersections would operate at LOS E or worse during the peak hours shown below under future cumulative baseline conditions:

- Int. No. 2: Topanga Canyon Boulevard / CE-118 EB Ramps
- Int. No. 4: Topanga Canyon Boulevard / Lassen Street
- Int. No. 7: Topanga Canyon Boulevard / Nordhoff Street

The future cumulative baseline (existing, ambient growth and related projects) traffic volumes at the study intersections during the weekday AM and PM peak hours are presented on Figure IV-10.



Source: Linscott, Law & Greenspan, engineers.

Not to Scale

CAJA Environmental Services, LLC

Figure IV-10
Future Cumulative Traffic Volumes

Future Cumulative With Project Conditions

The future cumulative with Project conditions were forecast based on the addition of traffic generated by the Project plus completion and occupancy of related projects. As shown in column [4] of Table IV-39, application of the City's threshold criteria to the "Future With Project" scenario indicates that the Project is not expected to create a significant impact at six of the seven study intersections. As indicated on Table IV-39, a significant traffic impact is expected at the following one intersection:

- Int. No. 4: Topanga Canyon Boulevard / Lassen Street, AM peak-hour *v/c* increases 0.027, PM peak-hour *v/c* increases 0.015

The future cumulative with Project (existing, ambient growth, related projects and Project) traffic volumes at the study intersections during the weekday AM and PM peak hours are illustrated on Figure IV-11.

b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the count congestion management agency for designated roads or highways?

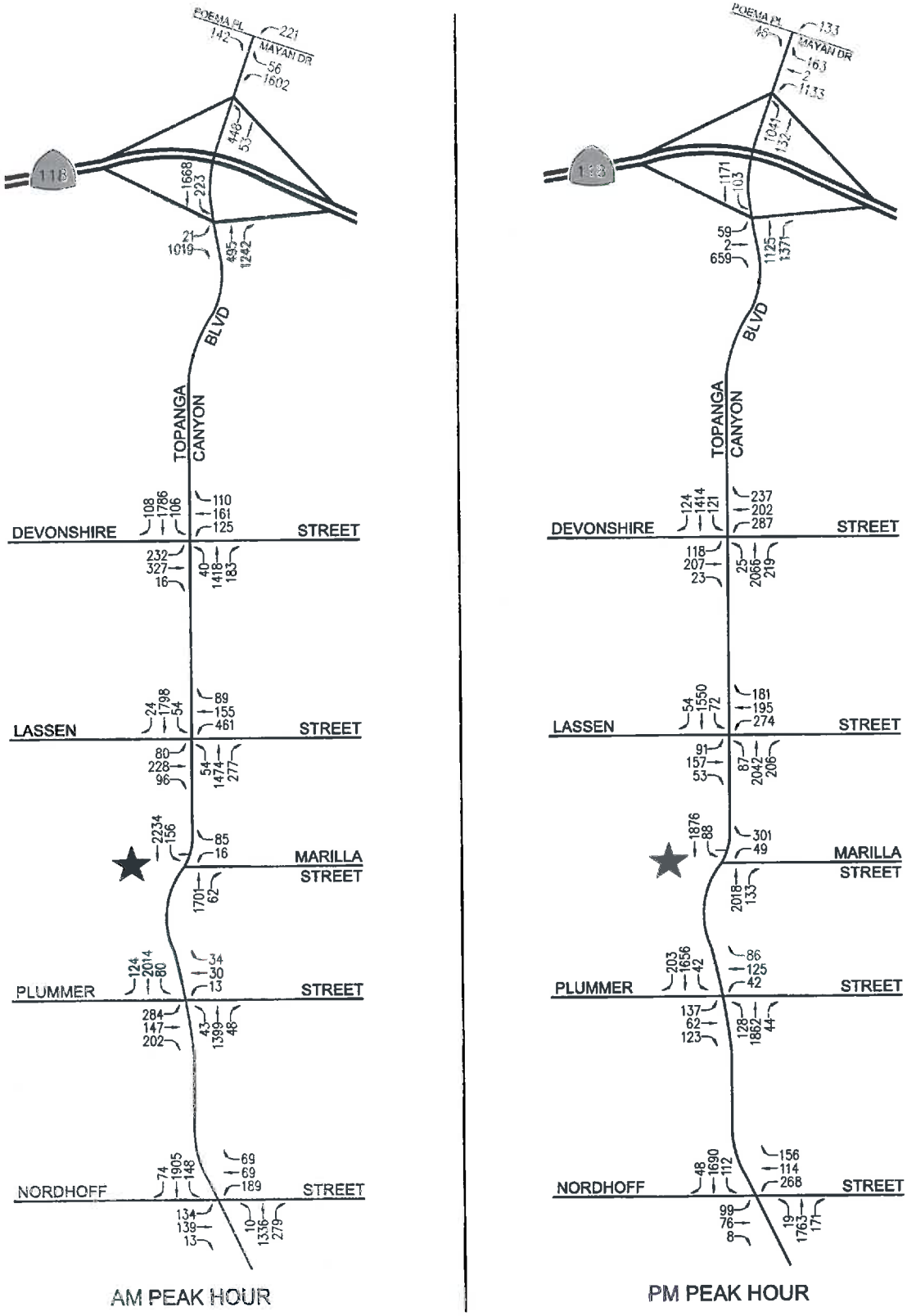
Less Than Significant Impact. The traffic impact guidelines of the 2010 Congestion Management Program (CMP) for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed.

Intersections

The following CMP intersection monitoring locations in the Project site vicinity have been identified:

- No. 64 Topanga Canyon Boulevard / Devonshire Street
- No. 65 Topanga Canyon Boulevard / Roscoe Boulevard
- No. 66 Topanga Canyon Boulevard / Route 118 WB Ramps

The CMP Traffic Impact Analysis (TIA) guidelines require that intersection monitoring locations must be examined if a project will add 50 or more trips during either the AM or PM weekday peak hours. The Project would not add 50 or more trips during either the AM or PM weekday peak hours (i.e., of adjacent street traffic) at the CMP monitoring intersections in the Project site vicinity listed above. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required. No significant impacts related to CMP intersection monitoring locations would occur as a result of the Project.



Source: Linscott, Law & Greenspan, engineers.

Not to Scale

CAJA Environmental Services, LLC

Figure IV-11
Future Cumulative With Project Traffic Volumes

Freeways

The following CMP freeway monitoring locations have been identified in the Project site vicinity:

- No. 1039 SR-101 Freeway at Winnetka Avenue
- No. 1052 SR-118 Freeway at Woodley Avenue

The CMP TIA guidelines require that freeway monitoring locations must be examined if a project will add 150 or more trips (in either direction) during either the AM or PM weekday peak periods. The Project would not add 150 or more trips (in either direction) during either the AM or PM weekday peak hours to CMP freeway monitoring locations listed above Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required. No significant impacts related to CMP freeway monitoring locations would occur as a result of the Project.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The Project includes development of a residential building, reaching approximately 45 feet in height, a height that is within the height range of the existing buildings within the Project area. The Project site is not located near any airports. Thus, the Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. Therefore, no impacts related to this issue would occur.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. In the existing condition, eight driveways are located along Moorpark Street Driveway. As part of the Project, these driveways would be removed and replaced with only three driveways. The sidewalk along Moorpark Street would be continual along the entire Project site frontage. The Project does not include development of any roadways or intersection and would not include the use of farm equipment. Therefore, Project impacts related to hazardous roadway features would be less than significant.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and City Fire Department standards and requirements for design and construction. Therefore, the Project would not result in any significant impacts related to emergency access.

f) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Less Than Significant Impact. As required by the *2010 Congestion Management Program for Los Angeles County*, a review has been made of the potential impacts of the Project on transit service. As discussed, existing transit service is provided in the vicinity of the proposed Chatsworth Hotel Project.

The Project trip generation, as shown on Table IV-40, was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the Project is forecast to generate demand for 4 transit trips during the AM peak hour and 5 transit trips during the PM peak hour. Over a 24-hour period, the Project is forecast to generate demand for 60 daily transit trips. Therefore, the calculations are as follows:

- AM Peak Hour = 78 x 1.4 x 0.035 = 4 Transit Trips
- PM Peak Hour = 89 x 1.4 = 0.035 = 5 Transit Trips
- Daily Trips = 1,209 x 1.4 x 0.035 = 60 Transit Trips

As shown on Table IV-35, three transit lines are within radius the Project site. As outlined on Table IV-37, under the "No. of Buses/Trains During Peak Hour" column, these three transit lines provide services for an average of (i.e., average of the directional number of buses/trains during the peak hours) generally 33 buses/trains during the AM peak hour and 33 buses/trains during the PM peak hour. Therefore, based on the above-calculated AM and PM peak-hour trips, this would correspond to an insignificant number of additional Project-generated transit trips per bus/train. The existing transit service in the Project area would adequately accommodate the increase of Project-generated transit trips. Therefore, Project impacts related to transit would be less than significant.

Mitigation Measures (Transportation/Traffic)

To reduce the Project's traffic impact (Project-specific and cumulative) to less than significant, the mitigation measure is required. As shown in column [5] of Table IV-39, Mitigation Measure 16-1 would reduce the Project's impacts to less than significant at the one impacted intersection (Int. No. 4: Topanga Canyon Boulevard/Lassen Street) during all time periods:

16-1: Topanga Canyon Boulevard / Lassen Street

Prior to issuance of a Certificate of Occupancy, the Project Applicant shall restripe the westbound approach of the Topanga Canyon Boulevard and Lassen Street intersection to convert the existing through lane to a shared left-turn and through lane and shall change the existing traffic signal equipment to accommodate the changed lane configuration.

17. TRIBAL CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Less Than Significant Impact. The Project site is partially improved with a surface parking lot, providing off-site for the existing Radisson Hotel. No significant tribal cultural resources are known to exist at the Project site. As discussed in response to Checklist Question 5(b), based on a records search conducted by the South Central Coast Information Center, one archaeological sites have been recorded within a 0.5-mile radius of the Project site, and no sites have been recorded at the Project site; no resources have been identified at the Project site (refer to Appendix C). However, it is possible that unknown archaeological resources could exist at the Project site that could be encountered within the underlying alluvium, given the relative sensitivity of the Project region. As such, prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project site. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment, in conformance with California Public Resources Code Section 21083.2. Construction activities could continue in other areas of the Project site. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law. Through compliance with these existing regulations, potential Project impacts to unknown archaeological resources would be less than significant.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant With Mitigation Incorporated. Pursuant to AB 52, the Department of City Planning notified Native American tribes as to the Project with a 30-day comment period on April 21, 2016. A letter was received, dated April 29, 2016 from the Fernandeño Tatavian Band of Mission Indians requesting additional information regarding the Project. Later, the Fernandeño Tatavian Band of Mission

Indians requested that an approved Native American Monitor(s) be present during future ground disturbance due to the likelihood of tribal resources to occur within the Project site area. This request has been incorporated as Mitigation Measure 17-1. With implementation of the mitigation measure, Project impacts to tribal cultural resources would be less than significant.

Mitigation Measures (Tribal Cultural Resources)

17-1: Discovery of Tribal Cultural Resources

- Impacts to tribal cultural resources from the Project shall be mitigated through the salvage and disposition of Tribal resources that result from all ground-disturbing activities. Ground-disturbing activities include, but are not limited to, drilling, excavation, and trenching. The Applicant shall retain one Native American Monitor who shall be present during all ground-disturbing activities. Should a Tribal cultural resource be encountered, the project Permittee shall immediately stop all ground disturbance activities, and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project, and (2) a qualified archaeologist who shall assess the find.

- Prior to the issuance of a grading permit, evidence shall be provided to the Department of City Planning that monitor(s) have been obtained; A Native American Monitor shall be secured for each grading unit. In the event that there are simultaneous grading units operating at the same time, there shall be one monitor per grading unit.

- In the event that subsurface archaeological resources, human remains, or other tribal cultural resources are encountered during the course of ground disturbance activities work shall cease in the area of the find until the archaeological or other tribal cultural resources are assessed and subsequent recommendations are determined by a qualified archaeologist. The qualified archaeologist shall specify a radius around where resources were encountered to protect such resources until the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 have been fulfilled. Project activities may continue outside of the designated radius area.

- In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, including the required notification to the County Coroner and the Native American Heritage Commission.

- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC).

18. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable regional water quality control board?

Less Than Significant Impact. The Project Site is located within the service area of the Hyperion Treatment Plant (the "HTP"), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board's (the "LARWQCB") discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity.

The Project would generate a net increase of approximately 13,650 gallons of wastewater per day (or 0.03 mgd) (refer to Table IV-43).[79] With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Table IV-43
Estimated Water Consumption and Wastewater Generation[1]

Land Uses	Size	Water Consumption/ Wastewater Generation Rate[2]	Total (gallons/day)
Hotel	105 rooms	130 gpd/room	**13,650**

[1] *Assumes wastewater generation equals water consumption.*
[2] *Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002. This rate does not assume the effectiveness of any current water conservation measures that are required in the City.*

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. The LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (the "LAAFP") located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 mgd, with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season.

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[79] *This conservatively assumes the Project's wastewater generation would equal its water consumption.*

As shown on Table IV-43, the Project would consume approximately 13,650 gallons of water per day. With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project. Therefore, Project impacts related to water treatment would be less than significant.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. As discussed in response to Checklist Question 9e, the Project would not exceed the capacity of the existing or planning drainage system. Therefore, Project impacts related to stormdrain capacity would be less than significant.

d) Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. As shown on Table IV-43, the Project would consume approximately 13,650 gallons of water per day. According to the Los Angeles Department of Water and Power (LADWP), if a project that is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the most recently adopted Urban Water Management Plan (UWMP), which is prepared by the LADWP to ensure that existing and projected water demand within its service area can be accommodated.[80] As discussed previously in response to Checklist Question 10b, the Project is consistent with the City's General Plan land use designation for the Project site. Additionally, the underlying land use designation and zoning for the Project site could allow development of a 310-room hotel. The Project includes development of a 105-guest-room hotel, substantially smaller than what could be developed at the Project site and which would consume much less water than projected for the site. As such, the Project would not require new or additional water supply or entitlements. Therefore, Project impacts related to water supply would be less than significant.

e) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As discussed in response to Checklist Question 17a, with a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

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[80] *LADWP, 2011 UWMP, page 249.*

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. Forty three percent of the waste generated in the City is disposed of at the Sunshine Canyon City/County Landfill (the "Sunshine Canyon Landfill"), with 20 percent to Chiquita Canyon Landfill, and the remaining amounts sent to over a dozen other landfills, recycling, refuse-to-energy, or resource recovery facilities.[81] According to CalRecycle (California Department of Resources Recycling and Recovery), the Sunshine Canyon Landfill is estimated to close in 2037. It has approximately 96.8 million cubic yards (cy) of remaining capacity out of a total capacity of 140.9 million cy, and a maximum permitted daily intake of 12,100 tons per day (tpd).[82] Sunshine Canyon Landfill accepts approximately 7,800 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).[83] Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 4,300 tpd during each weekday and 9,100 tpd on Saturday.

As shown on Table IV-44 it is estimated the Project would generate a net total of approximately 210 pounds of solid waste per day. This total is a conservative (worst-case scenario) and does not account for the effectiveness of recycling efforts, which the Project would implement.

Table IV-44
Estimated Solid Waste Generation of the Project

Land Use	Size	Solid Waste Generation Rates[1]	Total (lbs/day)
Hotel	105 rooms	2 pounds/day/room	210

[1] *http://www.calrecycle.ca.gov/wastechar/wastegenrates/*

The Sunshine Canyon Landfill can accept 12,100 tpd (and currently accepts 9,000 tpd on weekdays and 3,000 tpd on Saturday), and could therefore accommodate the additional approximately 0.105 tpd increase in solid waste resulting from the Project. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Already in FY 2013, the City achieved a waste diversion rate of 76.40 percent, exceeding the

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[81] *CalRecycle, http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail, hit on December 12, 2015.*

[82] *State of California Department of Resources Recycling and Recovery, Solid Waste Facility Listing/Details Page, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000), website: http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail, December 12, 2015.*

[83] *Sunshine Canyon Landfill Newsletter, Fall 2013, website: http://www.sunshinecanyonlandfill.com/home/newsletter/fall_2013_newsletter.pdf, December 12, 2015.*

required 50 percent diversion rate required by AB 939. The City is on track toward its goal to achieve a 90 percent diversion by 2025.[8485]

The amount of projected waste generation, diversion, and disposal during operation of the Project, considering recycling features that could reduce the waste generation rates would comply with all federal, state and local statutes, ordinances, policies and objectives. The Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and would not require an additional solid waste collection route or recycling or disposal facility. Thus, operation of the Project would not require the need for additional landfill capacity. Therefore, the impact associated with solid waste during operation of the Project would be less than significant.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. The Project would be required to comply with all applicable federal, state, and local statutes and regulations, including the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance related to solid waste generation, and no significant impacts related to this issue would occur.

19. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant With Mitigation Incorporated. For the reasons stated in this Initial Study, with implementation of mitigation measures identified in this Initial Study, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable

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[84] *Waste Diversion Rate: http://lacitysan.org/solid_resources/recycling/.*

[85] *City of Los Angeles, Department of Public Works, A Five-Year Strategic Plan, Fiscal Years 2012/13-2016/17: http://lacitysan.org/general_info/pdfs/Strategic_Plan_12-13.pdf, January 6, 2014.*

when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant With Mitigation Incorporated. A significant impact could occur if the Project, in conjunction with the related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together. Although related projects may be constructed in the Project site vicinity, the cumulative impacts to which the Project would contribute would be less than significant. Implementation of the mitigation measures identified would reduce the Project's contribution to any cumulative impacts to less than considerable.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant With Mitigation Incorporated. A significant impact could occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. All potential impacts of the Project have been identified, and mitigation measures have been prescribed, where applicable, to reduce all potential impacts to less than significant. Upon implementation of mitigation measures identified and compliance with existing regulations, the Project would not have the potential to result in substantial adverse impacts on human beings either directly or indirectly.

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