LOS ANGELES DEPARTMENT OF CITY PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

De Soto/Burbank Master Plan Project

Case Number: ENV-2017-1706-MND

Project Location: **20920 – 21051 Warner Center Lane & 20931 – 20971 Burbank Boulevard, Woodland Hills, CA 91367**

Community Plan Area: Canoga Park – Winnetka – Woodland Hills – West Hills

Council District: 3 – Blumenfield

Project Description: The Applicant proposes to develop the Project, which would be developed on an approximately 24.4-acre site located in the northwest quadrant of the intersection of De Soto Avenue and Burbank Boulevard (Project Site), in the Woodland Hills community of the City of Los Angeles (City). The Project Site is currently improved with a contemporary corporate office park (known as Warner Center Corporate Park), consisting of 12 low-rise commercial structures (Existing Buildings), each on a distinct parcel, ranging in height from one to three stories, supported by surrounding surface parking lots. The Existing Buildings include approximately 340,339 square feet of floor area.

The Project is located within the Commerce District of the Warner Center 2035 (WC2035) Plan Area and includes the phased demolition of the Existing Buildings and other improvements and the phased construction of a mixed-use development consisting of ten new buildings (New Buildings), varying in height from approximately 35 feet (two stories) to 350 feet (24 stories) in height. The Project would be constructed in eight phases and includes a total of approximately 2,634,268 square feet of floor area, with approximately 1,175,513 square feet of residential floor area (approximately 45 percent of the total floor area) and approximately 1,458,755 square feet of non-residential floor area, consisting of office, retail and hotel uses (approximately 55 percent of the total floor area). The Project's residential uses consist of approximately 1,009 multi-family units, including 841 apartment units (approximately 53 of which will be Work-Live Units, as defined in Section 4 of the WC2035 Plan) and approximately 168 condominium units (approximately 15 of which will be Work-Live Units). The Project's non-residential uses include approximately 1,140,746 square feet of office space, approximately 7,731 square feet of ground-floor restaurant space, approximately 15,741 square feet of ground-floor retail space, approximately 35,311 square feet of ground-floor restaurant and/or retail space, approximately 26,762 square feet of ground-floor office and/or retail space, approximately 4,068 square feet of community space, and an approximately 157,535 square-foot hotel with 228 hotel rooms. The overall floor area ratio (FAR) for the Project is 2.52:1.

Project parking would be provided within subterranean and podium levels beneath and within nine of the ten New Buildings. No stand-alone parking structures are proposed. Upon Project completion, onsite parking structures would provide 1,627 residential spaces and 3,921 non-residential spaces, for a total of 5,548 parking spaces. The Project also includes 870 long-term bicycle parking spaces and 264 short-term bicycle spaces, for a total of 1,134 bicycle parking spaces. In addition, a minimum of 280 parking spaces for motorcycles/scooters will be included as part of the Project.

The Project would be accessible from both Burbank Boulevard to the south and De Soto Avenue to the east. Vehicle access to the parking structures would be provided by an updated internal roadway network. Primary access through the Project Site would be provided by Warner Center Lane, which is a private street that would be reconfigured on a phased basis as part of the Project and qualifies as a "New Street" under the WC2035 Plan. Warner Center Lane would connect to two driveways – Commerce Drive to the west and Town Center Drive to the north. The internal circulation system also includes Adler Drive, a third driveway that would be directly accessible from Burbank Boulevard and Commerce Drive.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
ESA

APPLICANT:
LLJ Adler WCCI, LLC and LLJ Adler WCCII, LLC

December 2019

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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 360, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
AND CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
Department of City Planning	3	December 19, 2019

RESPONSIBLE AGENCIES

City of Los Angeles Department of City Planning, South Coast Air Quality Management District, Los Angeles Building and Safety Department, Los Angeles Department of Public Works

PROJECT TITLE/NO.	CASE NO.
De Soto/Burbank Master Plan Project	ENV-2017-1706-MND

PREVIOUS ACTIONS CASE NO.	
n/a	☐ DOES have significant changes from previous actions. ☐ DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION

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ENVIRONMENTAL SETTING

The Project Site is currently developed with as Warner Center Corporate Park (Corporate Park), a commercial office park consisting of 12 low-rise office buildings constructed between 1981 and 1984, surface parking lots, and associated landscaping. The 12 office buildings are between one and three stories in height, and contemporary in design. Tenants of the Corporate Park include the U.S. Bankruptcy Court and a range of commercial establishments including but not limited to Adler Realty Investments, Inc., Farmers Insurance, Revolution Media, and Girls Scouts LA.

Vehicle access to the office buildings on the Project Site is provided via driveways on Warner Center Lane, a private drive that traverses the Corporate Park and terminates at stop controlled intersections at Burbank Boulevard and De Soto Avenue. Warner Center Lane provides a single travel lane and shoulder parking in each direction. Regional access to the Project Site is provided by the Ventura Freeway, approximately one-half mile south of the Project Site and accessed by Topanga Canyon Boulevard and De Soto Avenue.

PROJECT LOCATION

The Project Site is located at the northwest corner of Burbank Boulevard and De Soto Avenue, in the Warner Center 2035 Plan area (Commerce District).

PLANNING DISTRICT		**STATUS:**
Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan		☐ **PRELIMINARY** ☐ **PROPOSED** _____ ☒ **ADOPTED**
EXISTING ZONING	**MAX. DENSITY ZONING**	
Warner Center Specific Plan (WC)	Floor-to-Area Ratio (FAR) of 4.5:1 and graduated FAR	☒ **DOES CONFORM TO PLAN**
GENERAL PLAN LAND USE & ZONE(S)	**MAX. DENSITY PLAN**	
Limited Industrial; CO (WC)-SN	3:1	☐ **DOES NOT CONFORM TO PLAN**
SURROUNDING LAND USES	**PROJECT DENSITY**	
See above Environmental Setting discussion and Attachment A, Project Description	2.52:1	☐ **NO DISTRICT PLAN**

☞ 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.

☒ 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 unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on 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 onsite, 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 that 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 Section XVII, "Earlier Analysis," 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:

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

    2) 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.

    3) 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:

    1) The significance criteria or threshold, if any, used to evaluate each question; and

    2) 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 one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

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

☞ **BACKGROUND**

PROPONENT NAME	**PHONE NUMBER**
LLJ Adler WCCI, LLC and LLJ Adler WCCII, LLC Michael Adler	(818) 884-2200
PROPONENT ADDRESS 21031 Warner Center Lane, Suite C, Woodland Hills, California 91367	
AGENCY REQUIRING CHECKLIST Department of City Planning	**DATE SUBMITTED** December 19, 2019
PROPOSAL NAME (If Applicable) De Soto/Burbank Master Plan 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 daytime or nighttime views in the area?	☐	☒	☐	☐
2.	**AGRICULTURAL AND FORESTRY RESOURCES —** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement 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 (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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***
3.	**AIR QUALITY —** Where available, 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 Air Quality Management Plan or Congestion Management Plan?	☐	☐	☒	☐
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM_{10}, and $PM_{2.5}$) under an applicable federal or state ambient air quality standard?	☒*	☐	☐	☐
d)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☒	☐
e)	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
4.	**BIOLOGICAL RESOURCES —**				
	Would the project:				
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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 local or regional plans, policies, regulations or 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 a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	☐	☒	☐	☐

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***
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
5.	**CULTURAL RESOURCES — Would the project:**				
a)	Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines §15064.5?	☐	☐	☒	☐
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?	☐	☒	☐	☐
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
6.	**GEOLOGY AND SOILS — Would the project:**				
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii)	Strong seismic ground shaking?	☐	☒	☐	☐
iii)	Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv)	Landslides?	☐	☐	☒	☐
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 wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

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***
7. GREENHOUSE GAS EMISSIONS — Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒*	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒*	☐	☐	☐
8. HAZARDS AND HAZARDOUS MATERIALS — Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code 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?	☐	☐	☐	☒

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***
9. HYDROLOGY AND WATER QUALITY — Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering 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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
10. LAND USE AND LAND USE 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?	☐	☐	☐	☒

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***
11. MINERAL RESOURCES — Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
12. NOISE — Would the project 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?	☐	☐	☐	☒
f) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
13. POPULATION AND HOUSING — Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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***
14. PUBLIC SERVICES				
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 following public services:				
a) Fire protection?	☐	☒	☐	☐
b) Police protection?	☐	☒	☐	☐
c) Schools?	☐	☒	☐	☐
d) Parks?	☐	☒	☐	☐
e) Other public facilities?	☐	☒	☐	☐
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 facilities would occur or be accelerated?	☐	☒	☐	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
16. TRANSPORTATION/TRAFFIC — Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒

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***
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?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐
g) Result in inadequate parking capacity?	☐	☐	☒	☐
17. TRIBAL CULTURAL RESOURCES – The evaluation of potential impacts on tribal cultural resources consists of two parts: (1) identification of tribal cultural resources within the project site or immediate vicinity through AB 52 consultation and the review of pertinent records and literature, and (2) a determination of whether the project may result in a "substantial adverse change" in the significance of any identified resources. In accordance with Appendix G, the Project would have a significant impact related to Cultural Resources if it would:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐
18. UTILITIES AND SERVICE SYSTEMS — Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐

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***
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☒	☐	☐
c)	Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☒	☐	☐
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☒	☐	☐
e)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☒	☐	☐
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☒	☐	☐
g)	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☒	☐	☐
19.	**ENERGY –** In accordance with Appendix F of the State CEQA Guidelines, the City has determined that the Project would have a significant impact with regard to energy if the project would:				
a)	Conflict with an adopted energy conservation plan?	☐	☒	☐	☐
b)	Violate State or federal energy standards?	☐	☐	☒	☐
c)	Cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation?	☐	☐	☒	☐
d)	Result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
20.	**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?	☐	☐	☒	☐

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***
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?	☐	☐	☒	☐

*As previously determined in the WC2035 Plan Final EIR.

☞ **DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)**

PREPARED BY	**TITLE**	**TELEPHONE #**	**DATE**
Heidi Rous ESA 80 South Lake Avenue, Suite 570 Pasadena, CA 91101	Director	(626) 204-6170	December 19, 2019

INTRODUCTION

1. Tiered Initial Study

LLJ Adler WCCI, LLC and LLJ Adler WCCII, LLC (collectively, Applicant) propose to develop the De Soto/Burbank Master Plan Project (Project), a multi-phase, master-planned, mixed-use development on the approximately 24.4-acre Project Site. The Project Site is located within the area governed by the Warner Center 2035 Specific Plan (WC2035 Plan), which became effective on December 25, 2013. The WC2035 Plan replaced the prior 1993 Warner Center Specific Plan and established new districts, use and development standards, mobility requirements and urban design guidelines for Warner Center. A Final Environmental Impact Report was prepared with respect to the WC2035 Plan (ENV-2008-3471-EIR; SCH No. 1990011055), which was certified by the Los Angeles City Council on October 23, 2013 (WC2035 Plan FEIR) (Council File No. 13-0197). The WC2035 Plan FEIR is available for public review at the Department of City Planning's Valley Office (6262 Van Nuys Boulevard, Van Nuys, CA 91401) or on the Department of City Planning's website:

https://planning.lacity.org/eir/WarnerCntrRegionalCore/FEIR/WarnerCenter_FEIR.pdf.

As discussed in more detail below, this Tiered Initial Study (Tiered IS) has been prepared for the proposed Project to determine whether the Project may cause significant effects on the environment that were not adequately addressed in the WC2035 Plan FEIR, in accordance with Section 21094(c) of the California Public Resources Code, which is a provision of the California Environmental Quality Act (CEQA) (California Public Resources Code §§21000 et seq., CEQA), and Section 15152(f) of the State CEQA Guidelines (Title 14, California Code of Regulations, Sections 15000 et seq.).

2. WC2035 Specific Plan and FEIR

The 924-acre WC2035 Plan area is located in the southwestern San Fernando Valley, within the Warner Center area of the City of Los Angeles (City). The WC2035 Plan area is intended for development as an urban transit-oriented district (TOD) in a portion of the City's Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan area. The WC2035 Plan area is bounded generally by the Los Angeles River to the north, the Ventura Freeway to the south, De Soto Avenue to the east, and Topanga Canyon Boulevard to the west. The western border of the WC2035 Plan area extends variably up to 500 feet west of Topanga Canyon Boulevard. In January 2008, it contained an estimated 6,200 residential units, 16.1 million square feet of non-residential (office,

industrial, retail, hotel, hospital, school, etc.) floor area, 13,950 residents, 39,599 employees, and a floor-area ratio (FAR) of 0.66:1 (WC2035 Plan DEIR, pp. ES-1-2, Table ES-1).

The Project is subject to the development standards and other requirements in the WC2035 Plan, which modified the types of uses and permitted development densities in the WC2035 Plan area. The WC2035 Plan allows a balanced mix of uses, with a concentration of employment and housing opportunities to support a sustainable regional center. Several characteristics were identified to attract the desired development for the WC2035 Plan area to support the balanced mix of uses, including providing a variety of job types, a range of housing options, a mix of regional and local-serving retail, and providing entertainment and recreational facilities that can all be within walking distance or accessed by convenient public transportation options.

The WC2035 Plan subdivides the WC2035 Plan area into eight districts (i.e., subareas), specifies permitted land uses and development standards for each district, and includes a set of urban design guidelines for development. A minimum percentage of land uses in each district is assumed to be devoted to non-residential uses, allowing development to occur based on market demand, while ensuring the availability for an appropriate mix of uses in the future.

3. Tiering Process

This Tiered IS is tiered from the WC2035 Plan FEIR, in accordance with Section 21094 of the California Public Resources Code and Section 15152 of the State CEQA Guidelines. The WC2035 Plan FEIR evaluated the environmental impacts associated with a specified level of development under the WC2035 Plan through the year 2035 planning horizon. The WC2035 Plan FEIR recommends mitigation measures that are intended to mitigate the identified significant impacts associated with the assumed level of buildout under the WC2035 Plan. The WC2035 Plan FEIR also recommends project-specific mitigation measures to mitigate project-level significant impacts.

Tiering under CEQA involves the preparation of multiple CEQA documents for a sequence of actions so that the later CEQA document incorporates and builds on the information provided in a "first-tier" environmental impact report (EIR). Put another way, tiering refers to using the analysis of general matters contained in a broader EIR, including one prepared for a specific plan, with later EIRs or negative declarations on narrower projects, incorporating by reference to general discussions from the broader EIR and concentrating the later CEQA documents solely on the issue specific to the later project (State CEQA Guidelines § 15152(a)).

Tiered CEQA documents eliminate the repetitive evaluation of the same environmental issues that were adequately addressed in the first-tier EIR. Section 15152(b) of the State CEQA Guidelines encourages the tiering of environmental documents, thereby streamlining the environmental review process for specific development projects, as follows:

> *Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including…development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is*

> *from an EIR prepare for a general plan, policy or program to an EIR or negative declaration…to a site-specific EIR or negative declaration.*

Section 15152(d) of the State CEQA Guidelines explains how later environmental documents should be limited in scope:

> *Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which: (1) were not examined as significant effects on the environment in the prior EIR; or (2) are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by imposition of conditions, or other means.*

A second-tier EIR will be required for the later development project if the project may cause significant effects on the environment that were not adequately addressed in the prior, first-tier EIR. (State CEQA Guidelines § 15152(f)). Significant environmental effects have been "adequately addressed" if the lead agency determines that (1) they have been mitigated or avoided as a result of the prior EIR and findings adopted in connection with that prior EIR, (2) they have been examined at a sufficient level of detail in the prior EIR to enable those effects to be mitigated or avoided by site-specific revisions, imposition of conditions, or by other means in connection with the approval of the later project, or (3) they would not be susceptible to substantial mitigation or avoidance (Cal. Pub. Res. Code § 21068.5, State CEQA Guidelines § 15152(f)(3)). This is consistent with the statutory direction that duplicative analysis of environmental impacts examined in a prior EIR be excluded from a second-tier CEQA document (Cal. Pub. Res. Code § 21093).

If an initial study determines that the later development project will not cause any significant effects on the environment that were not adequately addressed in the prior, first-tier EIR, then a negative declaration shall be required pursuant to State CEQA Guidelines Section 15070. If the initial study identifies potentially significant effects that were not adequately addressed in the prior, first-tier EIR, but (1) revisions in the project made by or agreed to by the applicant before the initial study and proposed mitigated negative declaration are released for public review would avoid the effects or mitigate the effects to a point were clearly no significant effects would occur and (2) there is no substantial evidence that the project as revised may have a significant effect on the environment, then a mitigated negative declaration shall be required pursuant to State CEQA Guidelines Section 15070. (State CEQA Guidelines §15152 (f)).

The environmental review for the proposed Project, as presented in this Tiered IS, will rely on, and tier off of, the WC2035 Plan FEIR with respect to the following:

- A discussion of general background and setting information for environmental topic areas.
- Overall growth-related issues, including issues that are not specific to the proposed Project.
- Environmental topics and issues that were adequately addressed or otherwise evaluated in sufficient detail in the WC2035 Plan FEIR.
- Mitigation measures identified in the WC2035 Plan EIR that apply in whole or in part to the proposed Project.

- Cumulative impacts.

This Tiered IS has been prepared to comply with CEQA and the State CEQA Guidelines with respect to the Project. Based on the tiering framework described above, this Tiered IS will focus on project-specific impacts and issues in order to determine whether the proposed Project may cause any significant effects on the environment that were not adequately addressed in the WC2035 Plan FEIR. This will entail the analysis of some of the Project's site-specific impacts that could not be addressed in the WC2035 Plan FEIR because specific details regarding the Project were not available at the time the WC2035 Plan FEIR was prepared. The WC2035 Plan FEIR is hereby incorporated by reference into this Tiered IS pursuant to Section 15150 of the State CEQA Guidelines.

As demonstrated in Attachment B, Explanation of Checklist Determinations, of this Tiered IS, which provides an evaluation of each environmental impact area, the Project would not result in any significant impacts on the environment that were not adequately addressed in the WC2035 Plan FEIR.

4. Project Relationship to WC2035 Plan and WC2035 Plan FEIR

The proposed Project has been designed to comply with all applicable development standards and urban design guidelines in the WC2035 Plan, as well as fulfill the WC2035 Plan's vision to create an "urban center where people can live, work and play" and a "vibrant Transit Oriented District area based on sustainability, community connectedness, accessible public transit, and promotion of innovative businesses, job diversity, and safe and friendly pedestrian environment, " and "to help to concentrate a mix of uses that are within walking distance to one another so people can easily walk rather than drive."

The entire WC2035 Plan area, including the Project Site, has a land use designation of "Regional Center Commercial" in the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan and has a zoning designation of "Warner Center (WC)". The Project Site is located within the Commerce District, one of eight zoning districts established in the WC2035 Plan. The Commerce District is intended to accommodate new residential opportunities, including work-live uses, while retaining some of its historical light industrial land uses. According to the WC2035 Plan (Section 6.1.2.2), the Commerce District is intended to be the most "jobs-rich" district, and it is intended to provide flexible employment uses with some associated retail uses. Commercial and industrial land use potential is to be maintained at the ground floor throughout the District. A range of land uses is therefore permitted in the Commerce District, including the following: work-live units; multi-family residential dwelling units; certain industrial, manufacturing and research and development uses; hybrid industrial uses; specific service industry and office uses; retail stores; and restaurants. The WC2035 Plan established a maximum floor area ratio (FAR) of 4.5:1 for lots within the Commerce District, together with a graduated FAR requirement that defines the minimum allowable non-residential floor area in order to maintain a districtwide balance between commercial and residential development. Building height within the Commerce District is mostly unlimited, with some exceptions.

The proposed land uses (i.e., residential, work-live, commercial office, retail, restaurant and hotel) and physical and operational characteristics of the Project are consistent with the applicable development standards and requirements in the WC2035 Plan, including proposed uses, the graduated FAR requirement for the proportion of residential to non-residential uses, development envelope, building heights, design standards, setbacks, parking and open space requirements in the Commerce District.

It is important to note that the WC2035 Plan FEIR assumed a level of development for the Project Site that exceeds the development intensity associated with the proposed Project. Specifically, the environmental analyses in the WC2035 Plan FEIR assumed development at an overall 3:1 FAR throughout the WC2035 Plan area. By comparison, the overall FAR for the Project is only 2.52:1. Therefore, (1) the Project is consistent with the development assumption in the WC2035 Plan FEIR and (2) the environmental impacts identified in the WC2035 Plan FEIR, as they relate to the Project Site, substantially exceed the Project's actual environmental impacts.

Mitigation measures recommended in the WC2035 Plan FEIR that are applicable to the proposed Project are presented in this Tiered IS with respect to certain environmental topics. Those mitigation measures are initially reproduced verbatim as presented in the WC2035 Plan FEIR, while they are non-substantively modified at the end of specified sections to conform to the Project and account for the fact that the Project includes multiple phases and to correct typographical and other errors.

This is consistent with Section 5.3, Development Review Process–Project Permit Compliance of the WC2035 Plan, which states:

> *Project Permit Compliance: All Projects (as such term is defined in Section 4 of this Plan, which definition excludes those activities listed below in Sections 5.3.1.1 through 5.3.1.9, inclusive) that are not subject to the Administrative Clearance process shall be subject to the Project Permit Compliance process set forth in Los Angeles Municipal Code (LAMC) Section 11.5.7. A Project Permit Compliance is discretionary in nature and is reviewed in accordance with LAMC Section 11.5.7. Prior to any Project Permit Approval, the Director shall impose any mitigations resulting from identified impacts in a Project specific environmental analysis. Prior to any Project Permit Approval, the Director shall consult with Appendix C (Mitigation Measures Table) and shall impose any mitigations, which apply to the specific Project or, alternatively, if a Project prepares its own Project level environmental review, then the mitigations measures from that environmental analysis and review are applicable to that Project.*

5. Public Review and Comment Period

The Tiered IS will be circulated for public review and comment from December 19, 2019 to January 17, 2020, for a period of 30 days. The Tiered IS will be available for public review online at https://planning.lacity.org/development-services/negative-declaration-public-notices. Comments made on this Tiered IS must be received by 5:00 pm on January 17, 2020. Comments can be emailed to tim.fargo@lacity.org.

6. Document Organization

The Tiered IS includes this Introduction, the CEQA Environmental Checklist, attachments, and appendices, as follows:

Introduction. This section provides a summary of the Project, describes the CEQA tiering process, explains how and the extent to which the environmental analyses in the Tiered IS will rely on and incorporate the environmental analysis in the WC2035 Plan FEIR and summarizes the organization of the Tiered IS.

CEQA Environmental Checklist. This section contains the City's CEQA Initial Study Checklist, including a brief project description, zoning information, lead agency signatures, and a checkbox summary of impact significance for all environmental topics.

Attachment A: Project Description. This section describes the location, objectives, and physical and operational characteristics of the Project. This section presents an overview of the Project's environmental setting, including onsite and surrounding land uses.

Attachment B: Explanation of Checklist Determinations. This section contains the environmental setting, regulatory framework, methodology, thresholds of significance, project characteristics and/or project design features, project-specific and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the following environmental issues: (1) Aesthetics – Visual Character, Views, Light and Glare, Shading; (2) Agriculture and Forest Resources; (3) Air Quality; (4) Biological Resources; (5) Cultural Resources – Archaeological and Paleontological Resources, Historical Resources; (6) Geology and Soils; (7) Greenhouse Gas Emissions; (8) Hazards and Hazardous Materials (including Wildfire); (9) Hydrology and Water Quality; (10) Land Use and Planning; (11) Mineral Resources; (12) Noise and Vibration; (13) Population, Housing, and Employment: (14) Public Services – Fire Protection, Police Protection, Schools, Parks, Libraries; (15) Recreation; (16) Transportation and Traffic; (17) Tribal Cultural Resources; (18) Utilities and Service Systems – Water Supply, Wastewater, Solid Waste; (19) Energy; and (20) Mandatory Findings of Significance.

References: A comprehensive list of references cited in this Tiered IS.

The Environmental Analyses in this Tiered IS are supported by the following appendices:

Appendix A – Air Quality – CalEEMod Output Files

Appendix B – Tree Survey

Appendix C – Cultural Resources Assessment (CONFIDENTIAL)

Appendix D – Paleontological Resources Assessment (CONFIDENTIAL)

Appendix E – Geotechnical Reports

Appendix F – Greenhouse Gas Emissions – CalEEMod Output Files

Appendix G – Phase I Environmental Site Assessment

Appendix H – Surface Hydrology and Water Quality Technical Memorandum

Appendix I – Noise Calculations and Measurements

Appendix J – Public Services Responses

Appendix K –Traffic Volume Review

Appendix L – Tribal Cultural Resources Consultation Correspondence

Appendix M – Wastewater and Water Supply Technical Memorandum

Appendix N – Water Supply Assessment

Appendix O – Energy Calculations

ATTACHMENT A
Project Description

1. Introduction

The Applicant proposes to develop the Project, which would be developed on an approximately 24.4-acre site located in the northwest quadrant of the intersection of De Soto Avenue and Burbank Boulevard (Project Site), in the Warner Center 2035 (WC2035) Plan area, in the Woodland Hills community of the City of Los Angeles (City). The Project Site is currently improved with a contemporary corporate office park (known as Warner Center Corporate Park), consisting of 12 low-rise commercial structures (Existing Buildings), each on a distinct parcel, ranging in height from one to three stories, supported by surrounding surface parking lots. The Existing Buildings include approximately 340,339 square feet of floor area.

The Project includes the phased demolition of the Existing Buildings and other improvements and the phased construction of a mixed-use development consisting of ten new buildings (New Buildings), varying in height from approximately 35 feet (two levels) to 350 feet (24 levels) in height. The Project would be constructed in eight phases (see Figures A-32 through A-39 below) and includes a total of approximately 2,634,268 square feet of floor area, with approximately 1,175,513 square feet of residential floor area (approximately 45 percent of the total floor area) and approximately 1,458,755 square feet of non-residential floor area, consisting of office, retail and hotel uses (approximately 55 percent of the total floor area). The Project's residential uses consist of approximately 1,009 multi-family units, including 841 apartment units (approximately 53 of which will be Work-Live Units, as defined in Section 4 of the WC2035 Plan) and approximately 168 condominium units (approximately 15 of which will be Work-Live Units). The Project's non-residential uses include approximately 1,140,746 square feet of office space, approximately 7,731 square feet of ground-floor restaurant space, approximately 15,741 square feet of ground-floor retail space, approximately 35,311 square feet of ground-floor restaurant and/or retail space, approximately 26,762 square feet of ground-floor office and/or retail space, an approximately 157,535 square-foot hotel with 228 hotel rooms, and approximately 4,068 square feet of community space. The overall floor area ratio (FAR) for the Project is 2.52:1.

Project parking would be provided within subterranean and podium levels beneath and within eight of the ten New Buildings (New Buildings 1, 2, 3, 5, 6, 7, 8 and 9). Parking for New Buildings 4 and 4a would be provided in podium levels and an attached parking structure in New Building 4. No stand-alone parking structures are proposed. Upon Project completion, onsite parking structures would provide 1,627 residential spaces and 3,921 non-residential spaces, for a total of 5,548 parking spaces. At the time the Applicant filed its application for the Project, it proposed 1,340 long-term bicycle parking spaces and 282 short-term bicycle spaces, for a total of 1,622 bicycle

parking spaces. The City has since amended its bicycle parking ordinance, which has resulted in a reduction of required bicycle parking for the Project. Accordingly, the Project will include 870 long-term bicycle parking spaces and 264 short-term bicycle parking spaces, for a total of 1,134 bicycle parking spaces. In addition, a minimum of 280 parking spaces for motorcycles/scooters will be included as part of the Project.

The Project would be accessible from both Burbank Boulevard to the south and De Soto Avenue to the east. Vehicle access to the parking structures would be provided by an updated internal roadway network. Primary access through the Project Site would be provided by Warner Center Lane, which is a private street that would be reconfigured on a phased basis as part of the Project and qualifies as a "New Street" under the WC2035 Plan. The phased work to reconstruct Warner Center Lane is described in the discussion of "Physical Improvements" in Figures A-32 through A-39 below. Warner Center Lane would connect to two driveways – Commerce Drive to the west and Town Center Drive to the north. The internal circulation system also includes Adler Drive, a third driveway that would be directly accessible from Burbank Boulevard and Commerce Drive. Town Center Drive would provide access to the Phase I and Phase II improvements and would be constructed as described in Figures A-32 and A-33 below.

2. Project Location

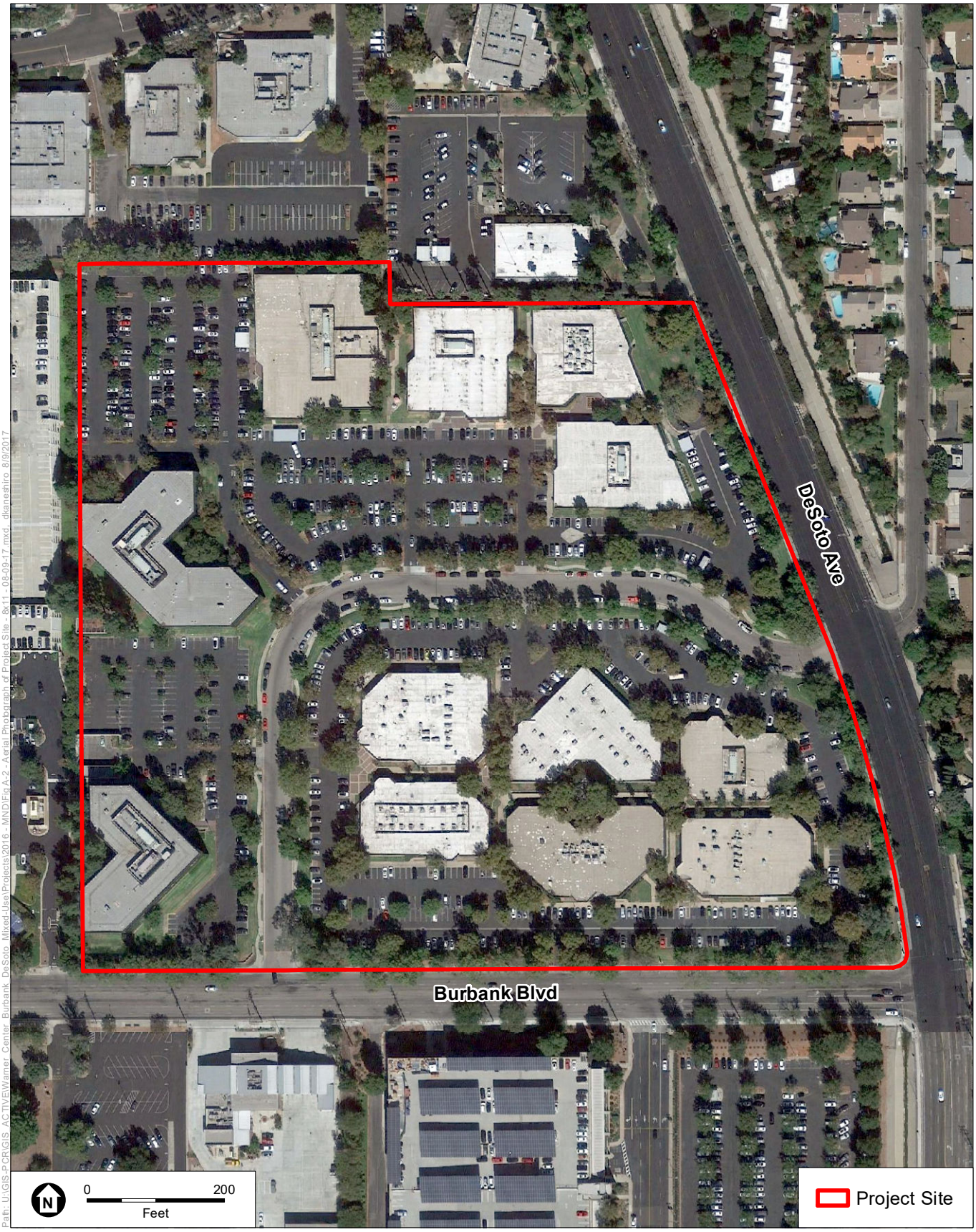
The Project Site is approximately 24.4 acres (1,062,923 square feet) in size and is located in the northwest quadrant of Burbank Boulevard and De Soto Avenue, in the Woodland Hills community of the City. The Project Site is also located in the Commerce District of the Warner Center 2035 Plan area, which is in turn located in the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan area. The Project Site's location is shown in **Figure A-1**, *Project Location Map*, and **Figure A-2**, *Aerial Photograph of Project Site*, provides an aerial photo of the Project Site and surrounding uses. The Project Site is bisected by Warner Center Lane, a private road that would be reconfigured on a phased basis as the Project Site is redeveloped with the New Buildings. The addresses of the Existing Buildings and their corresponding Assessor Parcel Numbers are provided in **Table A-1**, *Project Site Addresses and APNs*, below.

SOURCE: Open Street Map, 2016

De Soto / Burbank Master Plan Project

Figure A-1
Project Location Map

ESA



SOURCE: Google Earth, 2016

De Soto / Burbank Master Plan Project

Figure A-2
Aerial Photograph of Project Site

ESA

TABLE A-1
PROJECT SITE ADDRESSES AND APNS

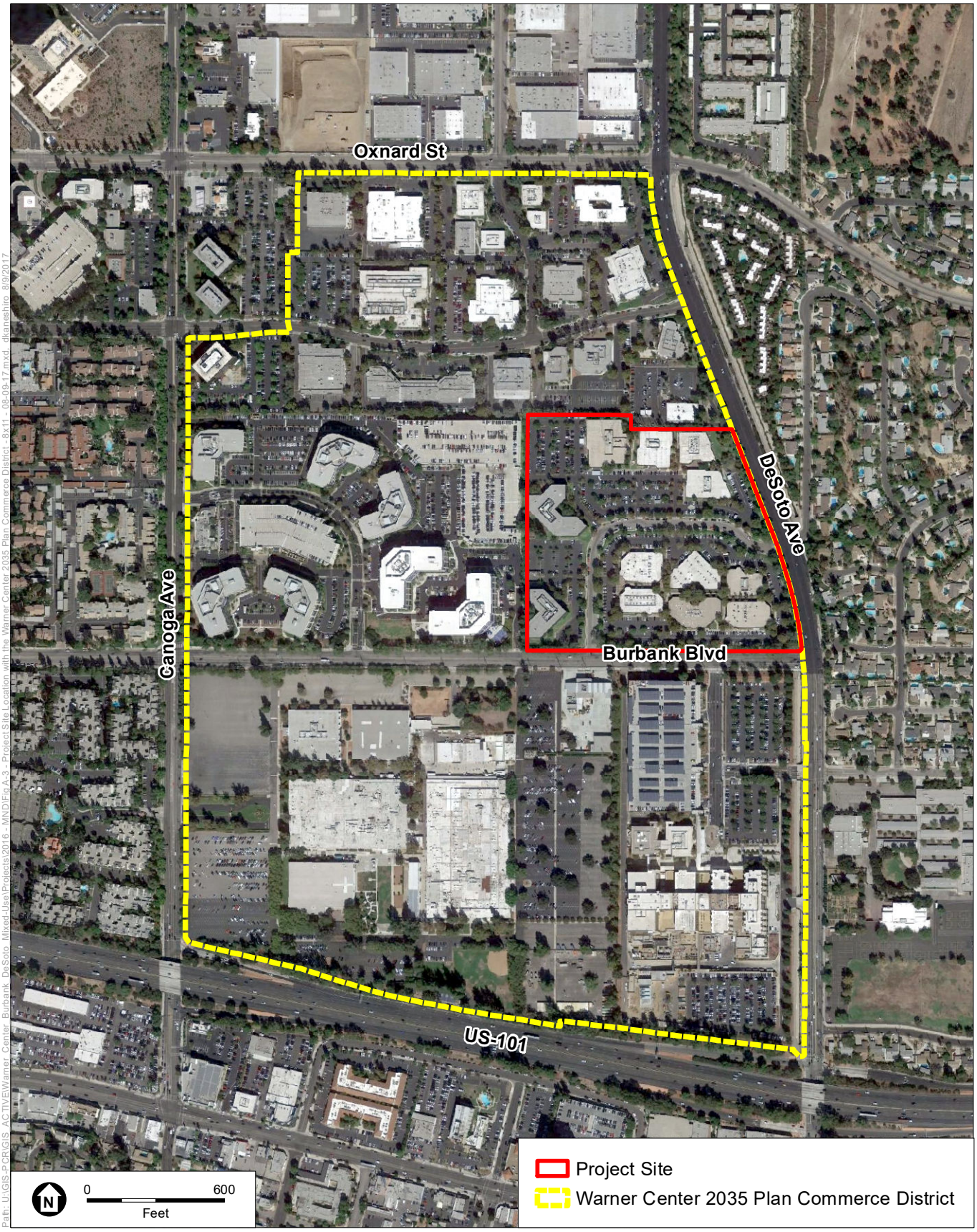
Address	APN	Current Use
1. 20935 Warner Center Lane	2149-017-004	Commercial/Office
2. 20955 Warner Center Lane	2149-017-005	Commercial/Office
3. 21011 Warner Center Lane	2149-017-006	Commercial/Office
4. 21031 Warner Center Lane	2149-017-007	Commercial/Office
5. 21051 Warner Center Lane	2149-017-008	Commercial/Office
6. 21041 Burbank Boulevard	2149-017-009	Commercial/Office
7. 20970 Warner Center Lane	2149-017-010	Commercial/Office
8. 20950 Warner Center Lane	2149-017-011	Commercial/Office
9. 20920 Warner Center Lane	2149-017-012	Commercial/Office
10. 20931 Burbank Boulevard	2149-017-013	Commercial/Office
11. 20951 Burbank Boulevard	2149-017-016	Commercial/Office
12. 20971 Burbank Boulevard	2149-017-015	Commercial/Office

The WC2035 Plan area encompasses the designated Warner Center Regional Center and is approximately 1.5 square miles in size. It is intended to encourage the transformation of Warner Center from a predominately commercial center to a mixed use, transit-oriented development (TOD) center. **Figure A-3**, *Project Site Location within the Warner Center 2035 Plan Commerce District*, shows the Project Site's location within the WC2035 Plan Area and the Commerce District. The boundaries of the Commerce District are US-101 (Ventura Freeway) on the south, Canoga Avenue on the west, Oxnard Street on the north and De Soto Avenue on the east.

3. Surrounding Uses and Project Site Conditions

The Project vicinity is developed with a mix of commercial and office uses, residential uses, and institutional uses, including Los Angeles Fire Department Station 84, the Kaiser Permanente Woodland Hills Medical Center and the Woodland Hills Academy Middle School, which is a school in the Los Angeles Unified School District.

The existing Warner Center Corporate Park, constructed between 1981 and 1984, is nearly at full occupancy with commercial tenants, which include the U.S. Bankruptcy Court and a range of commercial and business establishments, including, for example, Adler Realty Investments, Inc., Allstate Insurance, Revolution Media, Woodland Hills Athletic Club and the Girls Scouts of Greater Los Angeles, and the California Highway Patrol. Supporting surface parking lots surround each of the 12 Existing Buildings, which are accessed by a system of driveways off of Warner Center Lane. The Project Site is well-landscaped, and there are a total of 569 ornamental trees, in addition to shrubs, bushes and grasses, interspersed throughout, as well as 41 off-site street trees. None of these trees are City or otherwise protected tree species.



SOURCE: Google Earth, 2016

De Soto / Burbank Master Plan Project

Figure A-3
Project Site Location with the Warner Center 2035 Plan Commerce District

ESA

Vehicle access to the Existing Buildings is provided by driveways on Warner Center Lane, the private drive that traverses Warner Center Corporate Park and terminates at stop controlled intersections at Burbank Boulevard and De Soto Avenue. Warner Center Lane currently includes a single travel lane and shoulder parking in each direction. Other major roadways in the Project vicinity include Canoga Avenue to the west and Oxnard Street to the north. Regional access is provided by Topanga Canyon Boulevard and the Ventura Freeway, which is located approximately 0.3 mile south of the Project Site. Transit serving the Project Site includes the Los Angeles County Metropolitan Transit Authority (Metro) Lines 244/245 (De Soto/Burbank), Metro Shuttle Line 601, and the Los Angeles Department of Transportation Commuter Express Route 161, which runs from Downtown to Thousand Oaks, with stops at the intersection of Canoga Avenue and Burbank Boulevard. The nearest major transit stop is the Warner Center Transit Hub, approximately 0.7 mile northwest, and the Metro Orange Line Station, approximately 1.1 miles to the north.

The Metro Shuttle Line 601 is the recently implemented Warner Center Shuttle, which now provides two stops located adjacent to and on the Project Site – one stop is located at the northwest intersection of Burbank Boulevard and De Soto Avenue and the other stop to the west of that along Warner Center Lane, just north of Burbank Boulevard – and runs through the Project Site along Warner Center Lane. The Warner Center Shuttle provides direct connection to and from the Metro Orange Line Canoga Station and throughout Warner Center, including direct connection to the Warner Center Towers, Warner Center Corporate Park, and Westfield Topanga, the Village and the Promenade. The Warner Center Shuttle also stops at the Warner Center Transit Hub at the intersection of Oxnard Street and Owensmouth Avenue.

4. Land Use and Zoning

The Project Site is located within the WC2035 Plan area and thus subject to the development standards and other requirements set forth in the WC2035 Plan, which became effective on December 25, 2013. A Final Environmental Impact Report was prepared with respect to the WC2035 Plan, which was certified by the Los Angeles City Council on October 23, 2013 (Council File No. 13-0197) (WC2035 Plan FEIR). The WC2035 Plan evaluated in the WC2035 Plan FEIR encompassed a General Plan Amendment to the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan, located in City Council District No. 3, to replace the 1993 Warner Center Specific Plan and established new districts, use and development standards, mobility requirements and urban design guidelines for Warner Center to further sustainability goals and reduce regional greenhouse gas emissions. The WC2035 Plan FEIR is hereby incorporated by reference into this Tiered IS, pursuant to Section 15150 of the CEQA Guidelines. The WC2035 Plan FEIR is available for public review at the Department of City Planning's Valley Office (6262 Van Nuys Boulevard, Van Nuys, CA 91401) or on the Department's website: (planning.lacity.org/eir/ WarnerCntrRegionalCore/FEIR/WarnerCenter_FEIR.pdf).

The Project has been designed to comply with all applicable standards and design guidelines in the WC2035 Plan, as well as fulfill the WC2035 Plan's vision to create an "urban center where people can live, work and play." According to the WC2035 Plan, its intent is to create a "vibrant Transit Oriented District area based on sustainability, community connectedness, accessible public transit, and promotion of innovative businesses, job diversity, and safe and friendly pedestrian

environment" and "to help to concentrate a mix of uses that are within walking distance to one another so people can easily walk rather than drive."

The entire WC2035 Plan area, including the Project Site, is designated Regional Center Commercial in the Community Plan and zoned Warner Center (WC). Within the WC2035 Plan area, the Project Site is located within the Commerce District, one of eight zoning districts or subareas. The Commerce District is intended to accommodate new residential opportunities, including work-live uses, while retaining some of its historical light industrial land uses. According to the WC2035 Plan, the Commerce District is intended to be the most "jobs-rich" district, and it is intended to provide flexible employment uses with some associated retail uses. Commercial and industrial land use potential is to be maintained at the ground floor throughout the District (WC2035 Plan, Section 6.1.2.2). A range of land uses is therefore permitted in the Commerce District, including but not limited to work-live units; multi-family residential dwelling units; certain industrial, manufacturing, and research and development uses; hybrid industrial uses; specific service industry and office uses; retail stores; and restaurants. The WC2035 Plan established a base maximum FAR of 4.5:1 for the Commerce District, together with a graduated FAR requirement that defines the minimum allowable non-residential floor area in order to maintain a districtwide balance between commercial and residential development. Building height within the Commerce District is unlimited, with some exceptions. Ground floor residential uses are not permitted in the Commerce District.

The proposed land uses (i.e., residential, work-live, hotel, commercial office, retail and restaurant) and physical and operational characteristics of the Project are consistent with development envisioned for the Project Site in the WC2035 Plan and the WC2035 Plan FEIR. Overall, the Project is consistent with WC2035 Plan area-wide and Commerce District-wide development standards evaluated in the WC2035 Plan FEIR, in terms of proposed uses, development envelope, building heights, design standards, setbacks, parking, open space requirements, and the graduated FAR requirement for the proportion of residential to non-residential uses in the Commerce District.

5. Project Characteristics

Consistent with the objectives of the WC2035 Plan and the requirements for projects proposed in the Commerce District, the Project includes a broad mix of residential (apartment, condominium and Work-Live Units), office, restaurant, retail and hotel uses. The ten New Buildings would be developed in eight phases, with a total FAR of approximately 2.52:1 and a combined floor area of approximately 2,634,268 square feet. Approximately 55 percent of the new floor area would be dedicated to non-residential uses, and approximately 45 percent of the floor area would be dedicated to residential uses. In order to allow for the 45 percent of residential floor area proposed, the Project includes two "Incentivized Uses," as described in Section 6.2.1.1 of the WC2035 Plan, consisting of (1) five local-serving businesses located on the ground floor and in compliance with all of the applicable regulations as set forth in the WC2035 Plan, and (2) Publicly Accessible Open Space (PAOS) provided at a minimum of 50 percent more than the amount required pursuant to Section 6.2.2 of the WC2035 Plan. Pursuant to Section 6.2.1.2.3, these two Incentivized Uses allow the Project to ascend the Graduated FAR Table (set forth in Section 6.1.2.2.3) for the Commerce

District to the ">3.0 FAR" level, which allows a minimum non-residential floor area of 50 percent and a maximum residential floor area of 50 percent for the Project.

5.1 Development Program

The statistics for the Project, including a detailed breakdown of uses within each New Building, open space and landscaping, automobile and bicycle parking data, the Leadership in Environmental Energy and Design (LEED©) checklist, and additional project development data are presented in **Figure A-4**, *Building Project Statistics 1*, and **Figure A-5**, *Building Project Statistics 2*. A summary of the proposed land uses and square footage of each of the ten New Buildings are presented in **Table A-2**, *Proposed Development Program*.

BUILDING PROJECT STATISTICS

BUILDING 1 - *For Additional Data Refer to Sheet A1.1*
MIXED USE (WRAP/PODIUM RESIDENTIAL APARTMENTS WITH WORK-LIVE & GROUND FLOOR COMMERCIAL)

FLOOR AREA SUMMARY (PER LAMC) **:**
NON-RESIDENTIAL FLOOR AREA (RESTAURANT/ RETAIL): 12,439 SF
NON-RESIDENTIAL FLOOR AREA (WORK/LIVE) : 49,017 SF
RESIDENTIAL FLOOR AREA (APARTMENTS) : 387,357 SF
RESIDENTIAL FLOOR AREA (WORK/LIVE): 42,781 SF
TOTAL FLOOR AREA : 491,594 SF

UNIT SUMMARY:
TOTAL RESIDENTIAL UNITS : 355 UNITS
Unit Mix- (53) studios, (216) 1-bdrm, (77) 2-bdrm, (9) 3-bdrm
TOTAL WORK/LIVE UNITS : 48 UNITS
Unit Mix- (6) 1-bdrm , (38) 2-bdrm , (4) 3-bdrm
TOTAL : 403 UNITS

PARKING SUMMARY: *Residential Parking: 526 Spaces / Visitor Parking: 32 Spaces/ Restaurant/ Retail Parking: 47 Spaces*
NON-RESIDENTIAL PARKING (RESTAURANT/ RETAIL) : 47 STALLS
REQUIRED RESTAURANT/ RETAIL PARKING RATIO : MIN 2 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED RESTAURANT/ RETAIL PARKING RATIO : 3.78 STALLS PER 1,000 SF
RESIDENTIAL PARKING (APARTMENTS/ WORK-LIVE) : 558 STALLS
REQUIRED RESIDENTIAL PARKING RATIO : MIN 1 PER UNIT / MAX 2 PER UNIT
PROVIDED RESIDENTIAL PARKING RATIO : 1.31 STALLS PER UNIT, 1.38 STALLS PER UNIT (W/ VISITOR PARKING)
TOTAL: 605 STALLS

BUILDING HEIGHT:
±83' (7 STORIES)

BUILDING 2 - *For Additional Data Refer to Sheet A2.1*
MIXED USE (PODIUM RESIDENTIAL APARTMENTS WITH WORK-LIVE & GROUND FLOOR COMMERCIAL)

FLOOR AREA SUMMARY (PER LAMC) **:**
NON-RESIDENTIAL FLOOR AREA (RESTAURANT) : 3,265 SF
NON-RESIDENTIAL FLOOR AREA (WORK/LIVE) : 5,639 SF
RESIDENTIAL FLOOR AREA (APARTMENTS) : 218,088 SF
RESIDENTIAL FLOOR AREA (WORK/LIVE) : 5,804 SF
TOTAL FLOOR AREA : 232,796 SF

UNIT SUMMARY:
TOTAL RESIDENTIAL UNITS : 199 UNITS
Unit Mix- (29) studios, (120) 1-bdrm, (45) 2-bdrm, (5) 3-bdrm
TOTAL WORK/LIVE UNITS : 5 UNITS
Unit Mix- (5) 2-bdrm
TOTAL : 204 UNITS

PARKING SUMMARY: *Residential Parking: 260 Spaces / Visitor Parking: 48 Spaces/ Restaurant Parking: 13 Spaces*
NON-RESIDENTIAL PARKING (RESTAURANT): 13 STALLS
REQUIRED RESTAURANT PARKING RATIO : MIN 2 PER 1,000 SF / MAX 4 PER 1,000 SF
PEOVIDED RESTAURANT PARKING RATIO : 3.98 STALLS PER 1,000 SF
RESIDENTIAL PARKING (APARTMENTS/ WORK-LIVE) : 308 STALLS
REQUIRED RESIDENTIAL PARKING RATIO : MIN 1 PER UNIT / MAX 2 PER UNIT
PROVIDED RESIDENTIAL PARKING RATIO : 1.27 STALLS PER UNIT, 1.50 STALLS PER UNIT (W/ VISITOR PARKING)
TOTAL: 321 STALLS

BUILDING HEIGHT:
±88' (7 STORIES)

BUILDING 3 - *For Additional Data Refer to Sheet A3.1*
MIXED USE (PODIUM RESIDENTIAL APARTMENTS WITH GROUND FLOOR COMMERCIAL)

FLOOR AREA SUMMARY (PER LAMC) **:**
NON-RESIDENTIAL FLOOR AREA (RESTAURANT/ RETAIL): 5,100 SF
RESIDENTIAL FLOOR AREA (APARTMENTS) : 251,927 SF
TOTAL FLOOR AREA : 257,027 SF

UNIT SUMMARY:
TOTAL RESIDENTIAL UNITS : **234 UNITS**
Unit Mix- (44) studios, (106) 1-bdrm, (84) 2-bdrm

PARKING SUMMARY: *Residential Parking: 319 Spaces / Visitor Parking: 64 Spaces/ Restaurant/ Retail Parking: 20 Spaces*
NON-RESIDENTIAL PARKING (RESTAURANT/ RETAIL) : 20 STALLS
REQUIRED RESTAURANT/ RETAIL PARKING RATIO : MIN 2 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED RESTAURANT/ RETAIL PARKING RATIO : 3.92 STALLS PER 1,000 SF
RESIDENTIAL PARKING (APARTMENTS) : 383 STALLS
REQUIRED RESIDENTIAL PARKING RATIO : MIN 1 PER UNIT / MAX 2 PER UNIT
PROVIDED RESIDENTIAL PARKING RATIO : 1.36 STALLS PER UNIT, 1.63 STALLS PER UNIT (W/ VISITOR PARKING)
TOTAL: 403 STALLS

BUILDING HEIGHT:
±86' (7 STORIES)

BUILDING 4 & 4A - *For Additional Data Refer to Sheet A4.1*
MIXED USE (OFFICE WITH GROUND FLOOR COMMERCIAL)

FLOOR AREA SUMMARY (PER LAMC) **:**
BLDG 4A:
NON-RESIDENTIAL FLOOR AREA (RESTAURANT/ RETAIL): 3,942 SF
NON-RESIDENTIAL FLOOR AREA (COMMUNITY SPACE): 4,068 SF
TOTAL BLDG 4A FLOOR AREA: 8,010 SF

PARKING SUMMARY: PARKING PROVIDED IN BUILDING 4.
NON-RESIDENTIAL PARKING (RESTAURANT/ RETAIL): 8 STALLS PROVIDED IN BLDG. 4
NON-RESIDENTIAL PARKING (COMMUNITY SPACE): 82 STALLS PROVIDED IN BLDG. 4
TOTAL PARKING: 90 STALLS PROVIDED IN BLDG. 4
REQUIRED RESTAURANT/ RETAIL PARKING RATIO: MIN 2 PER 1,000 SF/ MAX 4 PER 1,000 SF
PROVIDED RESTAURANT/ RETAIL PARKING RATIO: 2.03 STALLS PER 1,000 SF
REQUIRED COMMUNITY SPACE (AUDITORIUM W/OUT FIXED SEATS)- 1 PER 50SF
PROVIDED COMMUNITY SPACE (AUDITORIUM WITHOUT SEATS)- 1 PER 49.61SF

BLDG 4:
NON-RESIDENTIAL FLOOR AREA (RESTAURANT/ RETAIL): 4,897 SF
NON-RESIDENTIAL FLOOR AREA (RETAIL): 15,741 SF
NON-RESIDENTIAL FLOOR AREA (OFFICE): 421,051 SF
NON-RESIDENTIAL FLOOR AREA (OFFICE SUPPORT): 8,077 SF
TOTAL BLDG 4 FLOOR AREA: 449,766 SF

TOTAL FLOOR AREA *(BLDG 4 + 4A)* **: 457,776 SF**

PARKING SUMMARY *BLDG. 4 & 4A*:
NON-RESIDENTIAL PARKING (RESTAURANT/ RETAIL) : 97 STALLS (INCLUDES 8 STALLS SERVING BLDG. 4A)
REQUIRED RESTAURANT/ RETAIL PARKING RATIO : MIN 2 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED RESTAURANT/ RETAIL PARKING RATIO : 3.9 STALLS PER 1,000 SF
NON-RESIDENTIAL PARKING (OFFICE) : 1,287 STALLS (82 FOR COMMUNITY SERVING USE BLDG 4A & 1,205 FOR OFFICE IN BLDG. 4)
REQUIRED OFFICE PARKING RATIO : MIN 1 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED OFFICE PARKING RATIO : 2.8 STALLS PER 1,000 SF
TOTAL: 1,384 STALLS

BUILDING HEIGHT:
BLDG 4 ± 350' (24 STORIES) / BLDG 4A ± 35' (2 STORY)

BUILDING 5 - *For Additional Data Refer to Sheet A5.1*
MIXED USE (PODIUM RESIDENTIAL CONDOMINIUMS WITH WORK-LIVE & GROUND FLOOR COMMERCIAL)

FLOOR AREA SUMMARY (PER LAMC) **:**
NON-RESIDENTIAL FLOOR AREA (RESTAURANT/ RETAIL) : 8,933 SF
NON-RESIDENTIAL FLOOR AREA (WORK/LIVE) : 16,205 SF
RESIDENTIAL FLOOR AREA (CONDO) : 253,351 SF
RESIDENTIAL FLOOR AREA (WORK/LIVE): 16,205 SF
TOTAL FLOOR AREA : 294,694 SF

UNIT SUMMARY:
TOTAL CONDO UNITS : 153 UNITS
Unit Mix- (35) 1-bdrm, (84) 2-bdrm, (34) 3-bdrm
TOTAL WORK/LIVE UNITS : 15 UNITS
Unit Mix- (14) 2-bdrm, (1) 3-bdrm
TOTAL : 168 UNITS

PARKING SUMMARY: *Residential Parking: 336 Spaces / Visitor Parking: 42 Spaces/ Restaurant/ Retail Parking: 34 Spaces*
NON-RESIDENTIAL PARKING (RESTAURANT/ RETAIL): 34 STALLS
REQUIRED RESTAURANT/ RETAIL PARKING RATIO : MIN 2 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED RESTAURANT/ RETAIL PARKING RATIO : 3.81 STALLS PER 1,000 SF
RESIDENTIAL PARKING (CONDOS/ WORK-LIVE) : 378 STALLS (336 +42 VISITOR)
REQUIRED RESIDENTIAL PARKING RATIO : MIN 1 PER UNIT / MAX 2 PER UNIT
PROVIDED RESIDENTIAL PARKING RATIO : 2.0 STALLS PER UNIT, 2.25 STALLS PER UNIT (W/ VISITOR PARKING)
TOTAL : 412 STALLS

BUILDING HEIGHT:
± 88' (7 STORIES)

BUILDING 6 - *For Additional Data Refer to Sheet A6.1*
MIXED USE (PODIUM HOTEL WITH GROUND FLOOR COMMERCIAL)

FLOOR AREA SUMMARY (PER LAMC) **:**
NON-RESIDENTIAL FLOOR AREA (RESTAURANT): 4,466 SF
NON-RESIDENTIAL FLOOR AREA (HOTEL): 157,535 SF
TOTAL FLOOR AREA : 162,001 SF

UNIT SUMMARY:
TOTAL HOTEL ROOMS : **228 ROOMS**
Room Mix- (86) Standard, (81) Studio, (61) 1-bdrm

PARKING SUMMARY: *Hotel Parking: 183 Spaces / Restaurant Parking: 12 Spaces*
NON-RESIDENTIAL PARKING (RESTAURANT): 12 STALLS
REQUIRED RESTAURANT PARKING RATIO : MIN 2 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED RESTAURANT PARKING RATIO : 2.58 STALLS PER 1,000 SF
NON-RESIDENTIAL (HOTEL) PARKING: 183 STALLS
REQUIRED HOTEL PARKING RATIO : FIRST 30 RMS = 1 STALL / NEXT 30 RMS= ½ STALL / ALL REMAINING = ⅓ STALL = MIN: 101 STALLS REQ.
PROVIDED HOTEL PARKING RATIO : .80 STALLS PER ROOM
TOTAL : 195 STALLS

BUILDING HEIGHT:
± 85' (7 STORIES)

BUILDING 7 - *For Additional Data Refer to Sheet A7.1*
MIXED USE (OFFICE WITH GROUND FLOOR COMMERCIAL)

FLOOR AREA SUMMARY (PER LAMC) **:**
NON-RESIDENTIAL FLOOR AREA (OFFICE/ RETAIL): 11,870 SF
NON-RESIDENTIAL FLOOR AREA (OFFICE): 246,499 SF
NON-RESIDENTIAL FLOOR AREA (OFFICE SUPPORT): 3,853 SF
TOTAL FLOOR AREA : 262,222 SF

PARKING SUMMARY: *Office/ Retail Parking: 42 Spaces / Office Visitor Parking: 165 Spaces/ Office Monthly Parking: 594 Spaces*
NON-RESIDENTIAL PARKING (OFFICE/ RETAIL) : 42 STALLS
REQUIRED OFFICE/ RETAIL PARKING RATIO (BASED ON RETAIL USE (COMMERCIAL): MIN 2 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED OFFICE/RETAIL PARKING RATIO : 3.54 STALLS PER 1,000 SF
NON-RESIDENTIAL PARKING (OFFICE) : 759 STALLS
REQUIRED OFFICE PARKING RATIO : MIN 1 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED OFFICE PARKING RATIO : 3.03 STALLS PER 1,000 SF
TOTAL: 801 STALLS

BUILDING HEIGHT:
±222' (15 STORIES)

BUILDING 8 - *For Additional Data Refer to Sheet A8.1*
MIXED USE (OFFICE WITH GROUND FLOOR COMMERCIAL)

FLOOR AREA SUMMARY (PER LAMC) **:**
NON-RESIDENTIAL FLOOR AREA (OFFICE/ RETAIL): 4,864 SF
NON-RESIDENTIAL FLOOR AREA (OFFICE): 234,397 SF
NON-RESIDENTIAL FLOOR AREA (OFFICE SUPPORT): 2,313 SF
TOTAL FLOOR AREA : 241,574 SF

PARKING SUMMARY: *Office/ Retail Parking: 19 Spaces / Office Visitor Parking: 173 Spaces/ Office Monthly Parking: 555 Spaces*
NON-RESIDENTIAL PARKING (OFFICE/ RETAIL) : 19 STALLS
REQUIRED OFFICE/ RETAIL PARKING RATIO (BASED ON RETAIL USE (COMMERCIAL) : MIN 2 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED OFFICE/ RETAIL PARKING RATIO : 3.91 STALLS PER 1,000 SF
NON-RESIDENTIAL PARKING (OFFICE) : 728 STALLS
REQUIRED OFFICE PARKING RATIO : MIN 1 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED OFFICE PARKING RATIO : 3.07 STALLS PER 1,000 SF
TOTAL: 747 STALLS

BUILDING HEIGHT:
±243' (15 STORIES)

BUILDING 9 - *For Additional Data Refer to Sheet A8.1*
MIXED USE (OFFICE WITH GROUND FLOOR COMMERCIAL)

FLOOR AREA SUMMARY (PER LAMC) **:**
NON-RESIDENTIAL FLOOR AREA (OFFICE/ RETAIL): 10,028 SF
NON-RESIDENTIAL FLOOR AREA (OFFICE): 222,065 SF
NON-RESIDENTIAL FLOOR AREA (OFFICE SUPPORT): 2,491 SF
TOTAL FLOOR AREA : 234,584 SF

PARKING SUMMARY: *Office/ Retail Parking: 24 Spaces / Office Visitor Parking: 154 Spaces/ Office Monthly Parking: 502 Spaces*
NON-RESIDENTIAL PARKING (OFFICE/ RETAIL) : 24 STALLS
REQUIRED OFFICE/ RETAIL PARKING RATIO (BASED ON RETAIL USE (COMMERCIAL) : MIN 2 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED OFFICE/ RETAIL PARKING RATIO : 2.39 STALLS PER 1,000 SF
NON-RESIDENTIAL PARKING (OFFICE) : 656 STALLS
REQUIRED OFFICE PARKING RATIO : MIN 1 PER 1,000 SF / MAX 4 PER 1,000 SF
PROVIDED OFFICE PARKING RATIO : 2.92 STALLS PER 1,000 SF
TOTAL: 680 STALLS

BUILDING HEIGHT:
±239' (15 STORIES)

KEY PLAN

DPADR01.EPS

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-4
Building Project Statistics 1

ESA

TOTAL PROJECT PARKING SUMMARY:		
NON-RESIDENTIAL PARKING :	**RESIDENTIAL PARKING :**	**TOTAL PARKING :**
BUILDING 1: 47 STALLS	BUILDING 1: 558 STALLS	BUILDING 1: 605 STALLS
BUILDING 2: 13 STALLS	BUILDING 2: 308 STALLS	BUILDING 2: 321 STALLS
BUILDING 3: 20 STALLS	BUILDING 3: 383 STALLS	BUILDING 3: 403 STALLS
BUILDING 4 & 4A: 1,384 STALLS	BUILDING 4 & 4A: -	BUILDING 4 & 4A: 1,384 STALLS
BUILDING 5: 34 STALLS	BUILDING 5: 378 STALLS	BUILDING 5: 412 STALLS
BUILDING 6: 195 STALLS	BUILDING 6: -	BUILDING 6: 195 STALLS
BUILDING 7: 801 STALLS	BUILDING 7: -	BUILDING 7: 801 STALLS
BUILDING 8: 747 STALLS	BUILDING 8: -	BUILDING 8: 747 STALLS
BUILDING 9: 680 STALLS	BUILDING 9: -	BUILDING 9: 680 STALLS
TOTAL NON-RESIDENTIAL: 3,921 PARKING STALLS/ 2.87 STALLS PER 1000 SF WITHOUT HOTEL/ 2.68 STALLS PER 1,000 SF WITH HOTEL	**TOTAL RESIDENTIAL: 1,627 PARKING STALLS/ 1.61 STALLS PER LIVING UNIT (INCLUDES VISITOR PARKING)**	**TOTAL PROJECT PARKING: 5,548 PARKING STALLS**

SITE AREA SUMMARY:
TOTAL SITE AREA (BEFORE DEDICATIONS) : 1,062,923 SF / 24.4 ACRES
TOTAL SITE AREA (AFTER DEDICATIONS) : 1,042,301 SF / 23.92 ACRES

TOTAL PROJECT FLOOR AREA SUMMARY:		
NON-RESIDENTIAL FLOOR AREA :	**RESIDENTIAL FLOOR AREA :**	**TOTAL FLOOR AREA :**
BUILDING 1: 61,456 SF	BUILDING 1: 430,138 SF	BUILDING 1: 491,594 SF
BUILDING 2: 8,904 SF	BUILDING 2: 223,892 SF	BUILDING 2: 232,796 SF
BUILDING 3: 5,100 SF	BUILDING 3: 251,927 SF	BUILDING 3: 257,027 SF
BUILDING 4: 449,766 SF	BUILDING 4: -	BUILDING 4: 449,766 SF
BUILDING 4A: 8,010 SF	BUILDING 4A: -	BUILDING 4A: 8,010 SF
BUILDING 5: 25,138 SF	BUILDING 5: 269,556 SF	BUILDING 5: 294,694 SF
BUILDING 6: 162,001 SF	BUILDING 6: -	BUILDING 6: 162,001 SF
BUILDING 7: 262,222 SF	BUILDING 7: -	BUILDING 7: 262,222 SF
BUILDING 8: 241,574 SF	BUILDING 8: -	BUILDING 8: 241,574 SF
BUILDING 9: 234,584 SF	BUILDING 9: -	BUILDING 9: 234,584 SF
TOTAL NON-RESIDENTIAL FLOOR AREA : 1,458,755 SF (55%) / 50% min required	TOTAL RESIDENTIAL FLOOR AREA : 1,175,513 SF (45%) / 50% max permitted	**TOTAL PROJECT FLOOR AREA: 2,634,268 SF**
		2,634,268 / 1,042,301 = FAR 2.52
		NOTE: PER WC 2035 PLAN SECTION 6.2.1.2.3, A RESIDENTIAL BONUS IS PERMITTED FOR UP TO 2 INCENTIVIZED USES TO ASCEND THE GRADUATED FAR TABLE USE MIX BY TWO LEVELS. TWO INCENTIVIZED USES ARE PROPOSED - 5 LOCAL SERVING RETAIL BUSINESSES (EACH WITH UP TO 5,000 SF OF FLOOR AREA) AND 50% ADDITIONAL PAOS.

TOTAL NON-RESIDENTIAL AREA:									
	RETAIL:	**RESTAURANT:**	**RESTAURANT/ RETAIL:**	**COMMUNITY SPACE:**	**WORK/LIVE NON-RESIDENTIAL:**	**OFFICE/ RETAIL:**	**OFFICE:**	**OFFICE SUPPORT:**	**HOTEL:**	**TOTAL:**
BUILDING 1:	-	-	12,439 SF	-	49,017 SF	-	-	-	-	61,456 SF
BUILDING 2:	-	3,265	-	-	5,639 SF	-	-	-	-	8,904 SF
BUILDING 3:	-	-	5,100 SF	-	-	-	-	-	-	5,100 SF
BUILDING 4	15,741 SF	-	4,897 SF	-	-	-	421,051 SF	8,077 SF	-	449,766 SF
BUILDING 4A:	-	-	3,942 SF	4,068 SF	-	-	-	-	-	8,010 SF
BUILDING 5:	-	-	8,933 SF	-	16,205 SF	-	-	-	-	25,138 SF
BUILDING 6:	-	4,466 SF	-	-	-	-	-	-	157,535 SF	162,001 SF
BUILDING 7:	-	-	-	-	-	11,870 SF	246,499 SF	3,853 SF	-	262,222 SF
BUILDING 8:	-	-	-	-	-	4,864 SF	234,397 SF	2,313 SF	-	241,574 SF
BUILDING 9:	-	-	-	-	-	10,028 SF	222,065 SF	2,491 SF	-	234,584 SF
	TOTAL RETAIL AREA: **15,741 SF**	TOTAL RESTAURANT AREA: **7,731 SF**	TOTAL RESTAURANT/ RETAIL AREA: **35,311 SF**	TOTAL COMMUNITY SPACE: **4,068 SF**	TOTAL WORK/LIVE NON-RESIDENTIAL AREA: **70,861 SF**	TOTAL OFFICE/ RETAIL AREA: **26,762 SF**	TOTAL OFFICE AREA: **1,124,012 SF**	TOTAL OFFICE/ SUPPORT AREA: **16,734 SF**	TOTAL HOTEL AREA: **157,535 SF**	TOTAL NON-RESIDENTIAL AREA: **1,458,755 SF**

TOTAL PROJECT UNIT SUMMARY:					
	WORK/ LIVE UNITS :	**RESIDENTIAL UNITS :**	**CONDO UNITS :**	**HOTEL ROOMS :**	**TOTAL UNITS/ ROOMS :**
BUILDING 1:	48 UNITS	355 UNITS	-	-	403 UNITS
BUILDING 2:	5 UNITS	199 UNITS	-	-	204 UNITS
BUILDING 3:	-	234 UNITS	-	-	234 UNITS
BUILDING 4 & 4A:	-	-	-	-	-
BUILDING 5:	15 UNITS *	-	153 UNITS	-	168 UNITS
BUILDING 6:	-	-	-	228 ROOMS	228 ROOMS
BUILDING 7:	-	-	-	-	-
BUILDING 8:	-	-	-	-	-
BUILDING 9:	-	-	-	-	-
	TOTAL WORK/LIVE UNITS: **68 UNITS** *INCLUDING 15 CONDO WORK/LIVE UNITS*	TOTAL RESIDENTIAL UNITS: **788 UNITS**	TOTAL CONDO UNITS: **153 UNITS (PLUS 15 WORK/ LIVE CONDOS)**	TOTAL HOTEL ROOMS: **228 ROOMS**	TOTAL RESIDENTIAL- **1,009 UNITS** HOTEL- **228 ROOMS**

PROJECT STATISTICS NOTES

1: WHERE RESTAURANT/ RETAIL USES ARE SHOWN, 60% OF THE SPACES WILL BE ATTRIBUTED TO RESTAURANT AND 40% FOR RETAIL FOR THE OVERALL PROJECT. PARKING REQUIREMENTS WILL BE BASED ON THE COMMERCIAL USE REQUIREMENTS OF THE WC 2035 PLAN AT 2 PER 1000 SF MINIMUM AND 4 PER 1000 SF MAXIMUM.

2: WHERE OFFICE/ RETAIL USES ARE SHOWN, 50% OF THE SPACES WILL BE ATTRIBUTED TO OFFICE USES AND 50% FOR RETAIL FOR THE OVERALL PROJECT. PARKING REQUIREMENTS FOR THE ENTIRE ALLOCATED AREAS DEEMED AS OFFICE / RETAIL WILL BE BASED ON THE HIGHER REQUIREMENTS FOR PARKING AND AS SUCH WILL BE MEETING THE COMMERCIAL USE REQUIREMENTS OF THE WC 2035 PLAN AT 2 PER 1000 SF MINIMUM AND 4 PER 1000 SF MAXIMUM.

3: MIN/ MAX PARKING REQUIRED SHALL BE PER WC 2035 PLAN SEC.6.2.3 FOR ALL USES EXCEPT HOTEL WHICH WILL BE PER LAMC SEC.12.21A4(b)

4: FLOOR AREAS AND BUILDING HEIGHTS SHOWN ARE AS DEFINED IN THE LOS ANGELES MUNICIPAL CODE SECTION 12.03

5: FLOOR AREA RATIO (FAR) IS PER WC 2035 PLAN AND IS DEFINED AS THE RATIO OF A BUILDING'S TOTAL FLOOR AREA, AS DEFINED IN LAMC SECTION 12.21.1A , TO THE AREA OF IT'S LOT AFTER DEDICATIONS.

6: SEE SHEET MP-12 FOR ADDITIONAL DETAILED STATISTICS.

7: SEE PUBLICLY ACCESSIBLE OPEN SPACE DIAGRAM SHEET MP-22 FOR REQUIRED PUBLICLY ACCESSIBLE OPEN SPACE REQUIREMENTS.

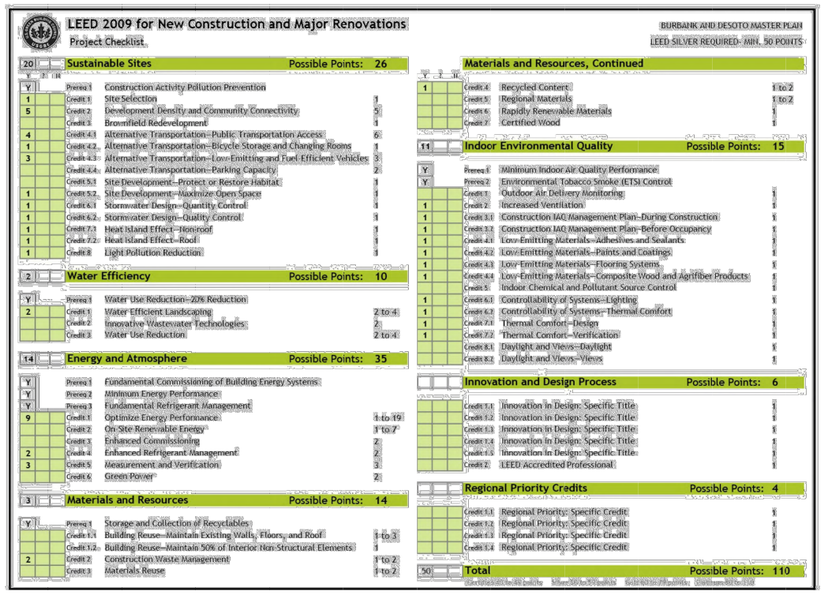
8: SEE A1.1/A2.1/A3.1/A4.1/A5.1/A6.1/A7.1/A8.1 FOR EACH SPECIFIC BUILDING/ BICYCLE PARKING REQUIREMENTS.

9: PER WC 2035 PLAN SECTION 16- PRORATION OF NUMBERS- WHENEVER MINIMUM REQUIREMENTS ARE DICTATED AND SUCH NUMBERS DO NOT RESULT IN A WHOLE NUMBER SUCH NUMBERS SHALL BE ROUNDED UP. WHENEVER A MAXIMUM IS DICTATED, THE NUMBERS SHALL BE ROUNDED DOWN.

PUBLICLY ACCESSIBLE OPEN SPACE (P.A.O.S.) FOR TOTAL BUILDING PHASEOUT:

P.A.O.S. REQUIRED:* (15%/2 X 23.92 ACRES)] X 1.5 = 2.69 ACRES)*
PROVIDED: 2.79 ACRES
(EXCESS OPEN SPACE FOR PARK AND RECREATIONAL FACILITIES ALSO PROVIDED)

* - REQUIRED P.A.O.S. PER WC 2035 PLAN: 15% OF TOTAL SITE AREA.
- 50% REDUCTION OF REQUIRED P.A.O.S. ALLOWED IF NEW STREET IS PROVIDED PER WC 2035 PLAN 6.2.2.3.2.
- 50% INCREASE AFTER REDUCTION FOR NEW STREET AS AN INCENTIVIZED USE PER WC 2035 PLAN 6.2.1.1.5.



SUSTAINABILITY NOTES:

1. LEED LIST IS PRELIMINARY. EACH PROJECT PHASE WILL MEET THE EQUIVALENT OF THE LEED SILVER LEVEL PER THE REQUIREMENTS OF THE WC 2035 PLAN ON ITS OWN. INDIVIDUAL LEED LIST ITEMS REQUIREMENTS MAY VARY BETWEEN EACH PHASE.
2. ROOFING MATERIALS TO HAVE AN EQUAL OR GREATER THAN SOLAR REFLECTANCE INDEX OF 78.
3. PROJECT SHALL MEET CAL GREEN CODE REQUIREMENTS.

KEY PLAN

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-5
Buidling Project Statistics 2

ESA

TABLE A-2
PROPOSED DEVELOPMENT PROGRAM

USE	SIZE/AREA	
Project Site Area (Net) Post Dedication	1,042,301	sf
	23.92	ac
Building 1 – Seven Stories		
Residential Units		
Work-Live Units – 1 Bedroom	6	du
Work-Live Units – 2 Bedroom	38	du
Work-Live Units – 3 BR + Den	4	du
Studio	53	du
1 Bedroom	213	du
1 Bedroom + Den	3	du
2 Bedroom	77	du
3 Bedroom	9	du
Total Dwelling Units	403	du
Total Residential Floor Area	*430,138*	*sf*
Non-Residential		
Restaurant/Retail	12,439	sf
Non-Residential Portion of Work-Live Units	49,017	sf
Total Non-Residential Floor Area	*61,456*	*sf*
Total Floor Area – Building 1	**491,594**	**sf**
Building 2 – Seven Stories		
Residential Units		
Work-Live Units – 2 Bedroom	5	du
Studio	29	du
1 Bedroom	120	du
2 Bedroom	45	du
3 Bedroom	5	du
Total Dwelling Units	204	du
Total Residential Floor Area	*223,892*	*sf*
Non-Residential		
Restaurant	3,265	sf
Non-Residential Portion of Work-Live Units	5,639	sf
Total Non-Residential Floor Area	*8,904*	*sf*
Total Floor Area – Building 2	**232,796**	**sf**

USE	SIZE/AREA	
Building 3 – Seven Stories		
Residential Units		
Studio	44	du
1 Bedroom	106	du
2 Bedroom	84	du
Total Dwelling Units	234	du
Total Residential Floor Area	*257,027*	*sf*
Non-Residential		
Restaurant/Retail	5,100	sf
Total Non-Residential Floor Area	*5,100*	*sf*
Total Floor Area – Building 3	**277,431**	**sf**
Building 4 – 24 Stories		
Non-Residential		
Retail	15,741	sf
Restaurant/Retail	4,897	sf
Office	421,051	sf
Office Support	8,077	sf
Total Non-Residential Floor Area	*449,766*	*sf*
Total Floor Area – Building 4	**449,766**	**sf**
Building 4a – Two Stories		
Non-Residential		
Community Space	4,068	sf
Restaurant/Retail	3,942	sf
Total Non-Residential Floor Area	*8,010*	*sf*
Total Floor Area – Building 4a	*8,010*	sf
Total Floor Area – Building 4 + 4a	**457,776**	**sf**
Building 5 – Seven Stories		
Residential Units		
Work-Live Units – 2 Bedroom	14	du
Work-Live Units – 3 Bedroom	1	du
1 Bedroom	35	du
2 Bedroom	49	du
2 Bedroom + Den	35	du
3 Bedroom	34	du
Total Dwelling Units	168	du
Total Residential Floor Area	*269,556*	*sf*
Non-Residential		
Restaurant/Retail	8,933	sf
Non-Residential Portion of Work-Live Units	16,205	sf
Total Non-Residential Floor Area	*25,138*	*sf*

USE	SIZE/AREA	
Total Floor Area – Building 5	**294,694**	**sf**
Building 6 – Seven Stories		
Non-Residential		
Hotel Rooms	228	Rooms
Hotel[a]	157,535	sf
Restaurant	4,466	sf
Total Non-Residential Floor Area	*162,001*	*sf*
Total Floor Area – Building 6	**162,001**	**sf**
Building 7 – 15 Stories		
Non-Residential		
Office/Retail	11,870	sf
Office	246,499	sf
Office Support	3,853	sf
Total Non-Residential Floor Area	*262,222*	*sf*
Total Floor Area – Building 7	**262,222**	**sf**
Building 8 – 15 Stories		
Non-Residential		
Office/Retail	4,864	sf
Office	234,397	sf
Office Support	2,313	sf
Total Non-Residential Floor Area	*241,574*	*sf*
Total Floor Area – Building 8	**241,574**	**sf**
Building 9 – 15 Stories		
Non-Residential		
Office/Retail	10,028	sf
Office	222,065	sf
Office Support	2,491	sf
Total Non-Residential Floor Area	*234,584*	*sf*
Total Floor Area – Building 9	**234,584**	**sf**
Project Summary		
Total Residential Floor Area	1,175,513	sf
Total Non-Residential Floor Area	1,458,755	sf
Total Project Floor Area	2,634,268	sf
Floor Area Ratio (FAR)	2.52:1	
Vehicle Parking		
Residential	1,627	Spaces
Non-Residential	3,921	Spaces
Vehicle Parking Proposed	5,548	Spaces

USE	SIZE/AREA	
Bicycle Parking		
Long Term Bicycle Parking	870	Spaces
Short Term Bicycle Parking	264	Spaces
Total Bicycle Parking Proposed	**1,134**	**Spaces**
Minimum Motorcycle/Scooter Parking Proposed	**280**	**Spaces**
Open Space, Landscaping & Amenities		
Publicly Accessible Open Space		
Landscaped Area	39.694	sf
Total Publicly Accessible Open Space Provided	121,683	sf
Residential Open Space & Amenities		
Total Interior Residential Amenities	**35,181**	**sf**
Private Open Space for Residents (Balconies, Private Patios)	46,500	sf
Common Landscaped Areas	86,111	sf
Total Residential Amenities	**167,792**	**sf**

[A] The total floor area for the hotel includes such uses as lobby, bar/lounge, gift shop/sundry, administrative offices, business center, commercial kitchen, buffet, elevator lobby, laundry, housekeeping, meeting room, fitness center, employee lounge and shower, computer room, storage room and men's/women's locker.

Source: Van Tilburg, Banvard & Soderbergh, AIA, May 2019.

The ground floors of most of the New Buildings include a combination of uses. In some cases, the project plans identify certain ground-floor areas as "restaurant/retail" or "office/retail" (see Figures A-7 to A-11). These plans do not break down the specific floor areas for the contemplated restaurant, retail and office uses, but rather state the total floor area of the contemplated "restaurant/retail" or "office/retail" space on the respective ground floors. Accordingly, Building 1 includes approximately 12,439 square feet of ground-floor "restaurant/retail" floor space, Building 2 includes approximately 3,265 square feet of ground-floor "restaurant/retail" space, Building 3 includes approximately 5,100 square feet of ground-floor "restaurant/retail" space, Building 4 includes approximately 20,638 square feet of ground-floor "restaurant/retail" space, Building 4a includes approximately 3,942 square feet of ground-floor "restaurant/retail" space, Building 5 includes approximately 8,933 square feet of ground-floor "restaurant/retail" space, Building 6 includes approximately 44,66 square feet of ground-floor "restaurant/retail" space, Building 7 includes approximately 11,870 square feet of ground-floor "office/retail" space, Building 8 includes approximately 4,864 square feet of ground-floor "office/retail" space and Building 9 includes approximately 10,028 square feet of ground-floor "office/retail" space.

The precise breakdown of these combined floor areas will depend on market conditions at the time each New Building is constructed. However, as set forth in the project plans (see Figures A-4 and A-5), the allocation of these ground-floor uses for the overall Project will be 60 percent restaurant and 40 percent retail for proposed "restaurant/retail" uses and 50 percent office and 50 percent retail

for proposed "office/retail" uses, although these percentages may vary in the individual New Buildings. These percentage breakdowns have been incorporated into the environmental analysis.

The overall conceptual site plan for the Project at the ground level is presented in **Figure A-6,** *Conceptual Site Plan*. The New Buildings are depicted in **Figure A-7**, *Building 1 Site Plan*; **Figure A-8**, *Buildings 2 and 3 Site Plan*; **Figure A-9**, *Buildings 4 and 4a Site Plan*; **Figure A-10**, *Buildings 5 and 7 Site Plan*; and **Figure A-11**, *Buildings 6, 8 and 9 Site Plan*.

5.2 Project Design and Architecture

The Project is designed to fulfill the vision for Warner Center's Commerce District to create an "urban center where people can live, work and play," while embracing the existing commercial and multi-family context in the Project Site vicinity. The New Buildings are designed to create balance across the Project Site through the use of varying structural heights and massing and the provision of generous open space, while serving as a focal point and gateway to the eastern approach to the WC2035 Plan area. The facades of the low-rise residential New Buildings incorporate recesses and angled massing to provide articulation and feature modern detailing, variation of materials, and expression of the functional elements of the buildings. Transparency at the ground level and large window openings at the second floor convey the modern expression of the buildings. The scale of the upper floors is articulated through the use of wall recesses, balconies, window patterns, stair wells and varying parapet heights and colors. Stucco, wood siding and masonry veneers are used as predominant materials in the low-rise buildings, as well as varying window framing materials along storefronts and upper floors. The mid- and high-rise New Buildings have more simple, controlled massing, primarily utilizing lighter materials such as metal and glass. Podium parking levels in the non-residential buildings are screened in a similar fashion, utilizing lighter materials and varying patterns and architectural features. Podium parking levels in the residential buildings are wrapped with habitable space. Many of the New Buildings include planted roof terraces in carefully selected areas that naturally terminate at the tops of massed elements and soften the aesthetic.

Conceptual renderings of the Project portray the design and style of the overall development, as well as each of the New Buildings. A conceptual depiction of the entire Project is shown in **Figure A-12**, *Overall Site Rendering*. Building 1 is conceptually depicted in **Figure A-13**, *Building 1 Rendering*. Buildings 2 and 3 are conceptually depicted in **Figure A-14**, *Buildings 2 and 3 Rendering*. Buildings 4 and 4a are conceptually depicted in **Figure A-15**, *Buildings 4 and 4a Rendering*. Building 5 is conceptually depicted in **Figure A-16**, *Building 5 Rendering*. The shared courtyard between Buildings 5 and 6 is conceptually depicted in **Figure A-17**, *Buildings 5 and 6 Courtyard Rendering*. Building 6 is conceptually depicted in **Figure A-18**, *Building 6 Rendering*. Building 7 is conceptually depicted in **Figure A-19**, *Building 7 Rendering*. Buildings 8 and 9 are conceptually depicted in **Figure A-20**, *Buildings 8 and 9 Rendering*. The shared courtyard between Buildings 8 and 9 is conceptually depicted in **Figure A-21**, *Buildings 8 and 9 Courtyard Rendering*.

The variety of structural heights and massing of the New Buildings as they are arranged within the Project Site are shown in **Figure A-22**, *South and East Elevations*, and **Figure A-23**, *West and North Elevations*. **Figure A-24**, *Site Sections A, B and C*, and **Figure A-25**, *Site Sections D, E and*

F, show the heights of the New Buildings and the floors within them, as well as the below-grade parking levels.

5.3 Access and Circulation, Parking and Bicycle Amenities

The Project would be accessible from both Burbank Boulevard to the south and De Soto Avenue to the east, as depicted in **Figure A-26**, *Circulation and Connectivity Diagram*. **Figure A-27**, *Internal Traffic and Parking Improvements*, shows auto circulation through the Project Site and parking structure access. The primary access through the Project Site would be provided by Warner Center Lane, which is a private street that would be reconfigured on a phased basis as the Project Site is redeveloped with the New Buildings and that would qualify as a "New Street" pursuant to Section 6.2.5.2.1 of the WC2035 Plan. This street complies with the New Street standards in Section 6.2.5.2.1, which require a minimum 64-foot right-of-way, a maximum roadway width of 36 feet, a minimum paved sidewalk width of six feet, and a minimum parkway width of eight feet.

Warner Center Lane also connects with two driveways – Commerce Drive to the west and Town Center Drive to the north. Adler Drive, a third driveway, would be directly accessible from Burbank Boulevard and Commerce Drive.

As shown in Figure A-27, two new traffic signals are proposed as part of the Project. One signal would be located at the primary Project Site access at the intersection of Warner Center Lane and De Soto Avenue/Serrania Avenue, and is anticipated to be installed in connection with the development of New Building 1. The second new traffic signal would be located at the intersection of Warner Center Lane/Burbank Boulevard, and is anticipated to be installed in connection with the development of New Building 4.

As another important feature of the Project, consistent with the spirit and intent of the WC2035 Plan to allow for large projects on existing large blocks to provide adequate pedestrian and vehicular circulation, or cross block connectivity, is Adler Drive (a 28-foot wide private driveway), which is proposed along the west side of the Project Site and has been designed to allow for potential future connection to Califa Street. The northern end of Adler Drive will be temporarily improved as private park-like open space until such time that the adjacent property to the north is redeveloped and Califa Street can potentially be extended in a southerly direction to the northern terminus of Adler Drive. Crosswalks are shown in Figure A-27.

Upon Project completion, onsite parking structures would provide 1,627 residential spaces and 3,921 non-residential spaces, for a total of 5,548 parking spaces. The Project also includes 870 long-term and 264 short-term bicycle parking spaces, for a total of 1,134 bicycle parking spaces.

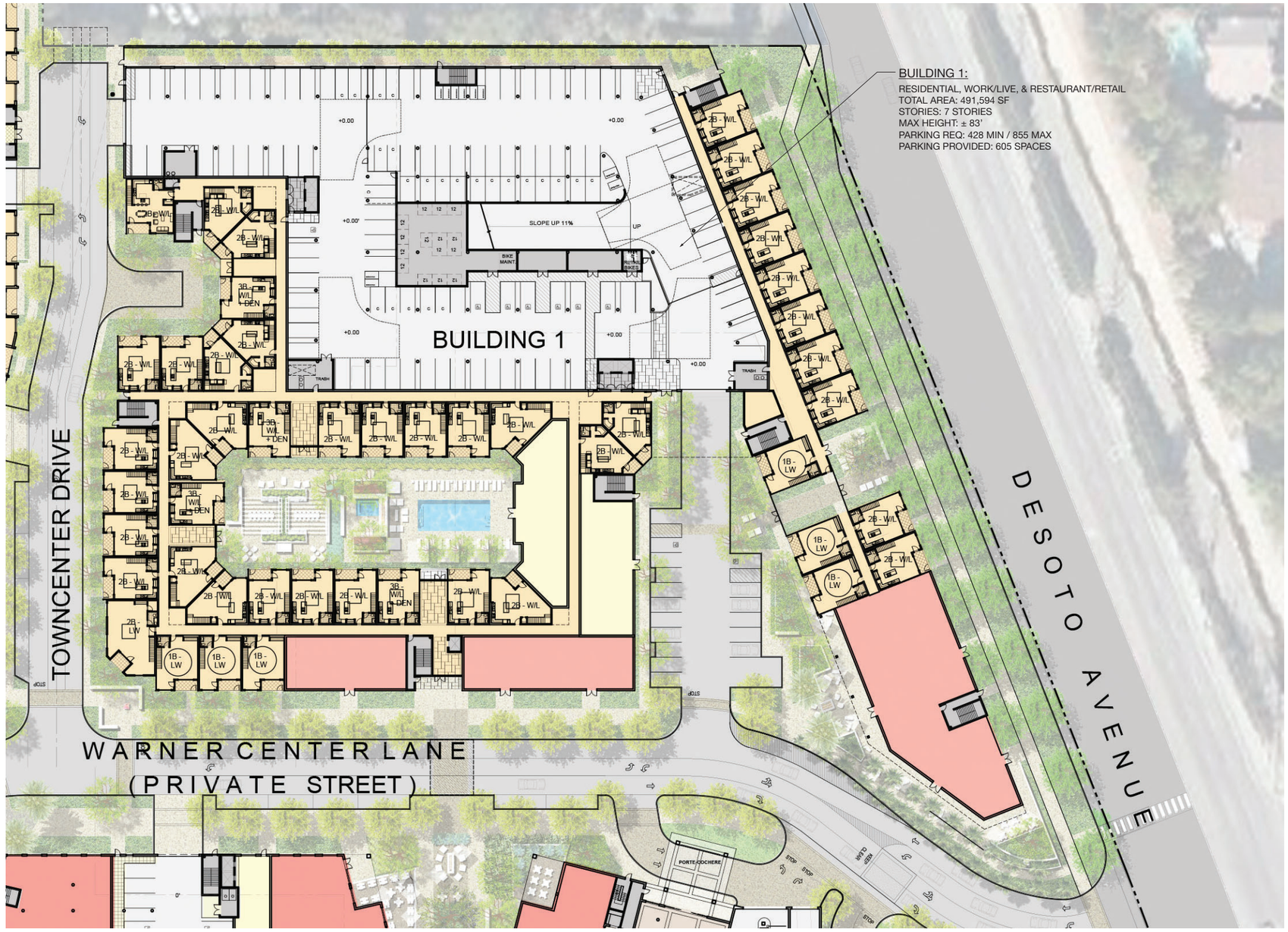
DPADR01.EPP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-6
Conceptual Site Plan

ESA



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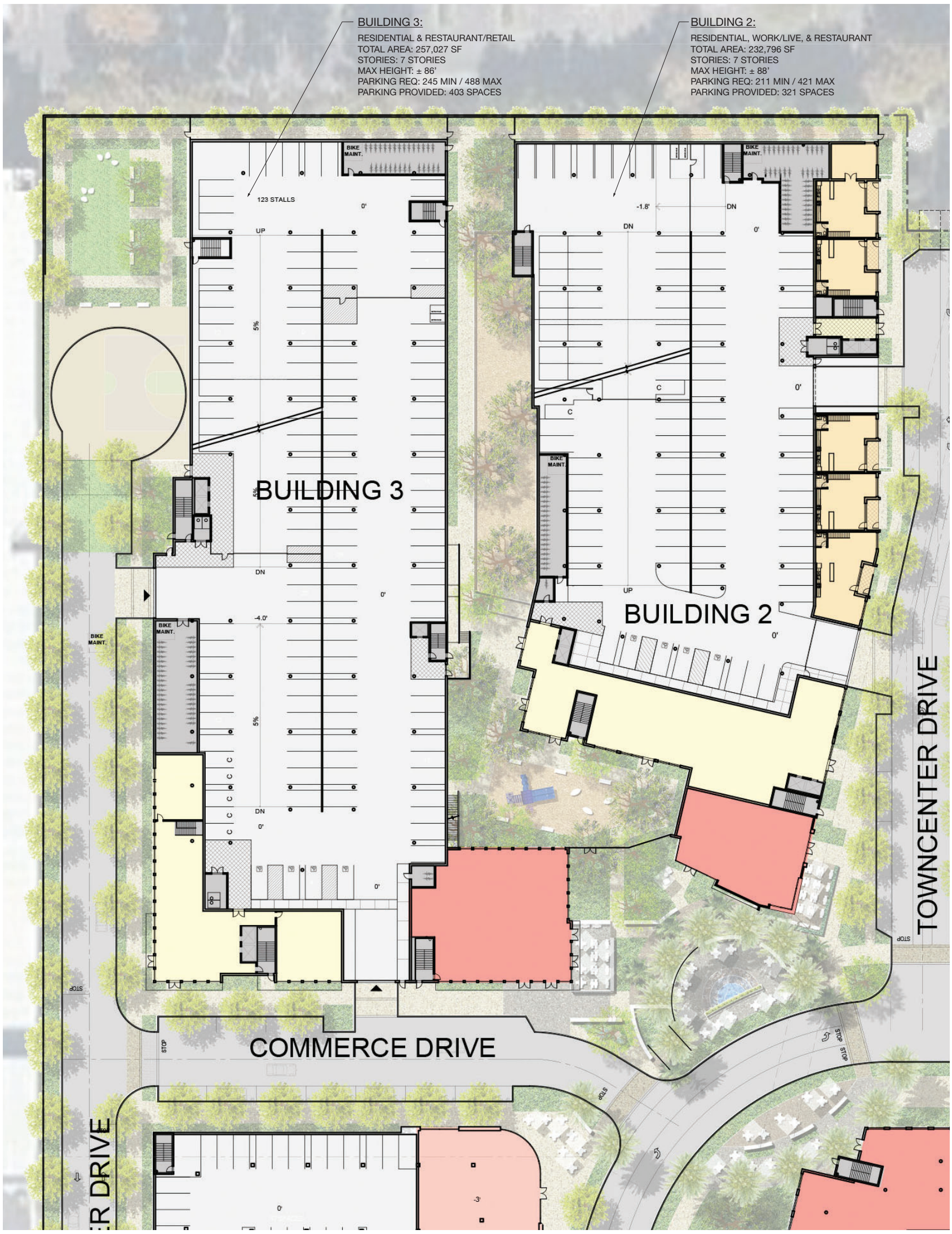
SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-7
Building 1 Site Plan

ESA



COLOR LEGEND

- RESIDENTIAL LOBBY
- LIVE / WORK
- RESTAURANT
- RETAIL
- RESTAURANT /RETAIL
- OFFICE /RETAIL
- OFFICE
- HOTEL
- BOH
- PARKING

KEY PLAN

N

0 200

Feet

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-8
Buildings 2 and 3 Site Plan

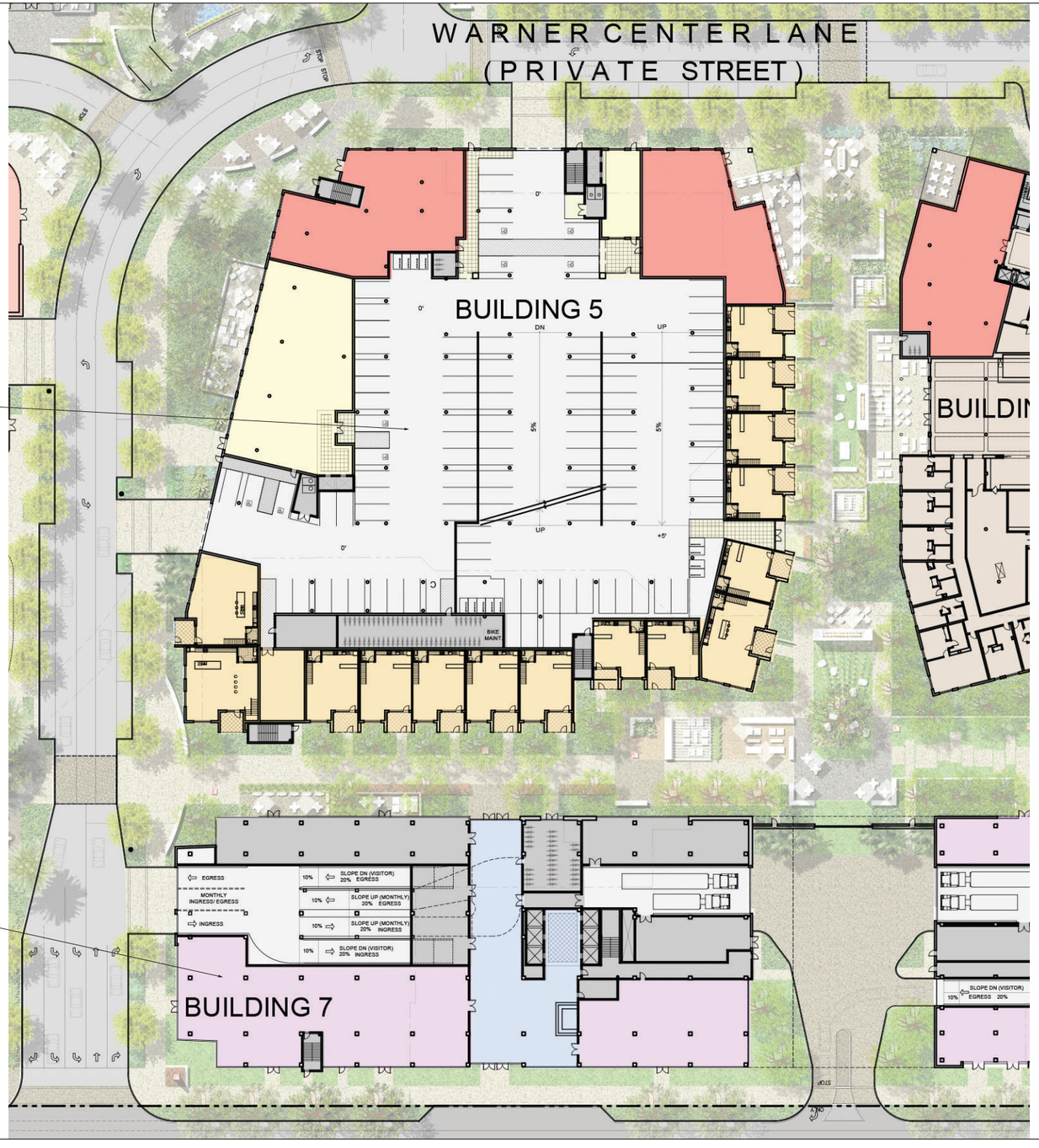
ESA

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-9
Buidlings 4 and 4a Site Plan

ESA



BUILDING 5:

RESIDENTIAL. WORK/LIVE & RESTAURANT/RETAIL
TOTAL AREA: 294,694 SF
STORIES: 7 STORIES
MAX HEIGHT: ± 88'
PARKING REQ: 186 MIN / 371 MAX
PLUS VISITOR PARKING
PARKING PROVIDED: 412 SPACES

BUILDING 7:

OFFICE & RETAIL
TOTAL AREA: 292,222 SF
STORIES: 15 STORIES
MAX HEIGHT: ± 222'
PARKING REQ: 275 MIN / 1,047 MAX
PARKING PROVIDED: 801 SPACES

0 200
Feet

COLOR LEGEND

- RESIDENTIAL LOBBY
- LIVE / WORK
- RESTAURANT
- RETAIL
- RESTAURANT /RETAIL
- OFFICE /RETAIL
- OFFICE
- HOTEL
- BOH
- PARKING

KEY PLAN

DPADR01.EPS

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-10
Buildings 5 and 7 Site Plan

ESA

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-11
Buidlings 6, 8 and 9 Site Plan

ESA

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-12
Overall Site Rendering

ESA

KEY PLAN

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-13
Building 1 Rendering

ESA

KEY PLAN

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-14
Buildings 2 and 3 Rendering

ESA

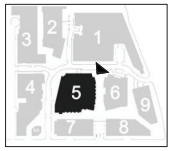
DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-15
Buildings 4 and 4a Rendering

ESA



KEY PLAN

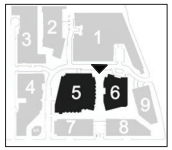
DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-16
Building 5 Rendering

ESA



KEY PLAN

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-17
Buildings 5 and 6 Courtyard Rendering

ESA

KEY PLAN

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-18
Building 6 Rendering

ESA

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-19
Building 7 Rendering

ESA

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-20
Buildings 8 and 9 Rendering

ESA

KEY PLAN

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

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Figure A-21
Buildings 8 and 9 Courtyard Rendering

ESA

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-22
South and East Elevations

ESA

0 128
Feet

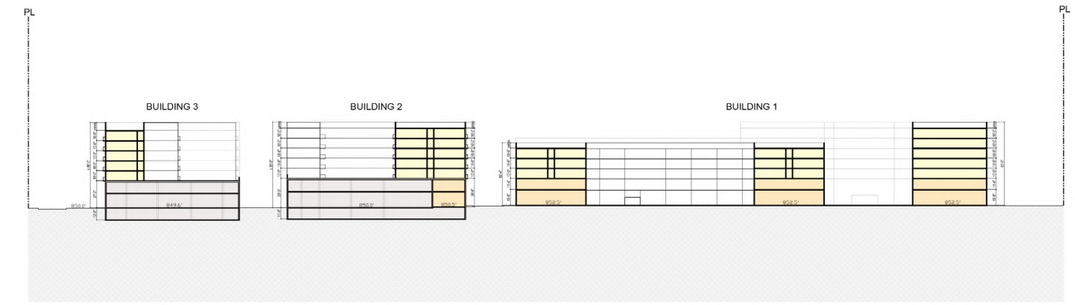
DPADR01.EPS

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

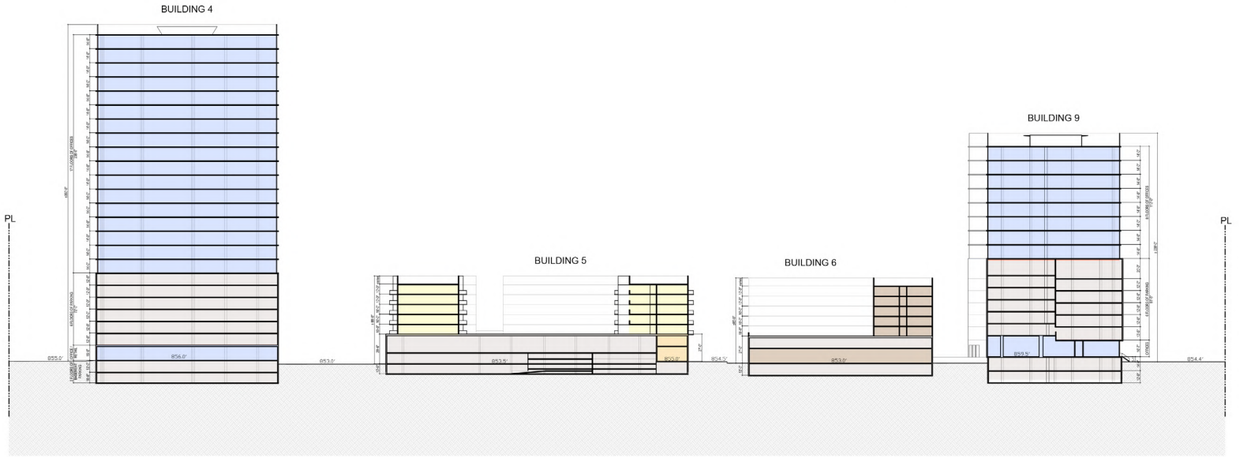
De Soto / Burbank Master Plan Project

Figure A-23
West and North Elevations

ESA



SECTION A



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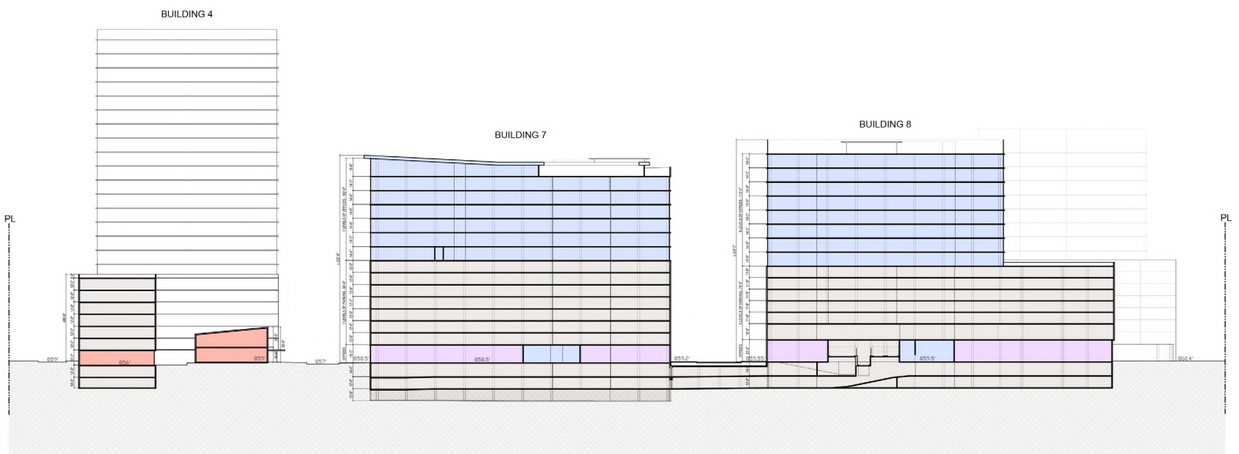

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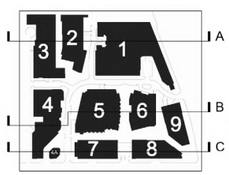


KEY PLAN

COLOR LEGEND

- RESIDENTIAL LOBBY
- LIVE / WORK
- RESTAURANT
- RETAIL
- RESTAURANT /RETAIL
- OFFICE /RETAIL
- OFFICE
- HOTEL
- BOH
- PARKING

0 200

Feet

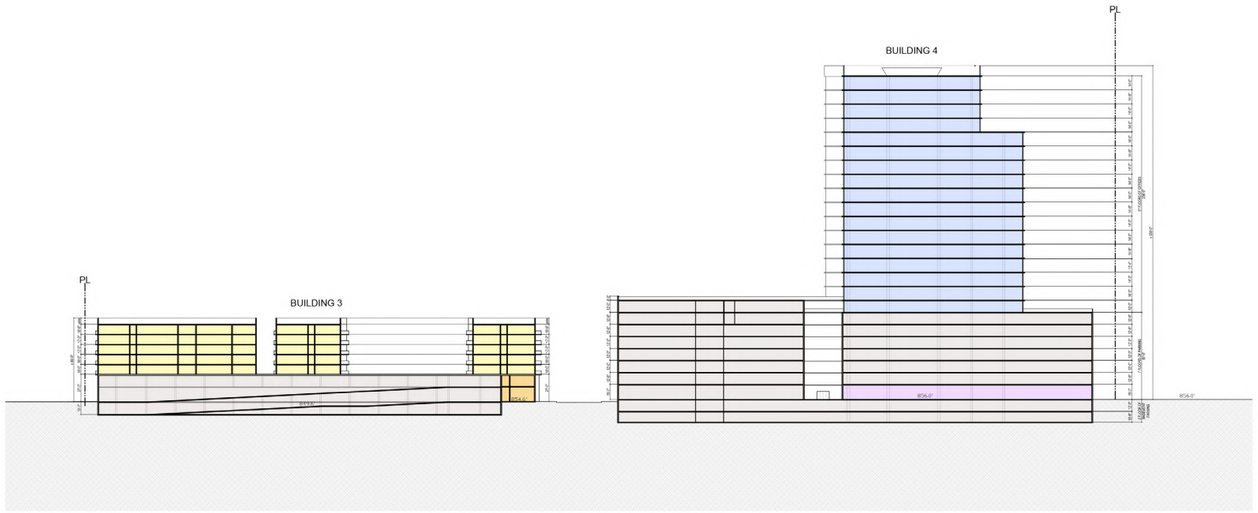
DPADR01.EPS

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

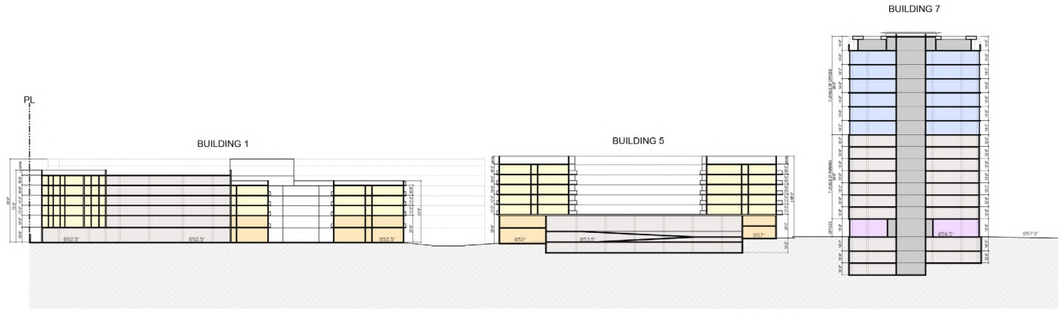
De Soto / Burbank Master Plan Project

Figure A-24
Site Sections A, B and C

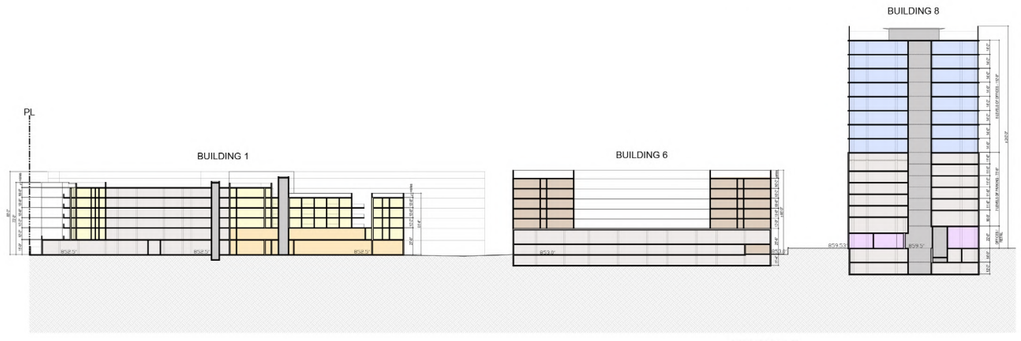
ESA



SECTION D



SECTION E

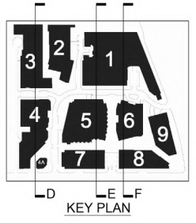


SECTION F

COLOR LEGEND

- RESIDENTIAL LOBBY
- LIVE / WORK
- RESTAURANT
- RETAIL
- RESTAURANT /RETAIL
- OFFICE /RETAIL
- OFFICE
- HOTEL
- BOH
- PARKING

0 200
Feet



DPADR01.EPS

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-25
Site Sections D, E and F

ESA

WC 2035 PLAN REQUIREMENTS– STREETS & PEDESTRIAN PATHS

SEC. 6.1.2.2.7– ACTIVITY NODE– WARNER CENTER LANE AND BURBANK BOULEVARD (SUBSTITUTION OF VARIEL AND BURBANK)

SEC. 6.1.2.2.8– ACTIVE STREET FRONTAGES– NORTH SIDE OF BURBANK BOULEVARD FROM WEST PROPERTY LINE TO 150' EAST OF THE CENTERLINE OF WARNER CENTER LANE (INSTEAD OF VARIEL AVENUE).

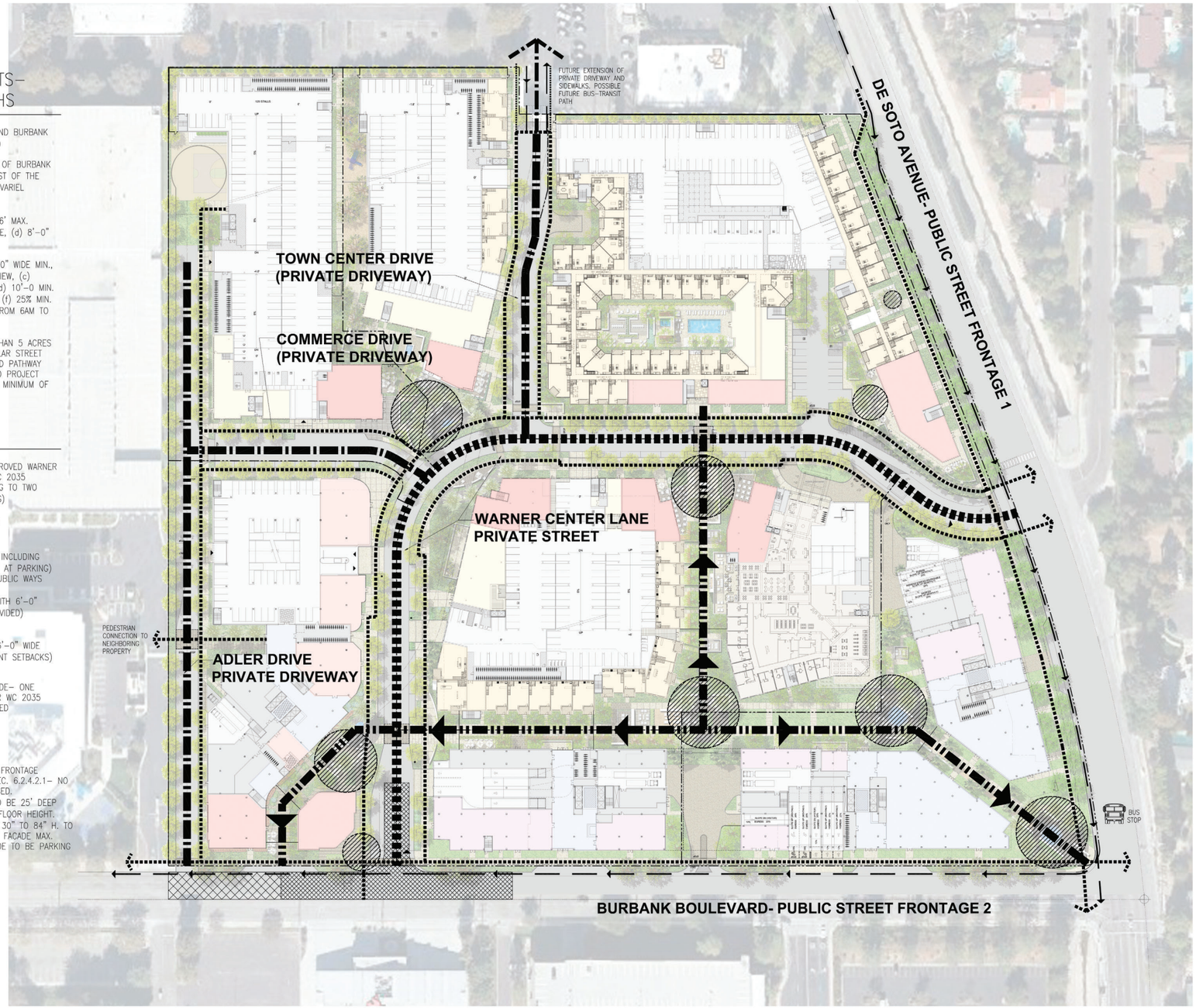
SEC. 6.2.5.2.1– NEW STREETS (a) 64' MIN. R.O.W., (b) 36' MAX. ROADWAY WIDTH, (c) 6'–0" MIN. SIDEWALK EACH SIDE, (d) 8'–0" WIDE MIN. PARKWAY EACH SIDE

SEC. 6.2.5.2.2– PEDESTRIAN ADAPTED PATHWAYS (a) 20'–0" WIDE MIN., (b) CONNECTIONS TO PUBLIC WAYS SUBJECT TO REVIEW, (c) NON–MOTORIZED AND EMERGENCY VEHICLES ONLY, (d) 10'–0 MIN. PATHWAY REQUIRED, (e) LIGHTING TO BE APPROVED, (f) 25% MIN. SHALL BE LANDSCAPED, (g) OPEN TO THE PUBLIC FROM 6AM TO 10PM

SEC. 6.2.5.3.1(b)– MASTER PLANNED PROJECT GREATER THAN 5 ACRES WITH TWO PUBLIC STREET FRONTAGES– PERPENDICULAR STREET FRONTAGES– A NEW STREET OR PEDESTRIAN ADAPTED PATHWAY SHALL BE INCORPORATED INTO THE MASTER PLANNED PROJECT AND SHALL CONNECT TO EACH PUBLIC STREET AT A MINIMUM OF ONE DISCRETE POINT.

LEGEND

- NEW PRIVATE STREET (IMPROVED WARNER CENTER LANE TO MEET WC 2035 REQUIREMENTS CONNECTING TO TWO PUBLIC STREET FRONTAGES)
- NEW PEDESTRIAN ADAPTED PATHWAY
- NEW MULTI– MODAL LANE INCLUDING BIKES (5'–0" MIN./ 6'–0" AT PARKING) EXISTING TO REMAIN AT PUBLIC WAYS
- NEW PRIVATE DRIVEWAY (WITH 6'–0" WIDE MIN. SIDEWALKS PROVIDED)
- NEW PEDESTRIAN SIDEWALK/CONNECTIONS (6'–0" WIDE MIN., 8'–0" MIN. AT FRONT SETBACKS)
- FOCAL POINT/ PLAZA/ NODE– ONE 500SF MIN. REQUIRED PER WC 2035 SEC. 6.2.2.4.3– 8 PROVIDED
- ACTIVITY NODE
- ACTIVITY NODES & ACTIVE FRONTAGE STREETS PER WC 2035 SEC. 6.2.4.2.1– NO RESIDENTIAL USES PROPOSED. NON–RESIDENTIAL USES TO BE 25' DEEP WITH 15' MIN. FLOOR TO FLOOR HEIGHT. 75% OF FACADE BETWEEN 30" TO 84" H. TO BE TRANSPARENT, 20% OF FACADE MAX. ADJACENT TO ACTIVITY NODE TO BE PARKING
- ACTIVE FRONTAGE STREET



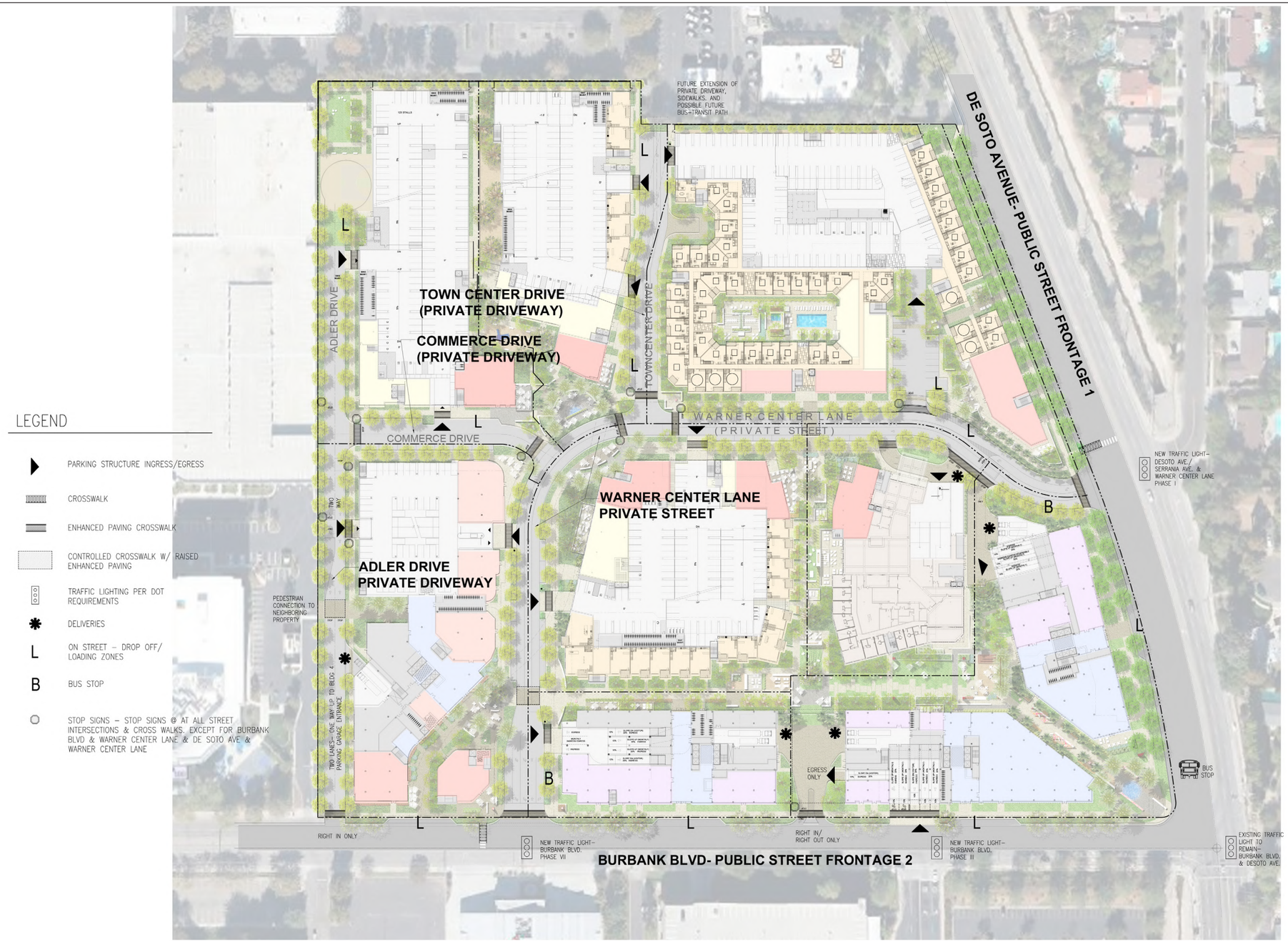
DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-26
Circulation and Connectivity Diagram

ESA



SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-27
Internal Traffic and Parking Improvements

ESA

PUBLICLY ACCESSIBLE OPEN SPACE (PAOS) SUMMARY:

PAOS REQUIRED:

TOTAL SITE AREA (AFTER DEDICATIONS): 1,042,301 SF / 23.92 ACRES

REQUIRED: 15% OF SITE AREA/2 x 1.5*: 117,259 sf 2.69 acres 11.25%

* ACCESSIBLE OPEN SPACE PER WC 2035 PLAN SECTION 6.2.2.3.2: 50% REDUCTION FROM 15% REQUIREMENT WHEN NEW STREET IS PROVIDED PLUS 50% INCREASE TO QUALIFY AS AN INCENTIVIZED USE PER 6.2.1.1.5.

PAOS PROVIDED:

BURBANK SETBACK EAST	5626 sf		
BURBANK SETBACK CENTRAL 1	6298 sf		
BURBANK SETBACK CENTRAL 2	1664 sf		
BURBANK SETBACK WEST	3217 sf		
WARNER CENTER LANE SETBACK 1	2066 sf		
WARNER CENTER LANE SETBACK 2	7914 sf		
WARNER CENTER LANE SETBACK 3	4628 sf		
WARNER CENTER LANE SETBACK 4	1228 sf		
WARNER CENTER LANE SETBACK 5	8970 sf		
WARNER CENTER LANE SETBACK 6	7300 sf		
WARNER CENTER LANE SETBACK 7	1734 sf		
WARNER CENTER LANE SETBACK 8	2196 sf		
WARNER CENTER LANE SETBACK 9	5392 sf		
DESOTO SETBACK NORTH	7850 sf		
DESOTO NORTH EASEMENT	6530 sf		
DESOTO SETBACK SOUTH	11454 sf		
PLAZA - FOCAL 1	1575 sf		
PLAZA 4	9891 sf		
PAOS 1	2290 sf		
PAOS 2	6019 sf		
PAOS 3	4593 sf		
PAOS 4	2623 sf		
PAOS 5	1863 sf		
PAOS 6	1130 sf		
PAOS 7	2415 sf		
PAOS 8	1666 sf		
PAOS 9	3551 sf		
TOTAL PROVIDED	**121,683 sf**	**2.79 acres**	**11.66%**

EXCESS OPEN SPACE FOR PARK AND RECREATIONAL FACILITIES:

WARNER CENTER LANE RECREATIONAL SPACE	11750 SF		
PLAZA - FOCAL 2	9108 sf		
PLAZA 3 - TOWN CENTER	8105 sf		
PEDESTRIAN ACCESSIBLE PATHWAY	74297 sf		
PUBLIC PLAYGROUND	6502 sf		
EXCESS PROVIDED (APPROXIMATELY)	**109762 SF**	**2.52 acres**	**10.53%**

LEGEND

PROVIDED PUBLICLY ACCESSIBLE OPEN SPACE

EXCESS OPEN SPACE FOR PARK AND RECREATIONAL FACILITIES

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-28
Publicly Accessible Open Space Diagram

ESA

LEGEND

1. FOCAL POINT INCLUDING BUILT-IN SEATING AND/OR SCULPTURE, ENHANCED PAVING AND TABLES/CHAIRS
2. PEDESTRIAN ACCESSIBLE PATHWAY
3. EXISTING STREET TREE TO REMAIN, TYPICAL
4. NEW GINKGO BILOBA STREET TREE
5. NEW STREET TREE, TYPICAL ULMUS PARVIFOLIA
6. CHILDREN'S PLAY AREA
7. BASKETBALL COURT
8. DOG PARK
9. EXERCISE TRACK WITH OUTDOOR EQUIPMENT
10. FLEXIBLE OUTDOOR USE AREA
11. FIREPLACE
12. OUTDOOR TABLE AND CHAIRS
13. LOUNGE FURNITURE WITH CIP FIRE PIT
14. RAISED PLANTER
15. STEEL AND WOOD TRELLIS
16. CIP RETAINING WALL
17. ENHANCED PAVING
18. CONCRETE SEAT WALL
19. OUTDOOR PATIO
20. FIRE LANE GRASSCRETE PAVING
21. DECOMPOSED GRANITE
22. CORNER FOCAL POINT PLAZA WITH SCULPTURE
23. OUTDOOR BARBEQUE
24. POOL DECK WITH SPA AND CABANAS
25. UMBRELLA/TENT
26. MULTI-PURPOSE LAWN
27. PET RELIEF STATION
28. PERMANENT PUBLIC ART
29. ACCENT WALL
30. ZEN GARDEN

PAOS

REQUIRED: 15% OF SITE AREA/2 X 1.5*: 117,259 SF (2.69 ACRES)
* ACCESSIBLE OPEN SPACE PER WC 2035 PLAN SECTION 6.2.2.3.2: 50% REDUCTION FROM 15% REQUIREMENT WHEN NEW STREET IS PROVIDED PLUS 50% INCREASE TO QUALIFY AS AN INCENTIVIZED USE PER 6.2.1.1.5.
PROVIDED: 121,683 SF (2.79 ACRES)

0 100 Feet

NOTES:

1. NON-NATIVE TREES GREATER THAN 10 CENTIMETERS (4 INCHES) IN DIAMETER AT BREAST HEIGHT (4.5 FEET ABOVE SURROUNDING GRADE) WILL BE REPLACED WITH NATIVE OR NON-NATIVE (NON-INVASIVE) TREES OF APPROPRIATE LOCAL CLIMATE TOLERANCE AT A 2:1 RATIO.
2. PER WC 2035 PLAN SEC. 6.2.6.2.6, ALL PLANTED AREAS WITHIN THE PROJECT WILL BE SERVICED BY AUTOMATIC IRRIGATION SYSTEMS AND WILL CONFORM WITH THE CITY'S WATER CONSERVATION REQUIREMENTS.
3. SURFACE PARKING LOT NEAR BUILDING 1 WILL COMPLY WITH WC 2035 PLAN SEC. 6.2.6.2.7(1)
4. PROJECT WILL COMPLY WITH WC 2035 PLAN SEC. 6.2.6.2.7(2), AS APPLICABLE

WC 2035 LANDSCAPE REQUIREMENTS

WC 2035 LANDSCAPING REQ.	AREA (SF)	REQ'D	LANDSCAPING REQ'D	LANDSCAPING PROVIDED	PROVIDED
SETBACK	84067 SF	30% MIN	25220 SF	39694 SF	47%
SEATING	121683 SF	1 /500 SF	243 SEATS	256 SEATS	1/475 SF
TOTAL PAOS	121683 SF	50% MIN	60842 SF	60850 SF	50%
PAP	74297 SF	25% MIN	18574 SF	18580 SF	25%

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-29
Conceptual Ground Level Landscape Plan

ESA

LEGEND

1. OUTDOOR BARBEQUE
2. POOL DECK WITH SPA AND CABANAS
3. FIREPLACE
4. OUTDOOR TABLE AND CHAIRS
5. RAISED PLANTER
6. STEEL AND WOOD TRELLIS
7. ENHANCED PAVING
8. PORTABLE POTS
9. BANQUETTE SEATING
10. LOUNGE FURNITURE WITH CIP FIRE PIT
11. ARTIFICIAL TURF
12. CHILDREN'S PLAY AREA
13. DOG PARK

DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-30
Conceptual Podium Level Landscape Plan

ESA

5.4 Open Space, Recreational Amenities and Landscaping

As part of the Project, the Project Site will be improved with generous amounts of PAOS and excess open space areas, including, but not limited to, landscape and hardscape features, focal points and seating that satisfy the PAOS requirements in the WC2035 Plan. The proposed PAOS is depicted in **Figure A-28**, *Publicly Accessible Open Space Diagram* and includes approximately 121,683 square feet (or approximately 2.79 acres, and approximately 11.66 percent of the net lot area) of PAOS, which is greater than the minimum PAOS required in Section 6.2.2 of the WC2035 Plan.

Furthermore, the Project includes Warner Center Lane, a private street that qualifies as a New Street under the WC2035 Plan. Pursuant to Section 6.2.2.3.2 of the WC2035 Plan, the inclusion of this New Street reduces the Project's PAOS requirement by 50 percent, from 15 percent to 7.5 percent of the net lot area. This translates to a reduction in the minimum PAOS required from 156,345 square feet, or 3.59 acres, to approximately 78,172.6 square feet, or 1.80 acres. However, as previously discussed, the Project requires two Incentivized Uses in order to ascend the Graduated FAR Table use mix for the Commerce District. One of the Incentivized Uses provided is a minimum of 50 percent more PAOS than is required by Section 6.2.2 of the WC2035 Plan. As a result, the PAOS required for the proposed Project increases by 50 percent, from 1.8 acres to approximately 2.69 acres. Therefore, the 2.79 acres of PAOS included in the Project exceeds the required PAOS of 2.69 acres.

Currently, the Project Site has numerous mature, ornamental trees, bushes and shrubs, and none of the trees on the Project Site are protected by City or State law. All 569 existing trees on the Project Site will be removed as part of the Project. Of these, 542 trees are greater than 4 inches in diameter at breast height and thus, will be replaced at a 2:1 ratio in accordance with WC2035 Plan FEIR Mitigation Measure WC-BIO-2. As such, 1,084 new trees will be replanted onsite. In addition, there are 41 street trees that are greater than 4 inches in diameter at breast height, 28 of which will be removed and replaced at a 2:1 ratio. Thus, an additional 56 trees will be replanted, in accordance with WC2035 Plan FEIR Mitigation Measure WC-BIO-2.

As depicted in **Figure A-29**, *Conceptual Ground Level Landscape Plan*, and **Figure A-30**, *Conceptual Podium Level Landscape Plan*, the Project Site will be attractively improved and landscaped with PAOS areas throughout, connecting the Project to the adjoining public streets, connecting buildings on the Project Site, and creating a pleasant pedestrian experience for occupants, users and visitors of the Project. Although only one Pedestrian Adapted Pathway (PAP) is required under Section 6.2.5.3.1(b) of the WC2035 Plan, the Project includes three PAPs, all of which function as portions of the PAOS.

One PAP will run east/west and provide public street access into and through the Project Site, from the southeast corner to Burbank Boulevard west of Warner Center Lane, and will provide connections to two other proposed north/south running PAPs located between Buildings 5 and 6 and Buildings 6 and 9, respectively. Focal points and plazas are also proposed throughout the Project and within PAOS areas. There are a total of eight focal points/plazas, although only one focal point is required under Section 6.2.2.4.3 of the WC2035 Plan. Focal points will feature built-in seating and/or sculptures, enhanced paving and tables and chairs. The proposed PAOS areas are

contiguously located throughout the Project Site, except where interrupted to allow for the right-of-way (i.e., Warner Center Lane) or driveways.

5.5 Lighting and Signage

New project signage would be designed in conformance with the WC2035 Plan Sign District requirements, as well as the WC2035 Plan guidance regarding signage design requirements established for the Commerce District. New Project Site signage is anticipated to include building address identification, commercial/retail way-finding; parking entry guidance; and security markings. Commercial signage would minimize glare from fixtures to complement architectural features and reduce the potential for light spillover. Pedestrian areas, such as internal streets and sidewalks, PAOS and PAPs, would be well-lit for security. Lighting would be shielded downward and/or away from sensitive uses, including lighting for outdoor areas. Project lighting would also include visible interior light emanating from ground-level uses, architectural lighting, and decorative lighting within pedestrian plazas and seating areas.

5.6 Site Security

The Project would incorporate a number of design features to ensure the safety of residents, employees and visitors, and the buildings would be designed to promote defensible spaces and visual access. Open space areas will have lighted walkways, and parking areas will include security lighting as well. Other security measures would include controlled building and parking lot access for residential uses, security staff, closed-circuit television monitoring, and security guard desks with check-in required at the office tower.

5.7 Sustainability Features

As shown in Figure A-5, the Project would meet or exceed the equivalent of LEED© Silver. Project design would comply with the applicable provisions of the WC2035 Plan Urban Design Guidelines and the Los Angeles Green Building Code, which builds upon the 2016 California Green Building Code. Additional Project design features that would contribute to energy efficiency may include the use of materials and finishes that emit low quantities of volatile organic compounds, or volatile organic compounds; the installation of new heating, ventilation and air conditioning units that utilize ozone friendly refrigerants; high-efficiency Energy Star appliances; and the provision of a substantial amount of bicycle parking. The Project would comply with the 2016 California Green Building Code requirements for electric vehicle (EV) charging spaces. Onsite recycling facilities would be provided pursuant to LAMC requirements.

5.8 Construction Information

Anticipated Construction Schedule and Phasing

Construction of the Project is anticipated to begin in 2020 and would be completed in 2035. The Project would be developed in eight phases (Phases 1-8), as provided in the detailed phasing plan prepared for the Project. The phasing plan includes an estimate of when each area of the Project will be constructed based on the anticipated future market conditions. In addition, the Existing

Buildings and associated surface parking areas currently on the Project Site will remain and continue to operate during construction and operation of the New Buildings.

It is possible that there would be partial overlap between the construction periods for Phase 1 (New Building 1) and Phase 2 (New Building 2), with the excavation for Phase 2 commencing near the end of the construction of Phase 1. It is also possible that that there would be full overlap between the construction of Phase 5 (New Building 5) and Phase 6 (New Building 3). In addition, New Buildings 8 and 9 in Phase 3 are anticipated to be constructed roughly at the same time. Any revisions to project phasing would require approval from the Planning Department to ensure that any changes would not affect the environmental analysis or conclusions herein.

Details regarding the contemplated phasing for the Project are provided in the following illustrations:

- **Figure A-31**, Existing Site Conditions
- **Figure A-32**, Project Construction – Phase 1
- **Figure A-33**, Project Construction – Phase 2
- **Figure A-34**, Project Construction – Phase 3
- **Figure A-35**, Project Construction – Phase 4
- **Figure A-36**, Project Construction – Phase 5
- **Figure A-37**, Project Construction – Phase 6
- **Figure A-38**, Project Construction – Phase 7
- **Figure A-39**, Project Construction – Phase 8

Construction Overview

Project construction would require grading and excavation activities across the Project Site down to a maximum depth of 25 feet below existing grade for building foundations and 2 levels of subterranean parking. The Project includes 430,000 cubic yards (cy) of cut and 20,000 cy of fill, which will therefore require the export of approximately 410,000 cy of soil from the Project Site on a phased basis. Details regarding the grading quantities and the amount of soil to be exported by phase are as follows:

- Phase 1 – 14,000 cy of cut, 8,000 cy of fill, and 6,000 cy of export
- Phase 2 – 31,000 cy of cut, 3,000 cy of fill, and 28,000 cy of export
- Phase 3 – 107,000 cy of cut, 2,000 cy of fill, and 105,000 cy of export
- Phase 4 – 39,000 cy of cut, 1,000 cy of fill, and 38,000 cy of export
- Phase 5 – 42,000 cy of cut, 2,000 cy of fill, and 40,000 cy of export
- Phase 6 – 49,000 cy of cut, 2,000 cy of fill, and 47,000 cy of export

- Phase 7 – 60,000 cy of cut, 1,000 cy of fill, and 59,000 cy of export
- Phase 8 – 88,000 cy of cut, 1,000 cy of fill, and 87,000 cy of export.

Pursuant to Mitigation Measure WC-NOI-5 in the WC2035 FEIR, during project construction, temporary use noise barriers would be installed to block line-of-sight (sound) between construction equipment and any noise-sensitive receptors within 500 feet of the construction site. As further discussed in Section 12, *Noise*, of Attachment B, Explanation of Checklist Determinations, noise barriers would be implemented, as needed, during each of the eight construction phases. Noise barriers would, to the extent feasible and required, surround the entire active construction area(s). In order to achieve effective sound attenuation, noise barriers would be approximately 12 feet in height and rated for a minimum of a 10 dBA reduction. Noise barriers could be made out of multi-layered sound-insulating materials, metal, wood, or any other material that limits the sensitive receptors' line-of-sight to the construction site and would achieve a 10 dBA reduction in noise levels. Any equipment operating outside of the confines of a noise barrier (e.g. generator sets) would require a portable noise shelter or housing to limit the noise and rated at the same 10 dBA reduction as the larger noise barrier. Similarly, if the noise barrier cannot form a continuous wall surrounding the construction area (i.e., to allow for access gates, etc.), portable shields would be used to cover gaps while simultaneously allowing access to construction site. Additional details regarding the duration of each phase and the equipment mix that will be used in each phase can be found in Appendix A, *Air Quality – CalEEMod Output Files.*

Construction Haul Route

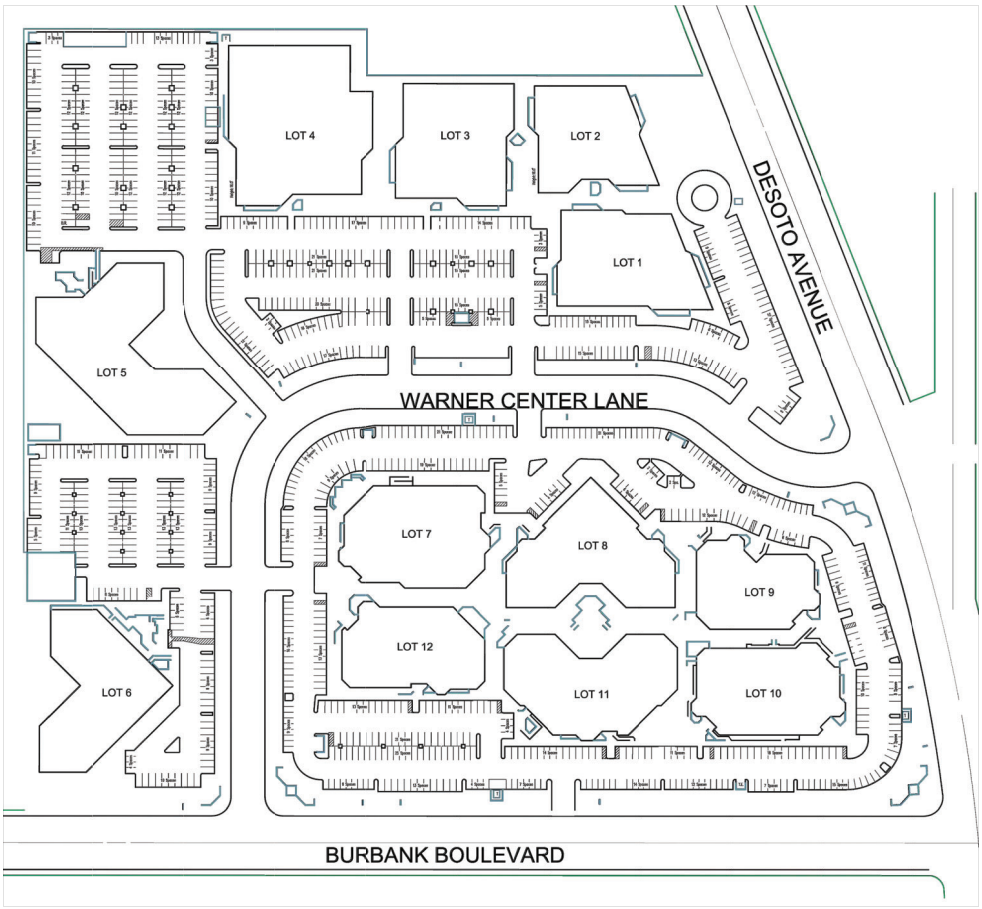
Project construction would require the use of two potential haul route options to and from the Project Site. As discussed on page WC-AQ-9 of the WC2035 FEIR, construction vehicles are required to avoid, to the extent feasible, travel on streets immediately adjacent to Canoga Park High School, Woodland Hills Academy Middle School, and Hart Elementary School throughout the construction phase to reduce potentially significant construction-related air quality impacts. All haul routes would be designed to comply with WC-AQ-9. Therefore, in order to avoid travel on De Soto Avenue, to the extent feasible, one of the following construction haul route would be implemented for each phase of the Project, as applicable, to provide the most direct route to the freeway: (1) trucks would exit on the south end of the Project Site and travel west on Burbank Boulevard, turn south onto Topanga Canyon Boulevard and then enter to the US-101 freeway; or (2) trucks would exit on the northern or eastern end of the Project Site and travel north on De Soto Avenue, west on Oxnard Street, south on Topanga Canyon Boulevard and then enter the US-101 freeway. If and to the extent these haul routes are determined to be infeasible, they may be modified in compliance with City policies, provided that LADOT approves any such modification.

6. Necessary Approvals

It is anticipated that approvals required for the Project would include, but may not be limited to, the following:

- Project Permit Compliance approval pursuant to the WC2035 Plan;
- Approval of a Vesting Tentative Tract Map;

- Grading, excavation, foundation and associated building permits; and
- Other permits and approvals as deemed necessary to implement the Project.



EXISTING SITE (2017)-

Total Floor Area - 340,339 SF
Total Surface Parking - 1,198 Spaces

PHASING NOTES

1. This project is a Phased Master Planned Project as defined by the WC 2035 Plan and as such is required to provide a Phasing Plan. The phasing plan includes the following for each phase:
   A. Building locations, land uses, building heights and floor area.
   B. Demolition schedule and retention schedule of existing buildings.
   C. Estimated completion dates.
   D. Parking allocations.
   E. Internal physical improvements including streets, sidewalks, open space, and other amenities.
   F. External physical improvements including streets, sidewalks, open space, and other amenities.
   G. Regional or sub-regional transportation/ mobility improvements.

2. The phasing plan presented here is an estimate of when each area will be constructed based on market conditions anticipated in the future. If the areas are constructed in a different order, the developer will coordinate with the appropriate City agencies through the Director of Planning to determine any additional requirements.

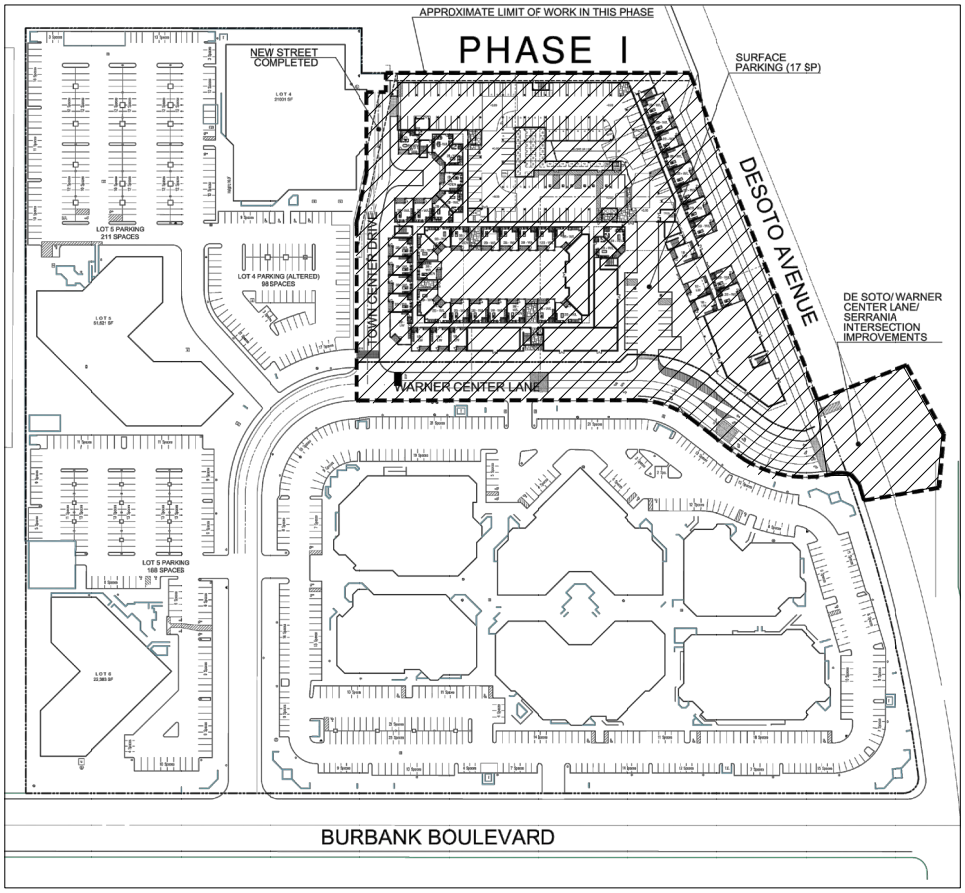
DPADR01.EPS

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-31
Existing Site Conditions

ESA



PHASE 1- CONSTRUCT BUILDING 2 (ESTIMATED COMPLETION 2022)

	Non-residential	Residential	Total
Building Area to be Demolished-	(60,930) SF	0 SF	
Existing Original Floor Area to Remain-	279,409 SF	0 SF	279,409 SF
New Floor Area Added in Previous Phases to Remain-	0 SF	0 SF	0 SF
New Floor Area Added this Phase-	61,456 SF	430,138 SF	491,594 SF
Total Floor Area-	340,865 SF	430,138 SF	771,003 SF
Original Surface Parking to be Demolished-	(223) Spaces		
Existing Surface Parking to Remain-	975 Spaces		
Existing Structured Parking to Remain-	0 Spaces		
New Structured Parking-	588 Spaces		
New Surface Parking-	17 Spaces		
Total Parking-	1,580 Spaces		

PHYSICAL IMPROVEMENTS

- Demolish three existing one-story office buildings located on the existing Lots 1, 2, and 3 and all related parking lots and landscaping. Designate as New Lot 1.
- Dedicate 18' at the west side of De Soto Avenue from the north property line to south side of Warner Center Lane and make all required improvements to accommodate widening the street as required by the WC 2035 Plan including new curb, gutter, paving and striping.
- Improve Warner Center Lane from De Soto Avenue west to the new Town Center Drive.
- Make improvements to the north and south sides of Warner Center Lane to accommodate a multi-lane intersection at De Soto Avenue and Serrania Avenue to a point approximately 250' east of De Soto Avenue. Make improvements to De Soto Avenue and Serrania Avenue to improve the intersection, including a new traffic signal if deemed required by the Department of Transportation.
- Construct the new sewer main and sewer laterals in Warner Center Lane from De Soto up to the most easterly manhole in Phase I and provide a stub for future extension.
- Construct the new storm drain to connect the proposed catch basin on the north side of Warner Center Lane. Extend the storm drain south up to the future catch basin and cap.
- Build Town Center Drive, except for the parallel parking on the west side, from Warner Center Lane extending north to a point about 25' away from the north property line.
- Adjust existing property lines through the adoption of the first unit map to accommodate the proposed new construction and to provide the allowable openings in the exterior walls of the existing one story office building to remain on existing Lot 4.
- Make adjustments to the existing surface parking lot serving existing Lot 4 as required to accommodate the new Town Center Drive.
- Construct a new seven-story mixed use building at the corner of De Soto Avenue and Warner Center Lane extending to the corner of Warner Center Lane and the new Town Center Drive. The building will include a 588 space parking structure, a 403 unit apartment building, and 12,439sf of restaurant/ retail space. 48 of the for-rent units are two story Work/live units located at grade level. The project will include an on-grade approximately 10,805sf courtyard with a pool and other amenities reserved for the resident's use.
- The street frontages at De Soto Avenue, Warner Center Lane and Town Center Drive between the curbs and the new building will be fully improved including parkway, sidewalks, street trees, and setbacks.
- New surface parking and publicly accessible open space with a focal point will be provided in a new courtyard opening to the south toward Warner Center Lane. 17 surface parking spaces and the vehicular entrance to the parking structure will be located in this area as well.

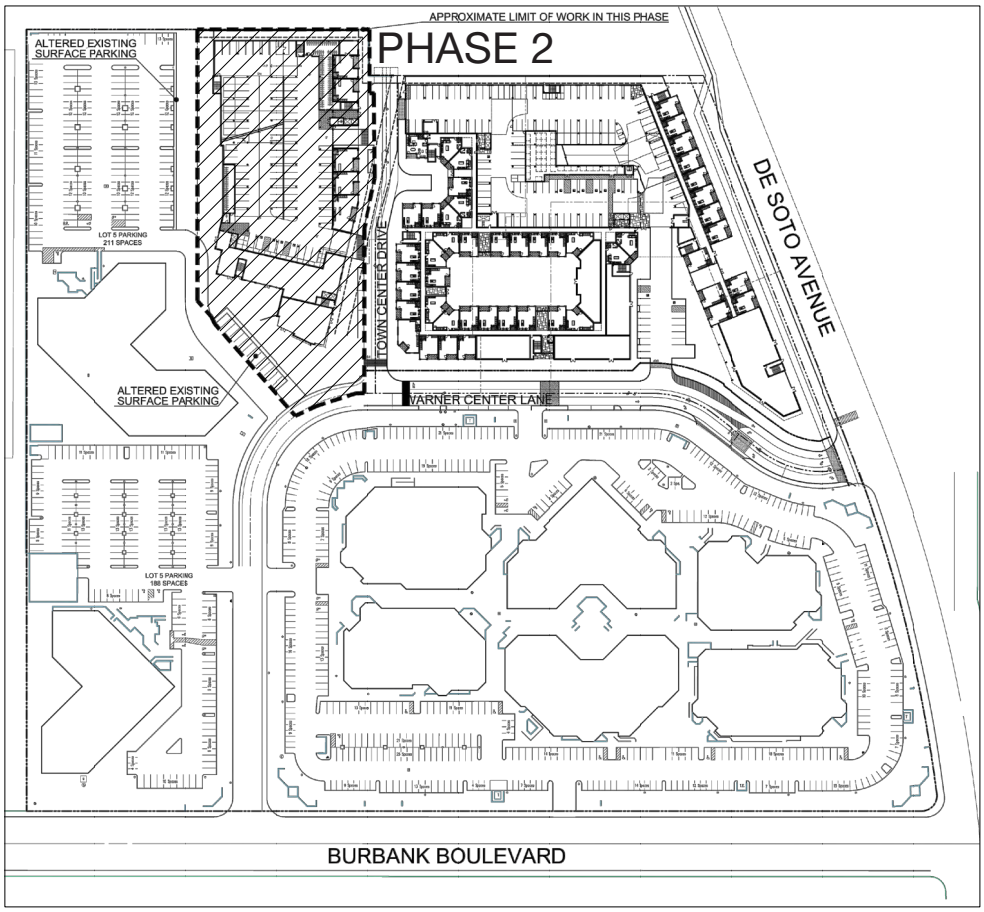
DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-32
Project Construction – Phase 1

ESA



PHASE 2- CONSTRUCT BUILDING 2 (ESTIMATED COMPLETION 2023)

	Non-residential	Residential	Total
Building Area to be Demolished-	(34,670) SF	0 SF	
Existing Original Floor Area to Remain-	244,739 SF	0 SF	244,739 SF
New Floor Area Added in Previous Phases to Remain-	61,456 SF	430,138 SF	491,594 SF
New Floor Area Added this Phase-	8,904 SF	223,892 SF	232,796 SF
Total Floor Area-	315,099 SF	654,030 SF	969,129 SF

Original Surface Parking to be Demolished-	(142) Spaces
Original Surface Parking to Remain-	833 Spaces
New Structured Parking from Previous Phases to Remain-	588 Spaces
New Surface Parking from Previous Phases to Remain-	17 Spaces
New Structured Parking this Phase-	318 Spaces
New Surface Parking this Phase-	3 Spaces
Total Parking-	1,759 Spaces

PHYSICAL IMPROVEMENTS

- Demolish one existing one-story office building located on the existing Lot 4 and the related parking lot and landscaping. Designate as New Lot 2.
- Alter the row of existing parking spaces on the existing Lot 4 that occur adjacent to the existing Lot 5 so that the spaces are accessible from the Lot 5 driveway.
- The portion of the driveway to the existing Lot 5 parking will be relocated so that it does not cross the property line west of the new Building 2.
- Make improvements to the small portion of north side of Warner Center Lane that abuts the Phase 2 Property.
- A seven-story mixed use building will be constructed that includes a 318space parking garage, 204 unit apartment building and approximately 3,265sf of restaurant space. 5 of the for-rent units are two story Work/live units located at grade level. Resident amenities will be provided inside the building and at the exterior courtyard with a pool located on top of the parking structure.
- The street frontages at Warner Center Lane and Town Center Drive between the curbs and the new building will be fully improved including parkway, sidewalks, street trees, and setbacks. A plaza that will be publicly accessible open space will be formed between the new building and Warner Center Lane that will require further development and will form a 'Town Center' in Phase 6.
- Construct new sewer main and sewer laterals in Warner Center Lane from the previous phase stub to the next phase manhole with a stub for future connection.
- Construct new storm drain to connect the proposed catch basin on the north side of Warner Center Lane.
- The west side of the property, on grade, adjacent to the new building, will be improved to incorporate additional resident amenities. The area will be fenced temporarily during Phase 2 but will be shared with the adjacent future building to the west in Phase 6.

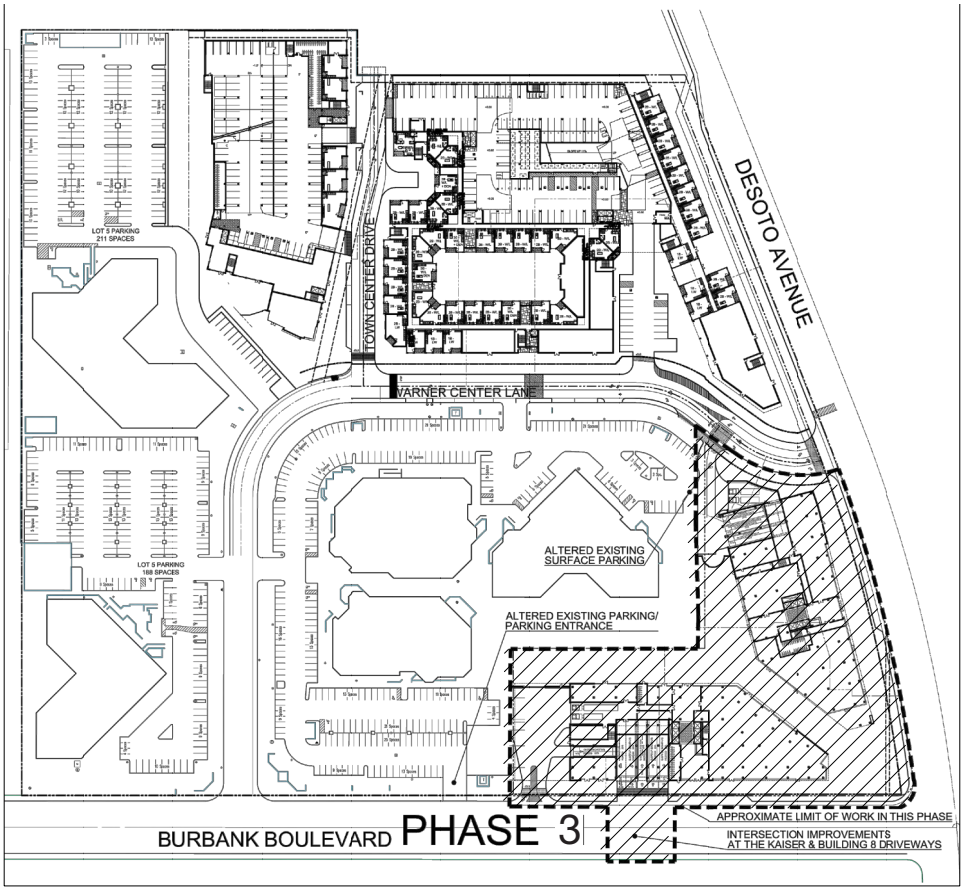
DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-33
Project Construction – Phase 2

ESA



PHASE 3- CONSTRUCT BLDGS. 8 & 9 (ESTIMATED COMPLETION 2024)

	Non-residential	Residential	Total
Building Area to be Demolished-	(60,000) SF	0 SF	
Existing Original Floor Area to Remain-	184,739 SF	0 SF	184,739 SF
New Floor Area Added in Previous Phases to Remain-	70,360 SF	654,030 SF	724,390 SF
New Floor Area Added this Phase-	476,158 SF	0 SF	476,158 SF
Total Floor Area-	731,257 SF	654,030 SF	1,385,287 SF

Original Surface Parking to be Demolished-	(189) Spaces
Original Surface Parking to Remain-	644 Spaces
New Structured Parking from Previous Phases to Remain-	906 Spaces
New Surface Parking from Previous Phases to Remain-	20 Spaces
New Structured Parking this Phase-	1,427 Spaces
New Surface Parking this Phase-	0 Spaces
Total Parking-	2,997 Spaces

PHYSICAL IMPROVEMENTS

- Demolish three existing one-story office buildings located on the existing Lots 9, 10, and 11 along with the necessary portions of existing parking lots and landscaping. Designate as New Lot 8.
- Dedicate 18' at the west side of De Soto Avenue from the south side of Warner Center Lane on the north end to Burbank Boulevard to the south. Make all required improvements to accommodate widening the street as required by the WC 2035 Plan including new curb, gutter, paving and striping.
- Make adjustments to the existing surface parking lots serving existing Lots 8, 9 and 12 as required to accommodate the new construction. The access from Burbank Boulevard to the existing parking lots will be moved to the west.
- Construct a new multi-lane driveway to access the parking garage of the new Building 8 that aligns with the existing driveway of the Kaiser Hospital on the south side of Burbank Blvd. Make improvements to the intersection per D.O.T. requirements including a traffic signal.
- Make necessary portions of lot line adjustments to accommodate all of the Phase III construction including site improvements and fire access.
- Construct two 15 story office buildings with two stories of below grade parking. The buildings will contain 1427 parking spaces in two below grade and 6 above grade levels. The below grade parking will be shared and continuous between the two buildings. Building 8 will include 236,710sf of office and 4,864sf of possible office/retail space. Building 9 will include 224,556sf of office space and 10,028sf of possible office/ retail space.
- The below grade parking for Building 8 will extend to the west under the delivery, visitor egress and fire access driveway leading to Burbank Blvd. The construction of this portion of the project during this phase will allow fire access and deliveries to be uninterrupted during the future construction of Building 7.
- The street frontages at De Soto Avenue and Burbank Boulevard between the curbs and the new buildings will be fully improved including parkway, sidewalks, street trees as necessary, and setbacks.
- Improvements will be made to the on grade portions of the site north of Building 8 and west of Building 9 that will form a large publicly accessible open space pedestrian adapted pathway. During this phase, the improvements will be a combination of permanent and temporary installations. Subsequent improvements to this space will occur in later phases.
- As part of this Phase, a plaza will be constructed at the corner of Burbank Boulevard and De Soto Avenue that includes a focal point. This plaza is intended to serve as the gateway to the project and the southeast gateway to Warner Center. A pedestrian adapted pathway will be provided between Buildings 8 and 9 that will connect this plaza to the pedestrian adapted pathway north of Building 8 and west of Building 9.
- Improve the portion of Phase III north of Building 9 to the curb of Warner Center Lane including the parkway, sidewalk, landscaping, etc.

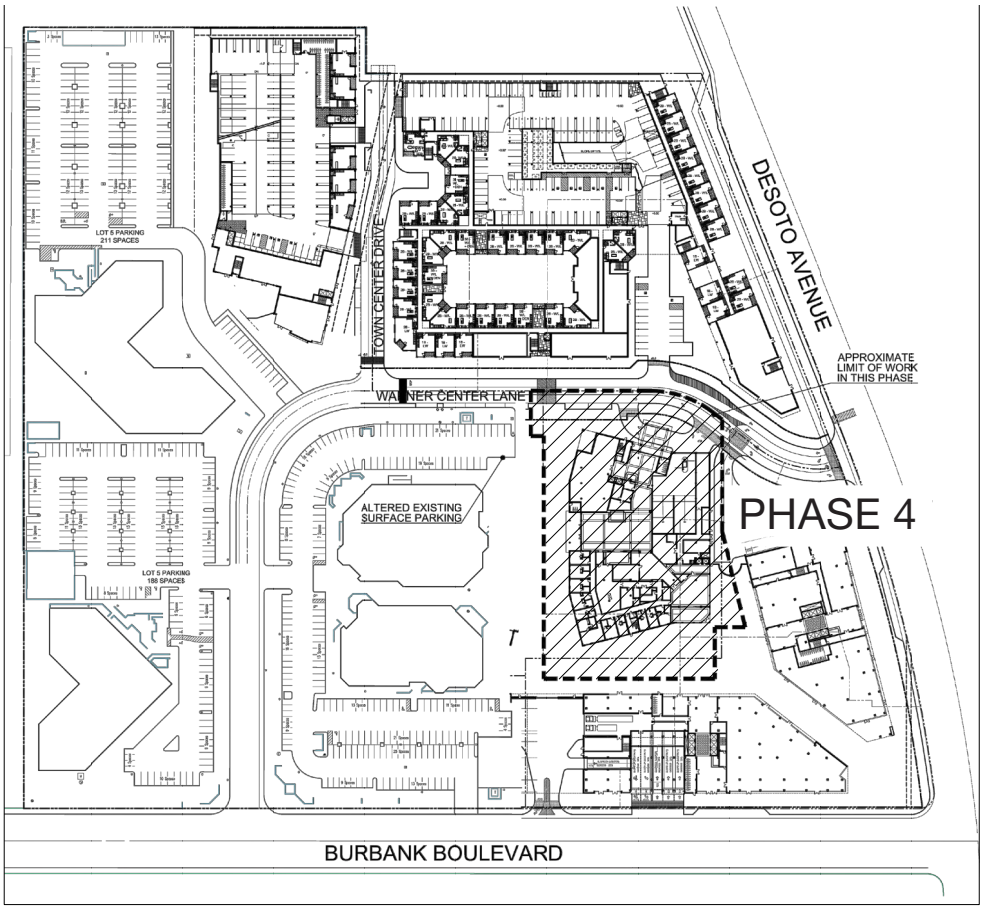
DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-34
Project Construction – Phase 3

ESA



PHASE 4- CONSTRUCT BUILDING 6 (ESTIMATED COMPLETION 2029)

	Non-residential	Residential	Total
Building Area to be Demolished-	(23,970) SF	0 SF	
Existing Original Floor Area to Remain-	160,769 SF	0 SF	160,769 SF
New Floor Area Added in Previous Phases to Remain-	546,518 SF	654,030 SF	1,200,548 SF
New Floor Area Added this Phase-	162,001 SF	0 SF	162,001 SF
Total Floor Area-	869,288 SF	654,030 SF	1,523,318 SF

Original Surface Parking to be Demolished-	(58) Spaces
Original Surface Parking to Remain-	586 Spaces
New Structured Parking from Previous Phases to Remain-	2,333 Spaces
New Surface Parking from Previous Phases to Remain-	20 Spaces
New Structured Parking this Phase-	193 Spaces (101 Req'd per LAMC)
New Surface Parking this Phase-	2 Spaces
Total Parking-	3,134 Spaces

PHYSICAL IMPROVEMENTS

- Demolish one existing one-story office building located on the existing Lot 8 and the related portions of the parking lot and landscaping. Designate as New Lot 6.
- Alter the existing surface parking serving Lot 7. The existing driveway from Warner Center Lane to the existing parking Lot will be not be relocated.
- Make adjustments to the portion of Warner Center Lane that abutt the Phase 4 site.
- A Lot Line adjustment will be made at this time that allows the Phase 4 construction to occur on a separate property. The lot line adjustment will also provide a separation of the new construction from the parking required to serve the existing buildings.
- A seven-story mixed use building will be constructed on the Phase 4 site that will include a 193 space parking garage, a 228 room hotel with amenities, and 4,466 sf of restaurant space.
- The improvements made to the on-grade portions of the site north of Building 8 and west of Building 9 will be completed in this phase. The temporary installations will be removed and the large publically accessible open space pedestrian adapted pathway will be completed up to the western limit of the Phase 4 work.
- An additional publicly accessible open space pedestrian adapted pathway is planned on the west side of the Phase 4 mixed use hotel building. The pathway will extend from Warner Center Lane and run south to the pathway north of Building 8. During this phase part of this area will be improved with permanent and temporary elements, including permanent focal elements and plazas. The completion of this pathway will happen in later phases.
- The street frontages at the private street, Warner Center Lane, between the curbs and the new buildings will be fully improved including parkway, sidewalks, street trees as necessary, and setbacks. This portion of the site will include a porte cochere/ drop off area for the hotel, parking garage driveway and delivery area.

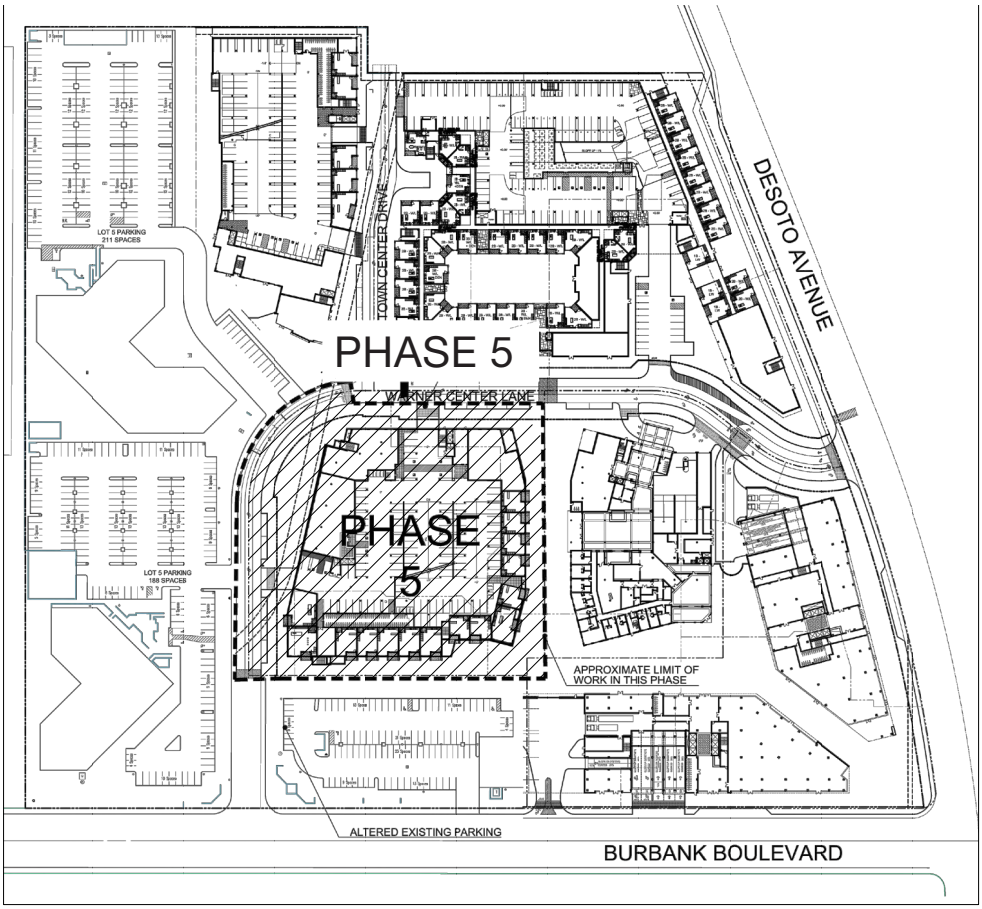
DPADR01.EPS

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-35
Project Construction – Phase 4

ESA



PHASE 5- CONSTRUCT BUILDING 5 (ESTIMATED COMPLETION 2031)

	Non-residential	Residential	Total
Building Area to be Demolished-	(41,580) SF		
Existing Original Floor Area to Remain-	119,189 SF	0 SF	119,189 SF
New Floor Area Added in Previous Phases to Remain-	708,519 SF	654,030 SF	1,362,549 SF
New Floor Area Added this Phase-	25,138 SF	269,556 SF	294,694 SF
Total Floor Area-	852,846 SF	923,586 SF	1,776,432 SF

Original Surface Parking to be Demolished-	(115) Spaces
Original Surface Parking to Remain-	471 Spaces
New Structured Parking from Previous Phases to Remain-	2,526 Spaces
New Surface Parking from Previous Phases to Remain-	22 Spaces
New Structured Parking this Phase-	403 Spaces
New Surface Parking this Phase-	9 Spaces
Total Parking-	3,431 Spaces

PHYSICAL IMPROVEMENTS

- Demolish two existing one-story office buildings located on the existing Lots 7 and 12 and the related portions of the parking lots and landscaping. Designate as New Lot 5.
- The portion of the existing parking lot at the northeast corner of Warner Center Lane and Burbank Boulevard not within the limits of the previous phase and this phase will remain as overflow parking for the adjacent uses until that site is improved in later phases.
- As part of this phase, the entire east side Warner Center Lane will be improved down to the southern limit of Phase V including new curb, gutter, paving, addition of parallel parking and striping.
- A seven-story mixed use building will be constructed on the Phase V site that will include a 403 space parking garage, a 168 unit condominium building, and 8,933sf of restaurant/ retail space. 15 of the fo Phase 5 ts are two story Work/live units located at grade level.
- The improvements made to the on-grade portions of the site north of Building 8 and west of Building 9 will be extended to Warner Center Lane to the east in this phase. The improvements on the north side of the extension will be permanent and the improvements on the south side will be temporary. The southern side of the pedestrian accessible pathway extension will be improved at a later phase.
- The publicly accessible open space pedestrian adapted pathway that was partially constructed on the west side of the Phase IV mixed use hotel building will be built out as part of this phase. Any temporary construction will be removed and all areas will now be cor Phase 4 rmanent improvements.
- The street frontage at Warner Center Lane between the curbs and the new buildings will be fully improved including parkway, sidewalks, street trees as necessary, and setbacks.
- The street/ driveway frontages at south side and east side of Warner Center Lane between the curbs and the new building will be fully improved including the parkway, sidewalks, street trees, and improved setbacks.
- Construct the new sewer main and sewer laterals in Warner Center Lane from the previous phase stub up to the end of the proposed sewer main.
- Construct a catch basin on the south side of Warner Center Lane and connect to the storm drain constructed per unit map 1.

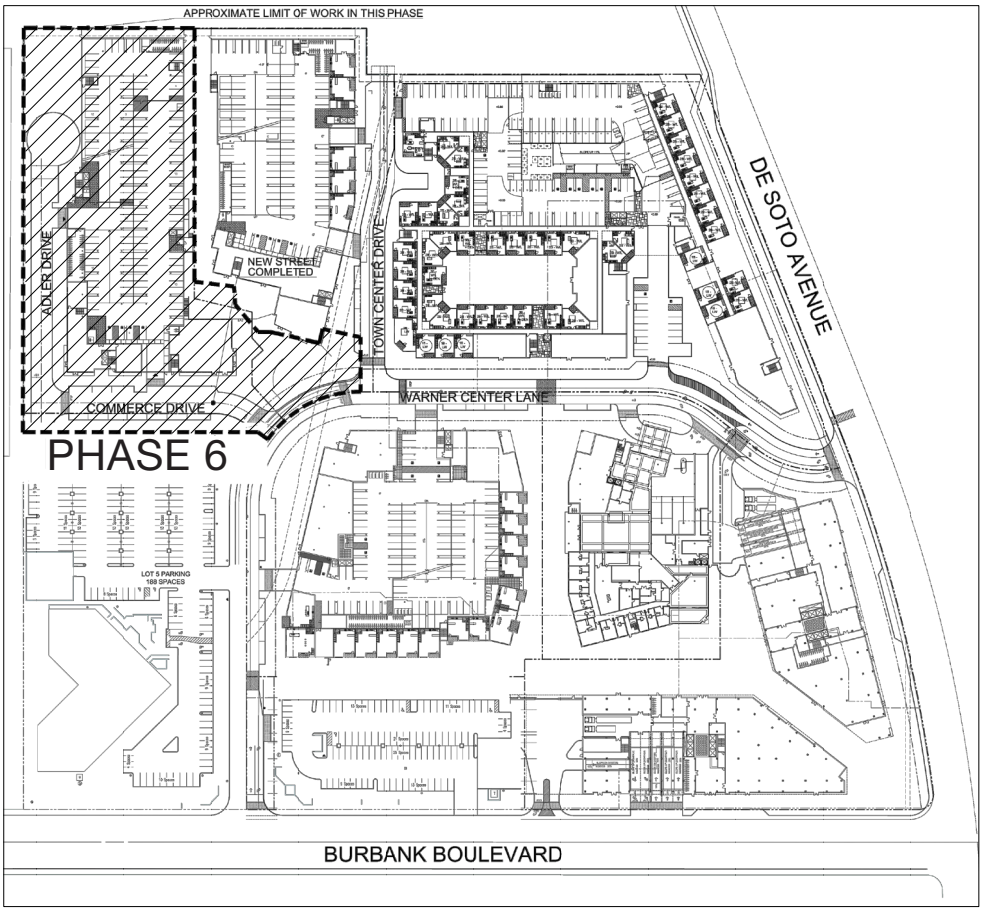
DPADR01.EPS

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-36
Project Construction – Phase 5

ESA



PHASE 6- CONSTRUCT BUILDING 3 (ESTIMATED COMPLETION 2031)

	Non-residential	Residential	Total
Building Area to be Demolished-	(57,794) SF		
Existing Original Floor Area to Remain-	61,395 SF	0 SF	61,395 SF
New Floor Area Added in Previous Phases to Remain-	733,657 SF	923,586 SF	1,657,243 SF
New Floor Area Added this Phase-	5,100 SF	251,927 SF	257,027 SF
Total Floor Area-	800,152 SF	1,175,509 SF	1,975,661 SF

Original Surface Parking to be Demolished-	(172) Spaces
Original Surface Parking to Remain-	299 Spaces
New Structured Parking from Previous Phases to Remain-	2,929 Spaces
New Surface Parking from Previous Phases to Remain-	31 Spaces
New Structured Parking this Phase-	403 Spaces
New Surface Parking this Phase-	3 Spaces
Total Parking-	3,665 Spaces

PHYSICAL IMPROVEMENTS

- Demolish one existing two-story office building located on the existing Lot 5 along with the necessary portions of existing parking lots and landscaping. Designate as New Lot 3.
- Construct the new private driveway, Commerce Drive, to its full width including new curb, gutter, paving, parallel parking and striping.
- A lot line adjustment along the south side of the property is needed to accommodate a future phase.
- Construct the portion of the new private driveway, Adler Drive, running north of Commerce Drive and all improvements to provide fire access for the Phase 6 site and vehicular access to the second driveway to the proposed building's parking structure.
- A seven-story mixed use building will be constructed that includes a 403 space parking garage, 234 unit apartment building and 5,100sf of restaurant/ retail space. Resident amenities will be provided inside the building and at the exterior courtyard with a pool located on top of the parking structure.
- The street frontages at the private street, Warner Center Lane, and the private driveways Town Center Drive and Adler Drive, between the curbs and the new building will be fully improved including parkway, sidewalks, street trees, and setbacks. The west side of Adler Drive up to the property line and south to the Phase 6 limit will be landscaped.
- The plaza that forms the 'Town Center' that was begun in Phase 2 will be added to and completed, forming additional publicly accessible open space that now includes a focal point. A children's public playground will be added to the publicly accessible open space.
- The private courtyard on the east side of the property, on grade, located between the new Building 3 and Building 2 will be completed. The temporary fence built during Phase 2 will be demolished and improvements will be made so that the courtyard and amenities can be shared between both properties.

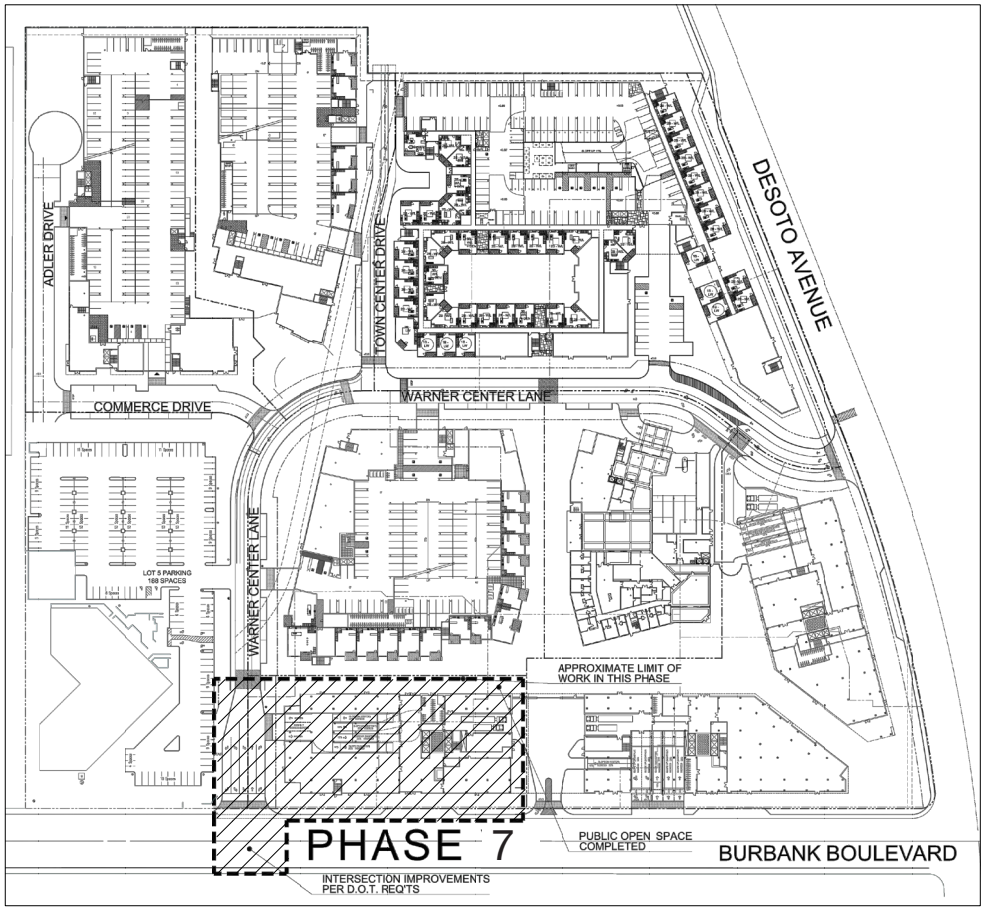
DPADR01.EP

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-37
Project Construction – Phase 6

ESA



PHASE 7- CONSTRUCT BUILDING 7 (ESTIMATED COMPLETION 2033)

	Non-residential	Residential	Total
Building Area to be Demolished-	0 SF		
Existing Original Floor Area to Remain-	61,395 SF	0 SF	61,395 SF
New Floor Area Added in Previous Phases to Remain-	738,757 SF	1,175,509 SF	1,914,266 SF
New Floor Area Added this Phase-	262,222 SF	0 SF	262,222 SF
Total Floor Area-	1,062,374 SF	1,175,509 SF	2,237,883 SF
Original Surface Parking to be Demolished-	(110) Spaces		
Original Surface Parking to Remain-	189 Spaces		
New Structured Parking from Previous Phases to Remain-	3,332 Spaces		
New Surface Parking from Previous Phases to Remain-	34 Spaces		
New Structured Parking this Phase-	801 Spaces		
New Surface Parking this Phase-	0 Spaces		
Total Parking-	4,356 Spaces		

PHYSICAL IMPROVEMENTS

- Clear the site including the remaining portion of the existing parking lot that served former Lot 12. Designate as New Lot 7.
- Construct a 15 story office building with three stories of below grade parking. The below grade parking will have openings to and be connected to the below grade parking of Buildings 8 and 9. The building will contain 801 parking spaces in two and one half below grade and 7 above grade levels. The building will include 250,352sf of office and 11,870sf of possible office/ retail space.
- Make improvements to the east and west sides of Warner Center Lane to accommodate a multi-lane intersection at Burbank Boulevard. Make improvements to Burbank Boulevard to improve the intersection, including a new traffic signal, per the requirements of the Department of Transportation.
- The street frontages at Warner Center Lane and Burbank Boulevard, between the curbs and the new building will be fully improved including parkway, sidewalks, street trees, and setbacks. Any temporary construction installed during Phase 5 along Warner Center Lane will be removed.
- The north side of the Phase 7 site will be improved completing the publically accessible open space pedestrian adapted pathway system for the large portion of the site bordered by Warner Center Lane, De Soto Avenue and Burbank Boulevard. Any temporary construction installed during Phase 5 will be removed.

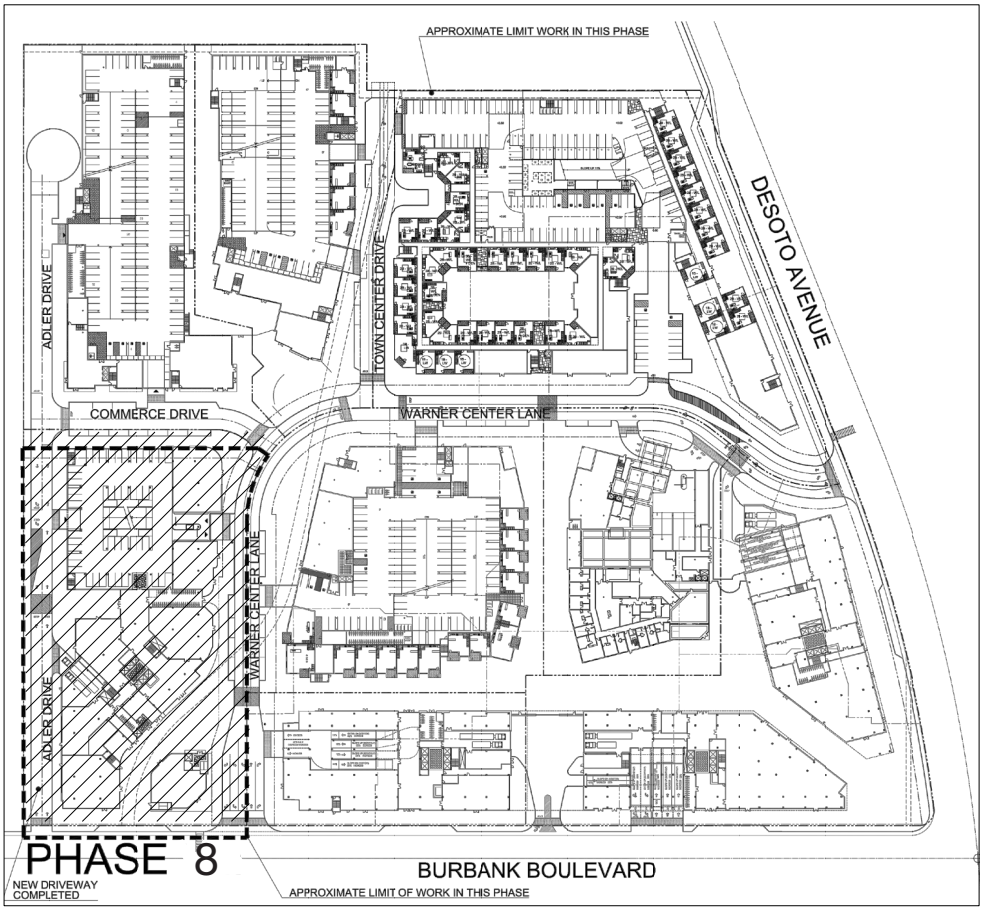
DPADR01.EPS

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-38
Project Construction – Phase 7

ESA



PHASE 8- CONSTRUCT BLDG 4 & 4A (ESTIMATED COMPLETION 2035)

	Non-residential	Residential	Total
Building Area to be Demolished-	(61,395) SF	0 SF	
Existing Original Floor Area to Remain-	0 SF	0 SF	
New Floor Area Added in Previous Phases to Remain-	1,000,979 SF	1,175,509 SF	
New Floor Area Added this Phase-	457,776 SF	0 SF	
Total Floor Area-	1,458,755 SF	1,175,509 SF	2,634,264 SF
Original Surface Parking to be Demolished-	(189) Spaces		
Original Surface Parking to Remain-	0 Spaces		
New Structured Parking from Previous Phases to Remain-	4,133 Spaces		
New Surface Parking from Previous Phases to Remain-	34 Spaces		
New Structured Parking this Phase-	1,373 Spaces		
New Surface Parking this Phase-	11 Spaces		
Total Parking-	5,551 Spaces		

PHYSICAL IMPROVEMENTS

- Demolish an existing three-story office building located on the existing Lot 6 including the parking lots and landscaping. designate as New Lot 4. This will complete the demolition of all existing site elements that existed before Phase 1.
- Extend Adler Drive from the portion built during Phase VI on the north side, to the south connecting it with Burbank Boulevard.
- A 24-story mixed use, primarily office building (designated as Building 4) will be constructed. The building will include parking two levels below grade and six levels above grade for 1,373 vehicles, 429,128sf of office space, 4,897sf of restaurant/ retail space and 15,741sf of retail space.
- A free-standing approximately 8,010sf freestanding restaurant/ retail building with Community Space on the second floor (designated as Building 4A) will be constructed on the Phase 8 property at the corner of Burbank Boulevard and Warner Center Lane. Parking for this building will be located in Building 4.
- The street frontages at Warner Center Lane, Adler Drive, and Burbank Boulevard between the curbs and the new building will be fully improved including parkway, sidewalks, street trees, and setbacks. The west side of Adler Drive up to the property line will be landscaped.
- The Publicly Accessible Open Space Pedestrian Adapted Pathway that extends throughout the rest of the site on the east side of Warner Center Lane will be extended through the Phase 8 site between the 24 story mixed use building 4 and 4a. The extension of this path will complete the system of paths and nodes extending over all phases.

DPADR01.EPS

SOURCE: Van Tilburg, Banvard & Soderbergh, AIA, 2019

De Soto / Burbank Master Plan Project

Figure A-39
Project Construction – Phase 8

ESA

ATTACHMENT B
Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles (City) Tiered Initial Study (Tiered IS) Checklist for the proposed Project. The responses below explain why the Project would not result in any significant environmental impacts that have not been adequately addressed in the prior WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), so that a second-tier environmental impact report (EIR) is not required for the Project. Each response evaluates how the Project (as defined in Attachment A, Project Description) may affect the existing environmental conditions at the Project Site and the surrounding environment and to the extent required, includes additional, project-specific analysis of certain environmental topics that were not fully analyzed in the WC2035 Plan FEIR.

1. Aesthetics

Analysis in WC2035 Plan FEIR

Visual Character

The WC2035 Plan FEIR stated that the implementation of the WC2035 Plan was anticipated to substantially increase density and increase the height of structures, which would change the character of Warner Center. It noted, however, that the WC2035 Plan includes design standards and guidelines, which include the "Urban Design Standards" in Section 6.2.6.2 of the WC2035 Plan and the "Urban Design Guidelines" in Appendix F thereto, are intended to ensure that development would occur in a manner that is visually pleasing and not out of character with the current surroundings and uses in the WC2035 Plan area. It further noted that the WC2035 Plan requires paseos and open spaces, which are anticipated to provide visual relief and be much more actively used by residents and workers, as well as extensive landscaping, including streetscaping requirements intended to ensure an attractive street environment that encourages pedestrian activity. The WC2035 Plan FEIR concluded that, with adherence to those design standards and guidelines, the WC2035 Plan's impact related to visual character would be less than significant, and that the recommended mitigation measures would ensure that the impact would be less than significant. (WC2035 Plan DEIR, p. 4.8-18)

Scenic Vistas and Views

As discussed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), the WC2035 Plan area is dominated by development that is urban and suburban in character, including a mix of commercial, industrial, and single- and multi-family residential uses. With its location in the San Fernando Valley basin, the WC2035 Plan area has backdrop views of the Santa Susana and San

Gabriel Mountains to the north and the Santa Monica Mountains to the south, which are visible from WC2035 Plan area roadways. These views are highly obstructed and interrupted from street level due to intervening development, landscaping, power lines and other urban elements. As such, the WC2035 Plan FEIR stated that views are generally limited to the suburban surroundings. It also determined that there are no designated scenic highways in the WC2035 Plan area. (WC2035 Plan DEIR, pp. 4.1-1-2, 4.1-9-10)

The WC2035 Plan FEIR then discussed that, while implementation of the WC2035 Plan would result in some impairment of existing views, Warner Center is already an urbanized area where most publicly available ground-level views are already impaired. The anticipated increase in density could further impair some mid- and long-distance street-level views, but the density would be appropriate to the urban form of the City (designated transit oriented centers with generally lower density surrounding the urban cores), and views of local mountains along north-south streets and boulevards would substantially remain. For these reasons, the WC2035 Plan's impact on scenic vistas and views would be less than significant. (WC2035 Plan DEIR, p. 4.1-19)

Light and Glare

The WC2035 Plan FEIR discussed that the WC2035 Plan area is in an urban area with medium to high levels of ambient lighting and glare. Parking lots and structures and street lights create higher than average nighttime illumination in the southern portion and along the perimeter of the WC2035 Plan area. Residential neighborhoods to the north, east and west of the WC2035 Plan area have generally low levels of nighttime illumination, but that even these areas are surrounded by densely urban uses which contain high levels of ambient lighting. (WC2035 Plan DEIR, pp. 4.1-11-12)

The WC2035 Plan FEIR then discussed the various ways in which the urban design standards and guidelines in the WC2035 Plan would reduce the light and glare associated with development projects. These include lighting requirements related to security lighting, signage and parking garages. The lighting requirements are aimed to minimize light and glare impacts to adjacent uses, as well as to highlight architectural features and to promote public safety. (WC2035 Plan DEIR, p. 4.1-19)

The urban design standards and guidelines also specify that interior garage lighting should not produce glaring sources of light that could impact adjacent residential units, while providing safe and adequate lighting levels. Exterior lighting (building and landscape) should be integrated with the building design and promote public safety. Architectural lighting should be visible to pedestrians and should accentuate major architectural features. Landscape lighting should be of a character and scale that would be visible to pedestrians and would highlight landscape features. Exterior lighting should be shielded to reduce glare and eliminate light being cast into the night sky. Security lighting should be integrated into the architectural and landscape lighting system. (WC2035 Plan DEIR, p. 4.1-20)

The WC2035 Plan FEIR concluded that, with the implementation of the urban design standards and guidelines and adherence to recommended Mitigation Measures WC-AES-9 through WC-

AES-27, the WC2035 Plan would have a less-than-significant impact with regard to light and glare. (WC2035 Plan DEIR, p. 4.1-20)

Shade/Shadow

As discussed in the WC2035 Plan FEIR, shadow-sensitive uses include existing residential uses within the WC2035 Plan area, as well as residential areas near the WC2035 Plan area, including residential uses along De Soto Avenue (near Vanowen Street) and along Topanga Canyon Boulevard (also near Vanowen Street), but that, existing structures are already casting shadows in those areas. (WC2035 Plan DEIR, pp. 4.1-11, 4.1-20)

The WC2035 Plan FEIR determined that, given the street widths and building articulation required under the urban design standards and guidelines in the WC2035 Plan, it was not anticipated that any significant shadow impact would occur outside of Warner Center. It also stated, however, that project-specific analysis of potential shadow impacts may be required to ensure that a development project would not have a significant impact on any shadow-sensitive uses. Pending such project-specific shadow analyses, the WC2035 Plan's shadow impact was considered potentially significant. (WC2035 Plan DEIR, pp. 4.1-20-21)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended 28 mitigation measures, designated as WC-AES-1 through WC-AES-28, with respect to potentially significant impacts or less than significant impacts related to aesthetics (WC2035 Plan FEIR, p. V-2-5). Of those mitigation measures, the following are potentially applicable to the Project:

WC-AES-1 All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the decision maker.

WC-AES-2: Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.

WC-AES-3: The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a public street or alley, pursuant to LAMC Section 91.8104.15.

WC-AES-4: Multiple temporary signs in the store windows and along the building walls are not permitted.

WC-AES-7: All signs in the Warner Center Regional Core Comprehensive Specific Plan *[sic]* area shall meet the following criteria:

a) The building and ground area around signs shall be properly maintained at all times. All unused mounting structures, hardware

and wall perforations from any previous sign shall be removed and building surfaces shall be restored to their original condition.

b) All signage copy shall be properly maintained and kept free from damaged sign material and other unsightly conditions, including graffiti.

c) Any sign structure shall be at all times kept in good repair and maintained in a safe and sound condition and in conformance with all applicable codes.

d) Razor wire, barbed wire, concertina wire or other barriers preventing unauthorized access to any sign, if any, shall be hidden from public view.

e) The signage copy must be repaired or replaced immediately upon tearing, ripping, or peeling or when marred or damaged by graffiti.

f) No access platform, ladder, or other service appurtenance, visible from the sidewalk, street or public right-of-way, shall be installed or attached to any sign structure.

g) Existing signs that are no longer serving the current tenants, including support structures, shall be removed and the building facades originally covered by the signs shall be repaired/resurfaced with materials and colors that are compatible with the facades.

WC-AES-8: The material, construction, mounting, and adhesive methods of all proposed signage shall be subject to the approval of the Fire Department and the Department of Building and Safety.

WC-AES-9: All lighting related to construction activities shall be shielded or directed to restrict any direct illumination onto property located outside of the construction area boundaries that is improved with light-sensitive uses.

WC-AES-10: Exterior lighting shall incorporate fixtures and light sources that focus light onto project sites to minimize light trespass.

WC-AES-11: Lighting of individual projects shall comply with LAMC Section 93.0117. As such, lighting shall not cause more than two footcandles of lighting intensity or direct glare from the light source at any residential property.

WC-AES-12: All buildings, parking structures, and signage within Warner Center shall be prohibited from the using highly reflective building materials such as mirrored glass in exterior façades. Examples of commonly used non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass, and would likely include additional materials as technology advances in the future.

WC-AES-13: Buildings shall not include large areas of reflective surfaces that could reflect light from signage into surrounding areas. No high brightness special effects lighting with brightness levels that shall exceed the lighting

levels of permitted signage would be allowed. Buildings, signage or thematic elements shall not incorporate reflective building materials or provide a source of auto headlight-related glare in proximity to glare sensitive uses.

WC-AES-14: Outdoor lighting shall be designed and installed with shielding, so that the light source cannot be seen from adjacent residential uses.

WC-AES-15: The exteriors of buildings shall be constructed of materials such as high performance tinted non-reflective glass and/or pre-cast concrete or fabricated wall surfaces.

WC-AES-16: Prior to issuance of a building permit for signage displays, a lighting design expert shall develop plans and specifications for the proposed lighting displays, to identify maximum luminance levels for the displays. The City and lighting expert shall review and monitor the installation and testing of the displays, in order to insure compliance with all City lighting regulations and these mitigation measures.

WC-AES-17: Each applicant (and successor) and/or its lighting design expert shall implement the following protocol to determine compliance with all City lighting regulations and these mitigation measures no later than 6 months after certificate of occupancy:

a) A representative testing site shall be established on or next to those light sensitive receptors that have the greatest exposure to signage lighting on each facades of a development.

b) A light meter mounted to a tripod at eye level, facing project buildings, should be calibrated and measurements should be taken to determine ambient light levels with the sign on.

c) An opaque object (a board) should be used to block out the view of the sign from the light meter, at a distance of at least 4 feet away from the tripod and blocking the light meter's view of the building. A reading should be taken to determine the ambient light levels with the sign off.

d) The difference between the two would be the amount of light the sign casts onto the sensitive receptor.

e) An alternate acceptable method to measure light levels would be to use the same tripod and same light meter, but to turn on and off the signage. This method takes more coordination, but is more accurate.

WC-AES-27: Each applicant (or successors as appropriate) shall submit a conceptual signage and lighting design plan to the Department of City Planning to establish lighting standards and guidelines.

WC-AES-28: As applicable, individual discretionary projects will conduct further site-specific analysis to determine whether adjacent sensitive uses could be impacted by proposed structures. The City shall require that proposed

structures be designed to minimize shade/shadow impacts to sensitive uses to the extent reasonable and feasible.

As discussed below, all of these mitigation measures, other than WC-AES-28, are recommended as mitigation measures for the Project. In compliance with Mitigation Measure WC-AES-28 (as well as Section 6.1.2.2.5 of the WC2035 Plan), a shade/shadow study was conducted for the Project, which is discussed below. As such, the requirement in Mitigation Measure WC-AES-28 have been satisfied. Several mitigation measures recommended in the WC2035 Plan FEIR, but not listed above, do not apply to the Project, including Mitigation Measures WC-AES-5, WC-AES-6, and WC-AES-18 through WC-AES-26, which have limited application to digital display and animated signs that are not proposed as part of the Project. Furthermore, such display types are not permitted in the Commerce District under the Warner Center Supplemental Sign District Ordinance (Ordinance No. 183147, p. 13).

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts related to aesthetics, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

Would the project:

(a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) stated that the WC2035 Plan area is densely developed with structures of varying heights and landscaping (in the form of mature trees) that block views of the local mountains. Implementation of the WC2035 Plan would result in an overall increase in density in the WC2035 Plan area (which includes the Project Site) thereby resulting in some impairment to existing views in an already urbanized area where most of the publicly available ground-level views are currently obstructed.

However, while implementation of the WC2035 Plan would result in some impairment of existing views, Warner Center is already an urbanized area where most publicly available ground-level views are already impaired. The anticipated increase in density could further impair some mid- and long-distance street-level views, but the density would be appropriate to the urban form of the City (designated transit oriented centers with generally lower density surrounding the urban cores), and views of local mountains along north-south streets and boulevards would substantially remain. The WC2035 Plan FEIR therefore concluded that WC2035 Plan's impact on scenic vistas and views would be less than significant. (WC2035 Plan DEIR, pp. 4.1-18-19)

This analysis applies fully to the Project and the Project Site. The Project Site is already fully developed with the 12 Existing Buildings. While the density and height of the New Buildings would exceed the density and height of the Existing Buildings, and therefore further impair views, the proposed development is consistent with the existing urbanized character of Warner Center and is appropriate for the area.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact on scenic vistas.

Therefore, the Project's impact on scenic vistas and views would be consistent with the impact contemplated in the WC2035 Plan FEIR.

For these reasons, the Project would not have a substantial adverse effect on a scenic vista. Therefore, the impact would be less than significant and was adequately addressed in the WC2035 Plan FEIR.

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?

Less Than Significant Impact. The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) determined that there are no designated scenic highways in the WC2035 Plan area (WC2035 Plan DEIR, p. 4.1-10). Therefore, it implicitly concluded that implementation of the WC2035 Plan would not result in damage to scenic resources such as trees, rock outcroppings, historic buildings, or other recognized desirable aesthetic natural features within a City-designated scenic highway. Given that the WC2035 Plan area includes the Project Site, there is no City-designated scenic highway within or adjacent to the Project Site. Moreover, the Project Site is already fully developed with a corporate office park and there are no scenic resources, rock outcroppings, historical buildings or other desirable aesthetic natural features on the Project Site.

Therefore, the Project would not 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. Accordingly, this impact would be less than significant and was adequately addressed in the WC2035 Plan FEIR.

(c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact with Mitigation Incorporated. The WC2035 Plan FEIR stated that the implementation of the WC2035 Plan was anticipated to substantially increased density and increase the height of structures, which would change the character of Warner Center. It noted, however, that the WC2035 Plan includes design standards and guidelines, which include the "Urban Design Standards" in Section 6.2.6.2 of the WC2035 Plan and the "Urban Design Guidelines" in Appendix F thereto, are intended to ensure that development would occur in a manner that is visually pleasing and not out of character with the current surroundings and uses in the WC2035 Plan area. It further noted that the WC2035 Plan requires paseos and open spaces, which are anticipated to provide visual relief and be much more actively used by residents and workers, as well as extensive landscaping, including streetscape requirements intended to ensure

an attractive street environment that encourages pedestrian activity. The WC2035 Plan FEIR concluded that, with adherence to those design standards and guidelines, the WC2035 Plan's impact related to visual character would be less than significant, and that the recommended Mitigation Measures WC-AES-1 through WC-AES-8 and WC-AES-28 would ensure that the impact would be less than significant. (WC2035 Plan DEIR, p. 4.8-18)

The analysis in the WC2035 Plan FEIR adequately addresses the Project's impact on visual character or quality. The Project provides for replacement of the Existing Buildings and associated surface parking lots with a new mixed-use development, which would increase the overall development density on the Project Site. However, the Project has been designed to comply with the development standards in the WC2035 Plan and for general consistency with Urban Design Guidelines, in Appendix F thereto, which would ensure that the Project will be visually pleasing and consistent with the character of the current surrounding urbanized area.

As part of the Project, the Project Site would be improved with generous amounts of PAOS and excess open space areas, including, but not limited to, landscape and hardscape features, focal points and seating that more than satisfy the PAOS requirements in the WC2035 Plan. The PAOS areas would serve to connect the Project to the adjoining public streets, connect buildings on the Project Site together, and create a pleasant pedestrian experience for occupants, users and visitors of the Project.

The Project includes approximately 121,683 square feet (or approximately 2.79 acres, which is approximately 11.66 percent of the net lot area) of PAOS, which is greater than the minimum PAOS required in Section 6.2.2 of the WC2035 Plan.

Furthermore, the Project includes Warner Center Lane, a private street that qualifies as a "New Street" under the WC2035 Plan. Pursuant to Section 6.2.2.3.2 of the WC2035 Plan, the inclusion of this New Street reduces the Project's PAOS requirement by 50 percent, from 15 percent to 7.5 percent of the net lot area. This translates to a reduction in the minimum PAOS required from 156,345 square feet, or 3.59 acres, to approximately 78,172.6 square feet, or 1.80 acres. However, as previously discussed, the Project requires two Incentivized Uses in order to ascend the Graduated FAR Table use mix for the Commerce District. One of the Incentivized Uses provided is a minimum of 50 percent more PAOS than is required by Section 6.2.2 of the WC2035 Plan. As a result, the PAOS required for the proposed Project increases by 50 percent, from 1.8 acres to approximately 2.69 acres. Therefore, the 2.79 acres of PAOS included in the Project exceeds the required PAOS of 2.69 acres.

The Project also includes three Pedestrian Adapted Pathways (PAPs), although only one is required under Section 6.2.5.3.1(b) of the WC2035 Plan. The PAPs function as portions of the PAOS. One PAP would run east/west and provide public street access into and through the Project Site, from the southeast corner to Burbank Boulevard west of Warner Center Lane, and would provide connections to two other proposed north/south running PAPs located between Buildings 5 and 6 and Buildings 6 and 9, respectively. Focal points and plazas are also proposed throughout the Project and within PAOS areas. There are a total of eight focal points/plazas, although only one focal point is required under Section 6.2.2.4.3 of the WC2035 Plan. Focal points would feature

built-in seating and/or sculptures, enhanced paving and tables and chairs. The proposed PAOS areas are contiguously located throughout the Project Site, except where interrupted to allow for the location of right-of-way (i.e., Warner Center Lane) or driveways.

The New Buildings' appearances have been designed to be distinguished from the surrounding streets and neighboring buildings. As depicted in Figures A-6 to A-25, the New Buildings have been designed to include differentiation between ground-floor and upper-floor uses, as well as variations in depth on the sides of the structures. By incorporating a wide variety of building materials to create visual interest, in coordination with breaks in the vertical and horizontal planes achieved through changes in color and material, the design avoids a monolithic or flat appearance.

Landscaping for the Project would be provided in publicly accessible and private open space areas, in compliance with the WC2035 Plan's requirements. A landscape plan has been prepared as part of the Project, as conceptually depicted in Figures A-28 to A-30, and it is intended to ensure an attractive setting that will enhance the Project Site's relationship to surrounding development.

Currently, the Project Site has numerous mature, ornamental trees, bushes and shrubs, and none of the trees on the Project Site are protected by City or State law. All 569 existing trees on the Project Site and would be removed as part of the Project. However, 542 of those trees exceed 4 inches in diameter at breast height and, therefore, would be replaced at a 2:1 ratio in accordance with Mitigation Measure WC-BIO-2. As such, 1,084 new trees would be planted onsite. In addition, all of the 28 street trees that would be removed exceed 4 inches in diameter at breast height, so they would be replaced with 56 new street trees.

Moreover, as previously discussed, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact on visual character and quality.

Therefore, with adherence to the urban design standards and guidelines in the WC2035 Plan, the Project would not substantially degrade the existing visual character or quality of the WC2035 Plan area or its surroundings, and the impact would therefore be less than significant. As stated in the WC2035 Plan FEIR, compliance with Mitigation Measure WC-AES-1 through WC-AES-8 would help ensure that this impact would be less than significant. This impact was adequately addressed in the WC2035 Plan FEIR.

With respect to shade and shadow, the WC2035 Plan FEIR determined that, given the street widths and building articulation required under the urban design standards and guidelines in the WC2035 Plan, it was not anticipated that any significant shadow impact would occur outside of Warner Center. It also stated, however, that project-specific analysis of potential shadow impacts may be required to ensure that a development project would not have a significant impact on any shadow-sensitive uses. (WC2035 Plan DEIR, pp. 4.1-20-21)

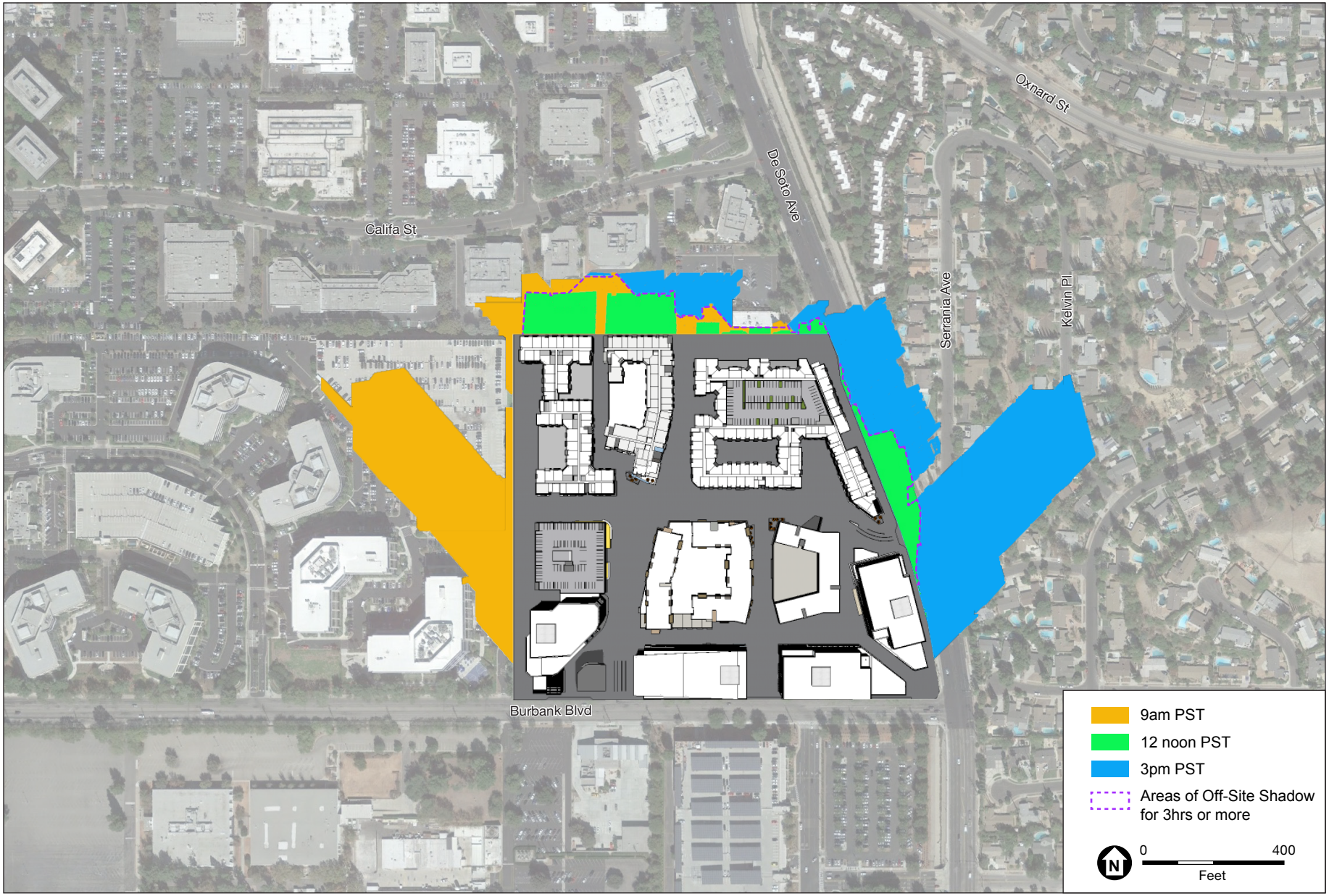
The WC2035 Plan quantifies this requirement. Although building heights in the WC2035 Plan area are unlimited, in order to ensure that potential impacts from shade/shadows would be considered, Section 6.1.2.5.5 requires that, consistent with Mitigation Measure WC-AES-28, a shade/shadow analysis is required for any proposed buildings in the Commerce District that exceed 75 feet in height to conduct project-specific shading studies to determine whether adjacent sensitive uses could be impacted by proposed buildings.

In compliance with Mitigation Measure WC-AES-28 (as well as Section 6.1.2.2.5 of the WC2035 Plan), a shade/shadow study was conducted for the Project. In accordance with the City's CEQA Thresholds Guide, the shade/shadow impact associated with a project "would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October)." (L.A. CEQA Thresholds Guide, p. A-3-2)

The Winter Solstice, which occurs on or about December 21, is the shortest day of the year. Therefore, the longest shadows are cast on or about December 21 and are generally considered to represent the worst-case scenario. As shown in **Figure B-1**, *Winter Solstice – December 21*, there are a few offsite areas that would be shaded for more than the three-hour threshold. Specifically, the Project would shade a portion of the California Highway Patrol building and related parking surface parking lot to the north of the Project Site, as well as adjacent surface parking lots to the west. In addition, a portion of De Soto Avenue to the east of the Project Site would be shaded. However, these uses are not considered shade sensitive would not be negatively impacted by shading.

Shadows cast on the Summer Solstice are evaluated because this represents the longest day of the year, while the Spring and Fall Equinoxes represent intermediate conditions (L.A. CEQA Thresholds Guide, p. A-3-2). As shown in **Figure B-2**, *Summer Solstice – June 21*, the Project would not cast any shadows in excess of the four-hour threshold. As shown in **Figure B-3**, *Spring Equinox – March 21*, and **Figure B-4**, *Fall Equinox – September 21*, the Project would cast shadows in excess of the four-hour threshold onto portions of the surface parking lots to the north of the Project Site. However, these are not shade-sensitive uses. The only shade-sensitive uses in the vicinity of the Project Site are the residential uses across De Soto Avenue to the east and the outdoor play area of Tutor Time day care center to the north, and the Project would not cast any shadows on those uses in excess of four hours.

Therefore, based on the foregoing shadow analysis, the Project would have a less than significant impact with respect to shade and shadows.

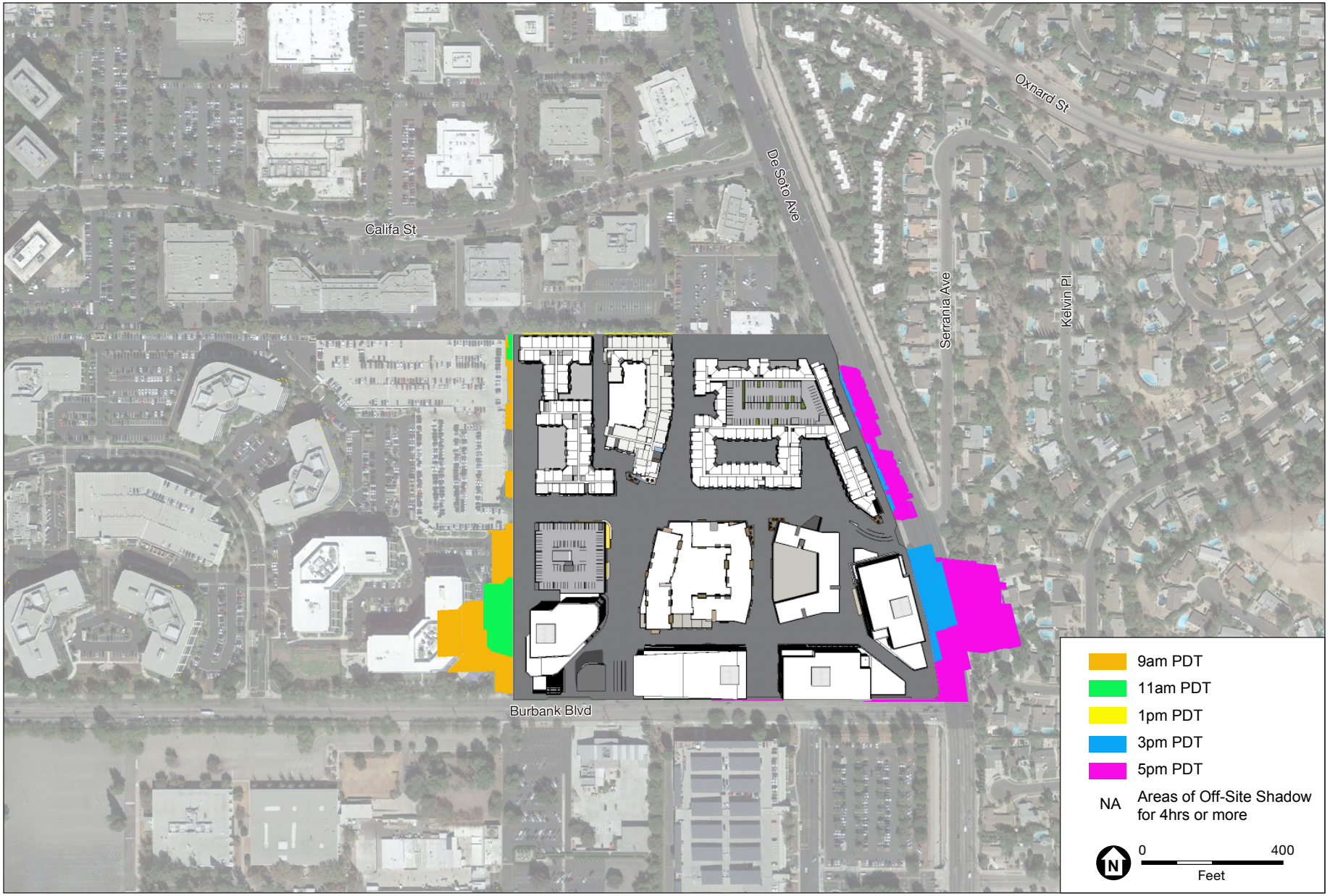


SOURCE: ESA, 2017; Basemap Google Earth, 2017

De Soto / Burbank Master Plan Project

Figure B-1
Winter Solstice Shadows - December 21

ESA

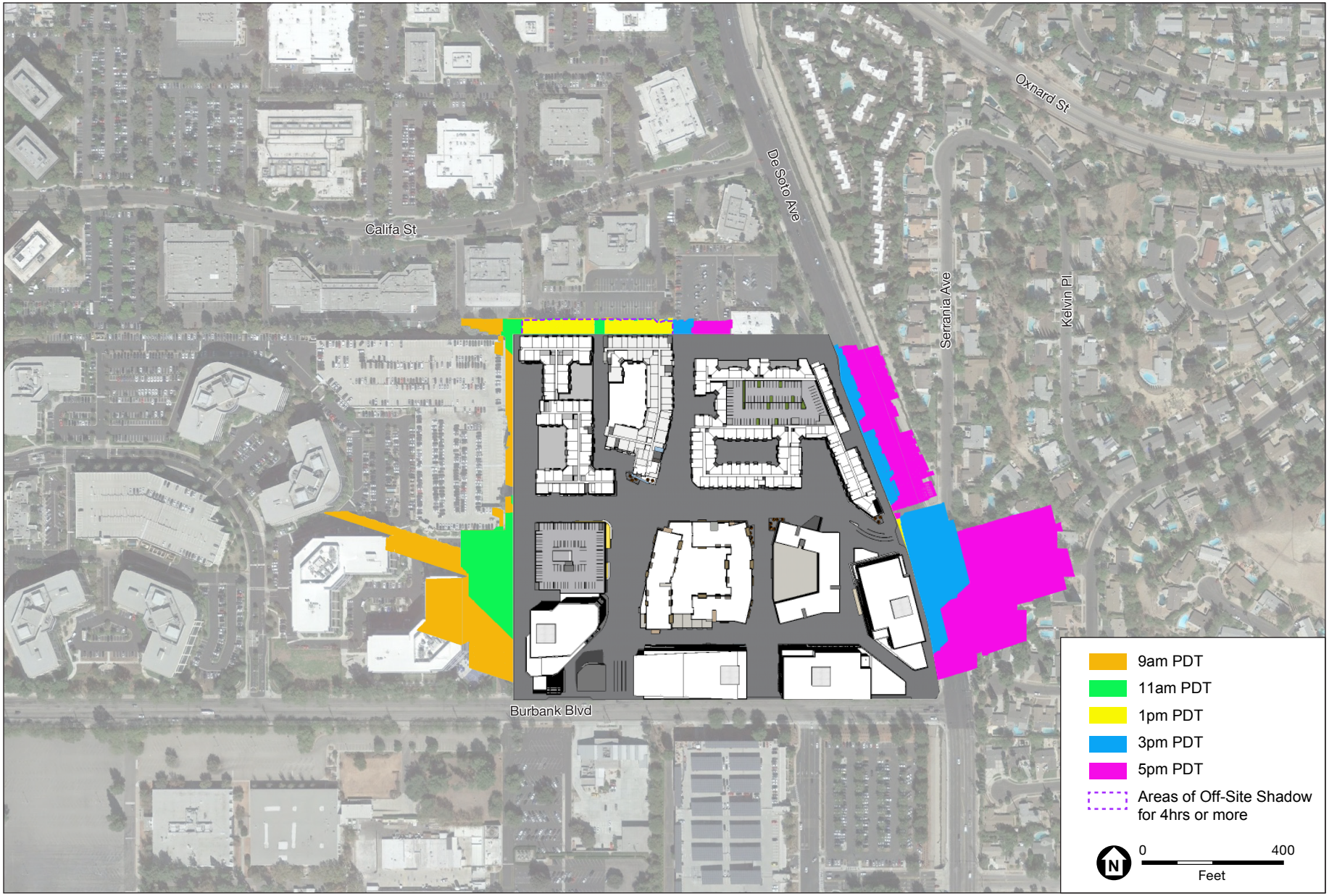


SOURCE: ESA, 2017; Basemap Google Earth, 2017

De Soto / Burbank Master Plan Project

Figure B-2
Summer Solstice Shadows - June 21

ESA

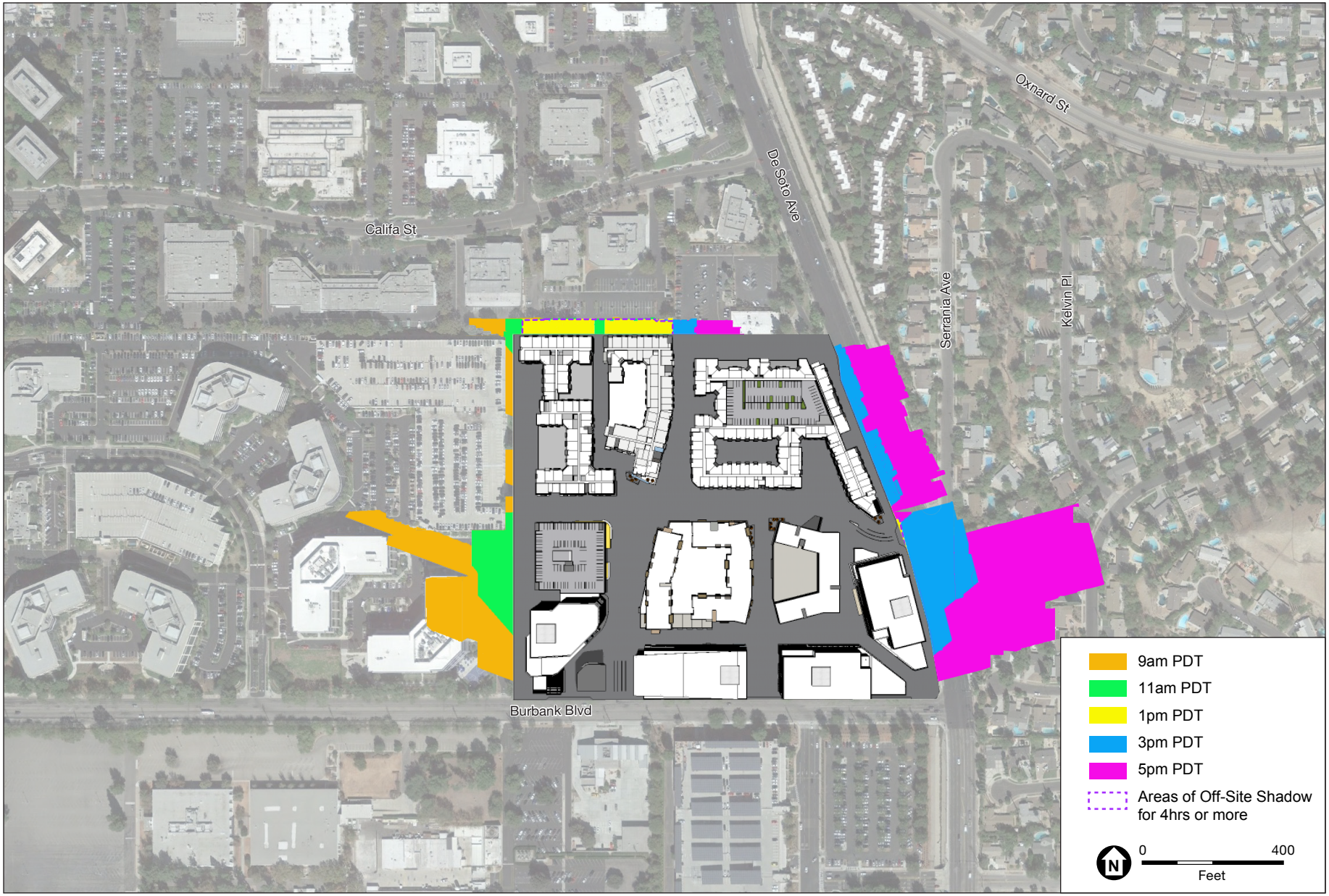


SOURCE: ESA, 2017; Basemap Google Earth, 2017

De Soto / Burbank Master Plan Project

Figure B-3
Spring Equinox Shadows - March 21

ESA



SOURCE: ESA, 2017; Basemap Google Earth, 2017

De Soto / Burbank Master Plan Project

Figure B-4

Fall Equinox Shadows - September 21

ESA

(d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

Less Than Significant Impact with Mitigation Incorporated. The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) concluded that WC2035 Plan implementation could result in increased lighting and illumination of the WC2035 Plan area as a result of the approximately 150 percent increase in density. It stated that such potential impacts were anticipated to result from the proximity of more intensively developed parcels to existing residential uses, especially where rooftops and "back of house" facilities could be visible from an offsite vantage, the introduction of new parking structures and associated vehicular (mobile) sources of glare, and the use of building materials including glass that could generate daytime glare. (WC2035 Plan DEIR, pp. 4.1-19-20)

The WC2035 Plan FEIR then discussed the various ways in which the urban design standards and guidelines in the WC2035 Plan would reduce the light and glare associated with development projects. These include lighting requirements related to security lighting, signage and parking garages. The lighting requirements are aimed to minimize light and glare impacts to adjacent uses as well as to highlight architectural features and to promote public safety. (WC2035 Plan DEIR, p. 4.1-19)

The urban design standards and guidelines also specify that interior garage lighting should not produce glaring sources of light that could impact adjacent residential units, while providing safe and adequate lighting levels. Exterior lighting (building and landscape) should be integrated with the building design and promote public safety. Architectural lighting should be visible to pedestrians and should accentuate major architectural features. Landscape lighting should be of a character and scale that would be visible to pedestrians and would highlight landscape features. Exterior lighting should be shielded to reduce glare and eliminate light being cast into the night sky. Security lighting should be integrated into the architectural and landscape lighting system. (WC2035 Plan DEIR, p. 4.1-20)

The WC2035 Plan FEIR concluded that, with the implementation of the urban design standards and guidelines and adherence to recommended Mitigation Measures WC-AES-9 through WC-AES-27 (to the extent applicable to a specific development project), the WC2035 Plan would have a less-than-significant impact with regard to light and glare. (WC2035 Plan DEIR, p. 4.1-20)

This analysis applies fully to the Project and Project Site. The lighting program for the Project would be designed to ensure a safe, secure environment for residents, office building employees, hotel patrons, and other guests and visitors. Site lighting for points of entry into the Project Site, wayfinding, pedestrian walkways, and outdoor common open space would include building-mounted and pole-mounted lighting and would be focused downward and shielded to reduce glare and skyglow. Building lighting would include façade lighting, as well as illumination of covered outdoor areas and balconies, and would likewise be focused downward or inward, as appropriate, and shielded to reduce glare and skyglow and prevent light spillover.

The Project does not include any digital or animated signs. In any event, such signage is not permitted in the Commerce District under the WC2035 Plan. Project lighting and signage would also comply with WC2035 Plan Sign District requirements and applicable LAMC and dark sky requirements.

Moreover, as previously discussed, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan EIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact on light and glare.

Therefore, with adherence to the applicable urban design standards and guidelines in the WC2035 Plan and compliance with Mitigation Measures WC-AES-9 through WC-AES-17 and WC-AES-27, the Project's impact on light and glare would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following mitigation measures from the WC2035 Plan FEIR are recommended for the Project to mitigate potentially significant impacts or further reduce less than significant impacts related to aesthetics (these mitigation measures have been non-substantively modified to apply specifically to the Project):

AES-1: All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the decision maker.

AES-2: Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.

AES-3: The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a public street or alley, pursuant to LAMC Section 91.8104.15.

AES-4: Multiple temporary signs in the store windows and along the building walls are not permitted.

AES-7: All signs shall meet the following criteria:

a) The building and ground area around signs shall be properly maintained at all times. All unused mounting structures, hardware and wall perforations from any previous sign shall be removed and building surfaces shall be restored to their original condition.

b) All signage copy shall be properly maintained and kept free from damaged sign material and other unsightly conditions, including graffiti.

c) Any sign structure shall be at all times kept in good repair and maintained in a safe and sound condition and in conformance with all applicable codes.

d) Razor wire, barbed wire, concertina wire or other barriers preventing unauthorized access to any sign, if any, shall be hidden from public view.

e) The signage copy must be repaired or replaced immediately upon tearing, ripping, or peeling or when marred or damaged by graffiti.

f) No access platform, ladder, or other service appurtenance, visible from the sidewalk, street or public right-of-way, shall be installed or attached to any sign structure.

g) Existing signs that are no longer serving the current tenants, including support structures, shall be removed and the building facades originally covered by the signs shall be repaired/resurfaced with materials and colors that are compatible with the facades.

AES-8: The material, construction, mounting, and adhesive methods of all proposed signage shall be subject to the approval of the Fire Department and the Department of Building and Safety.

AES-9: All lighting related to construction activities shall be shielded or directed to restrict any direct illumination onto property located outside of the construction area boundaries that is improved with light-sensitive uses.

AES-10: Exterior lighting shall incorporate fixtures and light sources that focus light onto project sites to minimize light trespass.

AES-11: Lighting of individual phases of the Project shall comply with LAMC Section 93.0117. As such, lighting shall not cause more than two footcandles of lighting intensity or direct glare from the light source at any residential property.

AES-12: All buildings, parking structures, and signage shall be prohibited from the using highly reflective building materials such as mirrored glass in exterior façades. Examples of commonly used non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass, and would likely include additional materials as technology advances in the future.

AES-13: Buildings shall not include large areas of reflective surfaces that could reflect light from signage into surrounding areas. No high brightness special effects lighting with brightness levels that shall exceed the lighting levels of permitted signage would be allowed. Buildings, signage or thematic elements shall not incorporate reflective building materials or

provide a source of auto headlight-related glare in proximity to glare sensitive uses.

AES-14: Outdoor lighting shall be designed and installed with shielding, so that the light source cannot be seen from adjacent residential uses.

AES-15: The exteriors of buildings shall be constructed of materials such as high performance tinted non-reflective glass and/or pre-cast concrete or fabricated wall surfaces.

AES-16: Prior to issuance of a building permit for signage displays for each phase of the Project, a lighting design expert shall develop plans and specifications for the proposed lighting displays, to identify maximum luminance levels for the displays. The City and lighting expert shall review and monitor the installation and testing of the displays, in order to insure compliance with all City lighting regulations and these mitigation measures.

AES-17: The Applicant (and successor) and/or its lighting design expert shall implement the following protocol to determine compliance with all City lighting regulations and these mitigation measures no later than 6 months after certificate of occupancy:

a) A representative testing site shall be established on or next to those light sensitive receptors that have the greatest exposure to signage lighting on each facades of a development.

b) A light meter mounted to a tripod at eye level, facing project buildings, should be calibrated and measurements should be taken to determine ambient light levels with the sign on.

c) An opaque object (a board) should be used to block out the view of the sign from the light meter, at a distance of at least 4 feet away from the tripod and blocking the light meter's view of the building. A reading should be taken to determine the ambient light levels with the sign off.

d) The difference between the two would be the amount of light the sign casts onto the sensitive receptor.

e) An alternate acceptable method to measure light levels would be to use the same tripod and same light meter, but to turn on and off the signage. This method takes more coordination, but is more accurate.

AES-27 The Applicant (or successors as appropriate) shall submit a conceptual signage and lighting design plan to the Department of City Planning to establish lighting standards and guidelines.

2. Agricultural and Forestry Resources

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) stated that, in compliance with Section 15128 of the State CEQA Guidelines, the impacts of the contemplated development in the WC2035 Plan area (which includes the Project Site) on agricultural and forestry resources had previously been determined to be less than significant and therefore was not analyzed in the WC2035 Plan FEIR. It stated that (a) the WC2035 Plan area is developed and zoned for urban uses and is not currently used for agricultural purposes, (b) the implementation of the WC2035 Plan would not result in the conversion of farmland, (c) no loss of farmland would result and (d) there are no Williamson Act contracts within the WC2035 Plan area (WC2035 Plan DEIR, p. 5-6).

No Further Project Analysis Required

Based on the analysis in the WC2035 Plan FEIR, an evaluation of the Project's potential impacts on agricultural and forestry resources is not required in this Tiered IS because the WC2035 Plan FEIR has already determined that no development within the WC2035 Plan area, including development of the Project Site, would have a significant impact on agricultural and forestry resources.

3. Air Quality

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) evaluated potential impacts to air quality resulting from development in the WC2035 Plan area (which includes the Project Site).

Air Quality Management Plan

The WC2035 Plan FEIR stated that, generally, if a project is consistent with the assumptions regarding population, housing, and growth trends utilized by the South Coast Air Quality Management District (SCAQMD) to develop its 2007 Air Quality Management Plan (2007 AQMP), the project would not conflict with implementation of the applicable plan. The 2007 AQMP was developed using population and vehicle miles traveled (VMT) projections developed by the Southern California Association of Governments (SCAG). (WC2035 Plan DEIR, p. 4.2-30)

The WC2035 Plan FEIR also stated that implementation of the WC2035 Plan would result in a population increase in the WC2035 Plan area that would exceed the population growth projections for the Warner Center area in the 2007 AQMP. It noted, however, that the overall 2035 population of the City of Los Angeles was anticipated to remain consistent with SCAG forecasts, resulting in a redistribution of populations rather than an increase. It also noted that buildout under the WC2035 Plan would increase density in an urban area that was well served by transit consistent with SCAG policies, and therefore the WC2035 Plan should be incorporated into SCAG's future projections (for the 2012 RTP), which would result in an impact that was less than significant. Nonetheless, the WC2035 Plan FEIR identified this impact as potentially significant because of the inconsistency

with the adopted 2007 AQMP numbers for the immediate WC2035 Plan area, although not for the City as a whole. (WC2035 Plan DEIR, pp. 4.2-30-31)

However, the WC2035 Plan FEIR presented another measurement tool to determine consistency with the 2007 AQMP that analyzed how a project accommodates the expected increase in population or employment. It stated that, generally, if a project is designed to minimize VMT, that aspect of the project would be consistent with the 2007 AQMP. Implementation of the WC2035 Plan would use a strategy for targeted growth to reduce regional traffic by locating jobs and residences in close proximity and locating both jobs and residents close to transit. The WC2035 Plan FEIR anticipated that VMT on local streets would increase due to increased concentration of development anticipated in the WC2035 Plan Area and that regional VMT would decrease with implementation of the WC2035 Plan as compared to the no project condition in 2035. Therefore, it determined that implementation of the WC2035 Plan would result in long-term air quality improvement consistent with the 2007 AQMP. (WC2035 Plan DEIR, p. 4.2-31)

Based on this overall discussion, the WC2035 Plan FEIR determined that this impact would be less than significant and did not recommend any mitigation. (WC2035 Plan DEIR, p. ES-9)

Construction Criteria Pollutant Emissions

Implementation of the WC2035 Plan would increase development in the WC2035 Plan area to approximately 30.12 million square feet of non-residential space, plus 32.56 million square feet of residential area (26,048 units). This represents an approximate increase of 14.06 million square feet of non-residential space and 23.43 million square feet of residential area (19,848 units), as compared to the existing condition when the WC2035 Plan FEIR was prepared. (WC2035 Plan DEIR, pp. 4.2-31-32)

Construction activities associated with such development would result in criteria pollutant emissions, including fugitive dust associated with ground disturbance during grading and exhaust emissions from construction equipment as well as worker and delivery vehicles traveling to and from each construction site within the WC2035 Plan area. (WC 2035 Plan DEIR, p. 4.2-32)

As discussed in the WC2035 Plan FEIR, without project specific information on the proposed uses, locations and construction schedules, construction emissions for individual projects could not be quantified. Nonetheless, it determined that there was sufficient data available to generally approximate the types of construction that might occur (e.g., residential and non-residential) and associated square footage. As such, it provided an estimate of average annual construction related emissions assuming total emissions were spread equally over the planning horizon of the WC2035 Plan. The estimate assumed an average of two simultaneous projects per year. The WC2035 Plan FEIR acknowledged that substantially more construction could occur during peak years (potentially five times or more than what was assumed), resulting in exceedances of the SCAQMD's recommended thresholds for reactive organic gases (ROG), carbon monoxide (CO), nitrogen oxides (NO_X) and particulate matter (PM_{10} and $PM_{2.5}$). It concluded that, with the implementation of Mitigation Measures WC-AQ-1 through WC-AQ-9 (as discussed further below), emissions of some regional criteria pollutants would likely be substantially reduced by implementing measures

such as reducing fugitive dust, maintaining and monitoring indoor air quality at nearby schools, providing rideshare incentives for construction workers, amongst others. (WC2035 Plan DEIR, pp. 4.2-39-42, WC2035 Plan FEIR, pp. V-5-11) However, notwithstanding those mitigation measures, buildout under the WC2035 Plan would result in significant and unavoidable impacts with regard to construction emissions. (WC2035 Plan DEIR, pp. 4.2-32-33)

The WC2035 Plan FEIR also anticipated that localized significance thresholds could be exceeded in the vicinity of some construction sites. It stated that localized construction emissions would potentially exceed the PM_{10} and $PM_{2.5}$ thresholds. Implementation of the mitigation measures with respect to construction air quality specified in the WC2035 Plan FEIR would reduce localized emission impacts to Los Angeles Unified School District (LAUSD) schools within the WC2035 Plan area, including Woodland Hills Academy Middle School to less than significant levels. However, because specific construction activity under the WC2035 Plan could not be determined at the time the WC2035 Plan FEIR was prepared, localized construction emission impacts on other sensitive receptors (e.g., residential uses, hospital) were considered to be significant and unavoidable. (WC2035 Plan DEIR, pp. 4.2-35-36, 43)

Operational Criteria Pollutant Emissions

The WC2035 Plan FEIR found that implementation of the WC2035 Plan would decrease emission of VOC, CO, NO_X and sulfur oxide (SO_X) emissions due to statewide regulations to control emissions of these criteria pollutants. However, buildout under the WC2035 Plan would result in potentially significant long-term operational impacts from PM_{10} and $PM_{2.5}$ emissions due to increased vehicular traffic and associated emissions. These operational air quality impacts with respect to PM_{10} and $PM_{2.5}$ emissions would be significant and unavoidable. (WC2035 Plan DEIR, pp. 4.2-33-34, 43)

Carbon Monoxide Concentrations at Local Intersections

Traffic generated as the result of buildout under the WC2035 Plan would result in the formation of CO hotspots at local roadway intersections. As discussed in the WC2035 Plan FEIR, State requirements for cleaner vehicles, equipment, and fuels have cut peak CO levels in half since 1980 despite growth. Implementation of the WC2035 Plan would not increase CO concentrations significantly at any intersection because the increase in trips would be significantly offset by the decrease in emission rates with the increased use of cleaner vehicles, equipment, and fuels. Therefore, the WC2035 Plan FEIR concluded that further analysis was not necessary. (WC2035 Plan DEIR, p. 4.2-35)

Toxic Air Contaminants

With respect to toxic air contaminants (TACs), the land uses analyzed in the WC2035 Plan FEIR do not include substantial sources of long-term TAC emissions, such as distribution centers, rail yards, ports, refineries, chrome platers, dry cleaners, and gasoline dispensing facilities. The WC2035 Plan FEIR identified potential impacts to future receptors sited within the WC2035 Plan area from exposure to TAC emissions generated from vehicles traveling on the US-101 Ventura Freeway. Since certain portions of the WC2035 Plan area are located adjacent to the US-101

Ventura Freeway, Mitigation Measure WC-AQ-16 requires the installation and maintenance of air filtration systems for occupied areas of buildings (excluding storage/warehouse areas or garages) within 500 feet of a freeway for commercial and industrial uses and residential uses that front on a major highway or are located adjacent to an active heavy rail line having efficiency equal to or exceeding American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Standard 52.2 minimum efficiency reporting value (MERV) 13 (excluding storage/warehouse areas or garages) to reduce potential health risks from exposure to airborne toxic air contaminants from the US-101 Ventura Freeway. (WC2035 Plan DEIR, p. 4.2-36) Since the WC2035 Plan FEIR was prepared, the City has adopted more stringent requirements requiring filtration media of MERV 13 for regularly occupied areas of nonresidential uses within 1,000 feet of a freeway per LAMC Section 99.05.504.5.3 and for regularly occupied areas of residential uses within 1,000 feet of a freeway per LAMC Section 99.04.504.6.

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended 22 mitigation measures, designated as WC-AQ-1 through WC-AQ-22, with respect to potentially significant and less than significant impacts related to air quality. (WC2035 Plan FEIR pp. V-5-11) Some of the mitigation measures in the WC2035 Plan FEIR are not applicable to the Project are not included below. These include Mitigation Measures WC-AQ-14 and WC-AQ-15, which only apply to projects with potentially significant air quality impacts on LAUSD schools and, as demonstrated below in Section 3(d), the Project would not result in potentially significant air quality impacts on any LAUSD school; WC-AQ-16, which only applies to projects located within 500 feet of the US-101 Ventura Freeway or other high-volume routes and major transportation corridors, rail yards and lines, distribution centers, industrial operations, or other substantial sources of TACs; and WC-AQ-17 through WC-AQ-21, which are stated obligations of the City, not a private developer, and/or are related to goods movement and streetlights in the WC2035 Plan area. The following mitigation measures are applicable to the Project:

WC-AQ-1: The City shall require that all projects use soil binders on soils exposed for extended periods of time (more than two weeks) to reduce fugitive dust. In addition, the City shall require that projects be required to include the following measures as applicable and feasible:

1) Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.

2) Provide dedicated turn lanes for movement of construction trucks and equipment, on-and off-site.

3) Reroute construction trucks away from congested streets or sensitive receptor areas.

4) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM_{10} generation.

5) Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

6) Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113.

7) Construct or build with materials that do not require painting.

8) Require the use of pre-painted construction materials.

9) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export).

10) During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher, according to the following.

- Project Start, to December 31, 2011: All off road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off road emissions standards. In addition, all construction equipment shall be outfitted with the BACT 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 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- January 1, 2012, to December 31, 2014: All off road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off road emissions standards. In addition, all construction equipment shall be outfitted with BACT 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.

- Post-January l, 2015: All off road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT 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.

- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall

be provided at the time of mobilization of each applicable unit of equipment.

- Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate cleanup of off-road diesel vehicles, such as heavy-duty construction equipment. More information on this program can be found at the following website:
  http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines.

11) Other measures as applicable on a project by project basis and as may be recommended by SCAQMD on their web site or elsewhere: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies.

WC-AQ-2: The City shall require that ground cover be reestablished on construction sites through seeding and watering on completion of construction (or is sites are to remain undeveloped for more than a year).

WC-AQ-3: The City shall require that trucks leaving construction sites be washed to reduce track-out dirt and dust.

WC-AQ-4: The City shall require that developers provide rideshare and transit incentives to construction personnel.

WC-AQ-5: The City shall require that developers configure construction parking to minimize interference with traffic lanes.

WC-AQ-6: The City shall require that developers and City Departments minimize the obstruction of through-traffic in the vicinity of construction sites.

WC-AQ-7: The City shall require that developers and City Departments use flag people during construction to guide traffic properly.

WC-AQ-8: The City shall require that construction activities that could affect roadways be scheduled for off-peak periods.

WC-AQ-9: The City shall require that developers (as well as City construction personnel associated with construction of roadway and other infrastructure) ensure that that construction vehicles avoid, to the extent feasible, travel on streets immediately adjacent to Canoga Park High School, Woodland Hills Academy Middle School and Hart Elementary School throughout the construction phase of each project to reduce potentially significant project specific and cumulative construction-related air quality impacts. The City shall ensure that haul routes are designed to comply with this measure.

WC-AQ-10: The City shall require that projects located within 0.5 miles of any LAUSD school shall be subject to a construction fee that provides for funding for the replacement of air filters at the beginning and at the conclusion of construction in any air conditioning units at the affected school site.

WC-AQ-11: The City shall ensure that projects located within 0.5 miles of any LAUSD school shall provide advance notification of the project's anticipated general construction schedule and a specific schedule for site grading and preparation activities, and shall allow the affected school 15 days to review and comment on the schedule. In addition, any such project shall be required to provide personnel on a daily basis to wash the playground, lunch areas, and seating areas at the affected school site during active grading and earth moving phases of the construction, as coordinated with the appropriate school administrative staff.

WC-AQ-12: The City shall ensure that projects located within 0.5 miles of any LAUSD school shall, as a condition of the Project Permit Compliance Review, execute a covenant to implement feasible mitigation measures, including all measures identified above.

WC-AQ-13: The City shall ensure that projects located within 0.5 miles of any LAUSD school shall, contribute a fair share to the Warner Center Air Quality Trust Fund by paying the Construction Air Quality Impact Assessment (CAQIA) fee prior to the issuance of any building, demolition, grading or foundation permit. The CAQIA Fee shall be $0.10 per square foot of proposed surface area disturbed or greater as may be identified in a subsequent fair share study.

WC-AQ-22: All landscaping in public and private projects shall be required to be drought tolerant to reduce water consumption and provide passive solar benefits.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts related to air quality, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which are set forth in the WC2035 Plan FEIR, are discussed below.

Would the project:

(a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The WC2035 Plan FEIR stated that, generally, if a project is consistent with the assumptions regarding population, housing, and growth trends utilized by the South Coast Air Quality Management District (SCAQMD) to develop its 2007 Air Quality Management Plan (2007 AQMP), the project would not conflict with implementation of the applicable plan. The 2007 AQMP was developed using population and vehicle miles traveled

(VMT) projections developed by the Southern California Association of Governments (SCAG). (WC2035 Plan DEIR, p. 4.2-30)

The WC2035 Plan FEIR also stated that implementation of the WC2035 Plan would result in a population increase in the WC2035 Plan area that would exceed the population growth projections for the Warner Center area in the 2007 AQMP. It noted, however, that the overall 2035 population of the City of Los Angeles was anticipated to remain consistent with SCAG forecasts, resulting in a redistribution of populations rather than an increase. It also noted that buildout under the WC2035 Plan would increase density in an urban area that is well served by transit consistent with SCAG policies, and therefore the WC2035 Plan should be incorporated into SCAG's future projections (for the 2012 RTP), which would result in an impact that is less than significant. Nonetheless, the WC2035 Plan FEIR identified this impact as potentially significant because of the inconsistency with the adopted 2007 AQMP numbers for the immediate WC2035 Plan area, although not for the City as a whole. (WC2035 Plan DEIR, pp. 4.2-30-31)

However, the WC2035 Plan FEIR presented another measurement tool to determine consistency with the 2007 AQMP that analyzed how a project accommodates the expected increase in population or employment. It stated that, generally, if a project is designed to minimize VMT, that aspect of the project would be consistent with the 2007 AQMP. Implementation of the WC2035 Plan would use a strategy for targeted growth to reduce regional traffic by locating jobs and residences in close proximity and locating both jobs and residents close to transit. The WC2035 Plan FEIR anticipated that regional VMT would decrease with implementation of the WC2035 Plan as compared to the no project condition in 2035. Therefore, it determined that implementation of the WC2035 Plan would result in long-term air quality improvement consistent with the 2007 AQMP. (WC2035 Plan DEIR, p. 4.2-31)

Based on this overall discussion, the WC2035 Plan FEIR determined that this impact would be less than significant and did not recommend any mitigation. (WC2035 Plan DEIR, p. ES-9)

This analysis is fully applicable to the Project. As discussed above, the WC2035 Plan FEIR stated that the implementation of the WC2035 Plan could be viewed as inconsistent with the 2007AQMP because the project population growth under the Plan substantially exceeded the projected population growth under the AQMP. Consistent with that determination, the Project would contribute a portion of the increased population growth in the Plan area, and would therefore be inconsistent with the growth projection for the Project Site in the WC2035 Plan.

However, the WC2035 Plan FEIR ultimately determined that the implementation of the WC2035 Plan would result in long-term air quality improvement, consistent with the AQMP. Here, consistent with the analysis in the WC2035 Plan FEIR, the Project would minimize VMT. The Metro Shuttle Line 601 is the recently implemented Warner Center Shuttle, which now provides two stops located adjacent to and on the Project Site – one stop is located at the northwest intersection of Burbank Boulevard and De Soto Avenue and the other stop to the west of that along Warner Center Lane, just north of Burbank Boulevard – and runs through the Project Site along Warner Center Lane. The Warner Center Shuttle provides direct connection to and from the Metro Orange Line Canoga Station and throughout Warner Center, including direct connection to the

Warner Center Towers, Warner Center Corporate Park, and Westfield Topanga, the Village and the Promenade. The Warner Center Shuttle also stops at the Warner Center Transit Hub at the intersection of Oxnard Street and Owensmouth Avenue. Additionally, there are two bus stops located immediately adjacent to the Project Site, one on De Soto Avenue (Los Angeles County Metro Line 244 and Santa Clarita Transit Commuter Express Line 796) and the other on Burbank Boulevard (Ventura County Transportation Commission Highway 101/Conejo Connection and Antelope Valley Transit Authority Line 787). Therefore, the Project would locate both jobs and residents close to transit and would support the WC2035 Plan strategy of reducing regional VMT and associated emissions. As the WC2035 Plan FEIR concluded, this is consistent with the AQMP.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1. This results in a further reduction of VMT in comparison to the VMT assumed for the redevelopment of the Project Site in the WC2035 Plan FEIR.

For these reasons, while the Project would exceed the population growth projections in the 2007 AQMP, given that the Project would be consistent with the level of development contemplated in the WC2035 Plan FEIR and that the Project has been designed to minimize VMT and would be consistent with the WC2035 Plan strategy of locating both jobs and residents close to transit to reduce regional VMT and associated emissions, the Project would not conflict with or obstruct implementation of the AQMP. Therefore, this impact would be less than significant, consistent with the WC2035 Plan FEIR, and was adequately addressed in the WC2035 Plan FEIR.

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

Construction

Regional Construction Impacts

Less Than Significant Impact with Mitigation Incorporated. The WC2035 Plan FEIR concluded that, with the implementation of Mitigation Measures WC-AQ-1 through WC-AQ-9, emissions of some regional criteria pollutants would likely be substantially reduced by implementing measures such as reducing fugitive dust, maintaining and monitoring indoor air quality at nearby schools, providing rideshare incentives for construction workers, amongst others. The WC2035 Plan FEIR concluded that construction activities from two concurrent projects in the WC2035 Plan area could result in exceedances of the daily VOC, CO, NO_X, PM_{10} and $PM_{2.5}$ regional emissions thresholds. (WC2035 Plan DEIR, pp. 4.2-31-33, 39-42)

As discussed above, construction emissions for individual projects could not be quantified at the time the WC2035 Plan FEIR was prepared. Information that was previously unknown at the time the WC2035 Plan FEIR was certified is now available to conduct a project-specific construction emissions analysis. Project construction activities would require the temporary use of construction equipment at the Project Site, including loaders, dozers, forklifts, excavators, haul trucks and

worker vehicle fuels. The use of this equipment during the construction of each phase of the Project would generate emissions from equipment exhaust and fugitive dust.

Maximum daily regional construction emissions for the Project were estimated using the California Emissions Estimator Model (CalEEMod) (version 2016.3.2) software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The CalEEMod emissions modeling analysis includes fugitive dust control measures, based on compliance with SCAQMD Rule 403. In addition, the emissions modeling analysis incorporates the quantifiable Mitigation Measures in the WC2035 Plan FEIR (i.e., WC-AQ-1 through WC-AQ-3).

The maximum daily regional construction emissions for each construction phase of the Project are presented in **Table B-1,** *Maximum Daily Regional Construction Emissions,* and are compared to the SCAQMD regional significance thresholds. With respect to each criteria pollutant, the applicable threshold is compared to the greatest emission amount for any project construction phase. Some phases of construction could potentially overlap and occur at the same time. Overlapping phases represent periods of construction for phases that could have partially or completely overlapping construction activities. In addition, the maximum daily regional construction emissions from overlapping activities within the construction phases were accounted for in the emissions analysis. Overlapping activities within the construction phases include demolition and site preparation, and building construction, paving and architectural coating. Phase 1 building construction, paving, and architectural coating activities could potentially overlap with Phase 2 demolition and site preparation activities. Therefore, maximum daily regional construction emissions from the partial overlapping of Phase 1 and 2 construction activities are presented in Table B-1, below. Similarly, the development of Phases 5 and 6 could occur concurrently. Therefore, the maximum daily regional construction emissions from the overlapping of Phase 5 and Phase 6 is also presented in Table B-1.

The construction emissions shown in Table B-1 reflect these potentially overlapping construction phases and activities and therefore represent the potential maximum daily emissions from construction of the Project. With respect to each criteria pollutant, the applicable threshold is compared to the greatest emission amount for any project phase. Consistent with recommended Mitigation Measures WC-AQ-1 through WC-AQ-3, construction of the Project would be subject to standard construction practices, such as compliance with fugitive dust control measures in SCAQMD Rule 403, and would comply with applicable federal, state, and local regulations, such as the California Air Resources Board (CARB) existing off-road diesel vehicle regulation that requires the phase-in of cleaner heavy-duty equipment.

TABLE B-1
MAXIMUM MITIGATED DAILY REGIONAL CONSTRUCTION EMISSIONS

Phase	Project Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Phase 1	13	80	53	0.2	18.0	5.5
Phase 2	12	55	63	0.3	8.7	4.4
Phase 3	29	69	56	0.4	9.8	4.3
Phase 4	18	28	36	0.2	6.0	2.3
Phase 5	23	38	31	0.2	8.4	2.8
Phase 6	22	47	32	0.2	8.4	2.8
Phase 7	29	49	43	0.3	8.7	3.1
Phase 8	31	67	59	0.4	11.1	4.4
Phase 1 + 2 Overlapping	15	26	115	0.3	15.3	6.3
Phase 5 + 6 Overlapping	45	85	63	0.4	16.7	5.6
Project Maximum	**45**	**85**	**115**	**0.4**	**18.0**	**6.3**
SCAQMD Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

[a] Overlapping construction activity includes building construction, architectural coating, and paving from Phase 1 and demolition and site preparation from Phase 2
[b] Phase 5 and 6 overlapping assumes that all construction activity during both phases would happen concurrently.

Source: ESA 2018; SCAQMD 2008

The construction emissions in Table B-1 also incorporate the reduction in emissions that would occur with the implementation of Mitigation Measures WC-AQ-1 through WC-AQ-3 (which include requirements for cleaner heavy-duty equipment and fugitive dust control measures such as reestablishing ground cover on construction sites and washing trucks leaving construction sites to reduce track-out dirt). The Project would also implement Mitigation Measures WC-AQ-4 through WC-AQ-8, which would minimize emissions associated with potential construction traffic congestion. These potential reductions are not readily quantifiable, but would likely result in further reductions in construction emissions.

As shown in Table B-1, with the implementation of Mitigation Measures AQ-1 through AQ-3, the Project's maximum daily regional construction emissions associated with any development phase would not exceed the SCAQMD regional significance thresholds for any of the criteria pollutants, including VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ (see Appendix A to this Tiered IS for detailed calculations).

Therefore, because the Project's regional construction emissions would not exceed the SCAQMD regional significance thresholds for any construction phase, the Project's impacts on regional air quality resulting from construction emissions would be less than significant.

Operations

Significant and Unavoidable Impact. The WC2035 Plan FEIR found that operational emissions of ROG, CO, NO_X, and SO_X would decrease in comparison to existing emissions. However, it anticipated an increase in operational PM_{10} and $PM_{2.5}$ emissions due to increased VMT on local roadways with buildout under the WC2035 Plan. The decrease in the majority of criteria pollutants was largely a result of reductions in vehicle emissions that were projected to occur between 2008 and 2035 due to stricter regulations and improved technology. The WC2035 Plan FEIR acknowledged that the estimated increase in PM_{10} and $PM_{2.5}$ was likely closer to an 11.6 percent increase, consistent with the projected VMT increase analyzed in Section 4.12, Transportation, Circulation and Parking of the WC2035 Plan FEIR. Furthermore, the WC2035 Plan FEIR noted that buildout under the WC2035 Plan would be expected to reduce regional VMT generated by projected growth, since growth that would occur in Warner Center rather than elsewhere in the City or region would be expected to be more efficient in terms of energy use (fewer, shorter trips than in areas without transit or other amenities designed to encourage modes of transportation other than cards, plus more efficient buildings) and would therefore result in fewer emissions of criteria pollutants.

However, for purposes of presenting a worst case analysis, it assumed the maximum daily emissions during summer months and used the standard default trip generation and trip length assumptions for each use as provided in the Urbemis air pollutant emissions model. As a result, the WC2035 Plan FEIR conservatively showed a 100 percent increase for PM_{10} and $PM_{2.5}$. Therefore, it concluded that operational PM_{10} and $PM_{2.5}$ emissions for buildout under the WC2035 Plan area would exceed the SCAQMD regional thresholds and this impact would be significant and unavoidable. (WC2035 Plan DEIR, pp. 4.2-33-34, 43)

This analysis adequately addressed the Project's air quality impacts with respect to operational emissions. The Project's mix of residential, work-live, commercial office, retail, hotel and restaurant uses are consistent with the WC2035 Plan as analyzed in the WC2035 Plan FEIR. Accordingly, the operation of the Project would generate the same criteria pollutants identified above. While the WC2035 Plan FEIR did not recommend any project-specific mitigation measures that specifically reduce operational emissions related to PM_{10} and $PM_{2.5}$, as discussed above, implementation of the WC2035 Plan (which anticipates the redevelopment of the Project Site) would be expected to reduce regional VMT generated, as it encourages transit oriented development.

It is also noted that, consistent with the WC2035 Plan FEIR, no feasible mitigation exists that could reduce operational PM_{10} and $PM_{2.5}$ emissions to a less than significant impact. The PM_{10} and $PM_{2.5}$ emissions generated by future project resident, visitor, employee and vendor trips would be comprised of road dust, tire wear dust, brake wear dust, and vehicle tailpipe exhaust emissions. These emissions types are emitted in direct proportion to VMT. The Project VMT already incorporates reduction benefits from the transportation demand management (TDM) program pursuant to Section 7.8 of the WC2035 Plan, mode choice distributions for walking, biking, and transit trip generation anticipated for the WC2035 Plan area, pass-by trips (which are trips not originally destined to the Project Site but already on the street network), and internal capture (which

are trip reductions from interaction among adjacent land uses such as residents walking to an adjacent land use), as documented in the *Preliminary Driveway Traffic Volume Review, De Soto/Burbank Master Plan Project, Warner Center, California (December 14, 2017)* prepared by Gibson Transportation Consulting and provided as Appendix K to this Tiered IS.

There are no technological measures available to reduce or eliminate road dust, tire wear dust, and brake wear dust PM_{10} and $PM_{2.5}$ from vehicles. With respect to tailpipe exhaust emissions, gasoline powered vehicles emit less PM_{10} and $PM_{2.5}$ per mile than similar diesel powered vehicles, and electric vehicles (EVs) result in lower PM_{10} and $PM_{2.5}$ emissions per mile (from power plants used to produce the electricity to charge EVs) than either gasoline or diesel.[1] In accordance with the Urban Design Guidelines in the WC2035 Plan, five percent of the parking spaces will include EV charging stations , which is expected to encourage electric vehicle usage by project residents, visitors, employees, and vendors. However, the use of lower emitting vehicles by future project residents, visitors, employees, and vendors cannot be mandated. Thus, there are no feasible economic, legal, social, or technological measures that could reduce tailpipe exhaust PM_{10} and $PM_{2.5}$ emissions to a less-than-significant, consistent with the analysis and conclusion in the WC2035 Plan FEIR.

Moreover, the density of the Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced operational air quality impact as compared to the impact assumed in the WC2035 Plan FEIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's operational air quality impact.

In addition, the WC2035 Plan FEIR analysis assumed a worst case scenario for operational emissions and assessed the air quality impacts associated with full buildout under the WC2035 Plan area. By contrast, the Project would have a minimal contribution to the overall significant impact on operational emissions for PM_{10} and $PM_{2.5}$.

Relatedly, the geographic distribution of the emissions and meteorological effects would disperse the regional emissions such that clearly predictable and identifiable heath impacts would not likely result from the Project's emissions. As discussed in the WC2035 Plan FEIR, health effects associated with particulate matter include damage to the lung or respiratory tract, increase in the number and severity of asthma attacks, causing or aggravating bronchitis and other lung diseases, and reducing the body's ability to fight infection (WC2035 Plan DEIR, p. 4.2-3). The estimated PM_{10} and $PM_{2.5}$ emissions in the WC2035 Plan FEIR, including such emissions associate with the Project, are proportional to VMT (WC2035 Plan DEIR, p. 4.2-34). Since the PM_{10} and $PM_{2.5}$ emissions are a function of VMT, they would be distributed over the regional roadway and freeway network. These regional emissions would be widely dispersed due to the geographic distribution of vehicles as they travel on roadways and freeways throughout the South Coast Air Basin from

[1] U.S. Department of Energy, Alternative Fuels Data Center, Emissions from Hybrid and Plug-In Electric Vehicles, https://www.afdc.energy.gov/vehicles/electric_emissions.php, accessed June 2018.

the Project Site for various purposes (home to work commute, shopping, entertainment, recreation, errands, etc.). Therefore, the Project's potential contribution to ambient pollutant concentrations at any one location would likely be a very small fraction of the existing levels. Meteorological factors, such as wind, would result in additional dispersive effects as pollutants are dispersed horizontally downwind and through vertical mixing. Accordingly, it is unlikely that the Project's regional PM_{10} and $PM_{2.5}$ emissions would result in clearly predictable and identifiable heath impacts specifically as result of operation of the Project.

Finally, a second-tier CEQA document is not required to re-analyze a significant impact that is not susceptible to being mitigated to a level of insignificance. Cal. Pub. Res. Code §21068.5; State CEQA Guidelines §15152(f). The WC2035 Plan FEIR concluded that cumulative buildout under the WC2035 Plan would have a significant air quality impact with respect to operational emissions for PM_{10} and $PM_{2.5}$, and that this significant impact could not be mitigated and was therefore unavoidable. Accordingly, while the Project's incremental contribution to the significant air quality impact identified in the WC2035 Plan FEIR would be less than significant, the overall impact from buildout under the WC2035 Plan would be significant and unavoidable, but was adequately addressed in the WC2035 Plan FEIR.

(c) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM_{10}, and $PM_{2.5}$) under an applicable federal or state ambient air quality standard?

Cumulative Construction

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. The South Coast Air Basin is currently in federal or state non-attainment for ozone, PM_{10}, and $PM_{2.5}$. As discussed in the WC2035 Plan FEIR, the WC2035 Plan would be consistent with anticipated growth for the City as a whole and therefore would be consistent with air quality projections for the region. Nonetheless, it determined that the WC2035 Plan would significantly contribute to cumulative increases in emissions of criteria pollutants in the region during both operation and construction. (WC2035 Plan DEIR, pp. 4.2-31-33, 39)

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. For this reason, SCAQMD uses the same significance thresholds for criteria pollutants to assess project-specific and cumulative air quality impacts. Specifically, the SCAQMD CEQA Air Quality Handbook states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District."[2] The SCAQMD has also provided guidance on

[2] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, p. 6-1.

an acceptable approach to addressing the cumulative impacts issue for air quality as discussed below:[3]

> *"As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

Because the City has not adopted specific Citywide significance thresholds for air quality impacts, it is appropriate to rely on thresholds established by the SCAQMD (refer to CEQA Guidelines Section 15064.7).

Conversely, projects that do not exceed the SCAQMD's project-specific significance thresholds are not considered to be cumulatively significant. Therefore, because the Project does not exceed any of the air quality thresholds of significance for both regional and localized construction emissions, as discussed above in Section 3(b), the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM_{10}, and $PM_{2.5}$) under any applicable federal or state ambient air quality standard, and this impact is less than significant.

Cumulative Operations

Significant and Unavoidable Impact. As discussed in the WC2035 Plan FEIR, the WC2035 Plan would be consistent with anticipated growth for the City as a whole and therefore would be consistent with air quality projections for the region. Nonetheless, it determined that the WC2035 Plan would significantly contribute to cumulative increases in emissions of criteria pollutants in the region during both operation and construction. (WC2035 Plan DEIR, pp. 4.2-33-34, 39)

This analysis adequately addressed the Project's cumulative operational air quality impacts. As discussed in the preceding section, projects that exceed the SCAQMD's project-specific significance thresholds with respect to operational emissions are considered by the SCAQMD to be cumulatively considerable. As previously discussed in Section 3(b), the WC2035 Plan FEIR determined that potential impacts for operational emissions of PM_{10} and $PM_{2.5}$ were significant and unavoidable (WC2035 Plan DEIR, pp. 4.2-33-34, 43). As stated above, the South Coast Air Basin is currently in federal or state non-attainment for ozone, PM_{10}, and $PM_{2.5}$.

As also discussed in Section 3(b), the Project would be consistent with the permitted uses and density under the WC2035 Plan as analyzed in the WC2035 Plan FEIR and would result in a minimal contribution to the overall significant impact identified in the WC2035 Plan FEIR. In any event, a second-tier CEQA document is not required to re-analyze a significant impact that is not

[3] South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4, accessed May 2018.

susceptible to being mitigated to a level of insignificance. Cal. Pub. Res. Code § 21068.5; State CEQA Guidelines § 15152(f). Accordingly, while the Project's incremental contribution to the significant operational air quality impact identified in the WC2035 Plan FEIR would be very limited, the impact would be significant and unavoidable, but was adequately addressed in the WC2035 Plan FEIR.

(d) Expose sensitive receptors to substantial pollutant concentrations?

Construction

Localized Construction Emissions

Less Than Significant Impact with Mitigation Incorporated. The WC2035 Plan FEIR anticipated that localized significance thresholds (LSTs) could be exceeded in the vicinity of some construction sites. It stated that localized construction emissions would potentially exceed the PM_{10} and $PM_{2.5}$ thresholds. Implementation of the mitigation measures with respect to construction air quality specified in the WC2035 Plan FEIR would reduce localized emission impacts to LAUSD schools within the WC2035 Plan area, including Woodland Hills Academy Middle School to less than significant levels. However, because specific construction activity under the WC2035 Plan could not be determined at the time the WC2035 Plan FEIR was prepared, localized construction emission impacts on other sensitive receptors (e.g., residential uses, hospital) were considered to be significant and unavoidable pending project-specific analyses of localized construction emissions on sensitive receptors. (WC2035 Plan DEIR, pp. 4.2-35-36, 43)

The closest sensitive receptors to the Project Site are (1) the residential area located approximately 50 meters (164 feet) to the east of the Project Site and (2) Woodland Hills Academy Middle School, which is located at 20800 Burbank Boulevard, approximately 0.1 mile (approximately 200 meters or 656 feet) to the southeast of the Project Site boundary across De Soto Avenue. The local construction emissions with respect to these sensitive receptors are analyzed below. In addition to the residential area to the east and Woodland Hills Academy Middle School to the southeast, there are other air quality-sensitive uses in the Project Site vicinity. The Kaiser Permanente Medical Center is located approximately 295 meters (968 feet) to the south of the Project Site and the Tutor Time daycare center is located approximately 107 meters (350 feet) to the north of the Project Site. Since both the hospital and daycare center are further away from construction activity relative to the residential area to the east of the Project Site, the impacts at the Kaiser Permanente Medical Center and Tutor Time would be less than the maximum localized construction impacts on the residential area. As discussed below, the Project's localized construction emission impact on the residential area would be less than significant. Therefore, no analysis of the localized air quality construction impacts on the Kaiser Permanente Medical Center and Tutor Time receptors, which are located much farther from the Project Site, is required.

In compliance with Mitigation Measure WC-AQ-14, an LST analysis that quantitatively evaluates the Project's potential construction air quality impact on Woodland Hills Academy Middle School was conducted using the methodology prescribed in the SCAQMD Localized Significance Threshold Methodology (June 2003, revised July 2008). The screening criteria provided in this

methodology were used to determine localized construction emissions thresholds for the Project. While not specifically required by Mitigation Measure WC-AC-14, this methodology was also used to evaluate the Project's potential construction emissions impact on the residential area east of the Project Site.

Construction emissions were estimated using CalEEMod (version 2016.3.2) and, consistent with the recommended mitigation measures with respect to construction air quality in the WC2035 Plan FEIR, incorporate fugitive dust control measures based on compliance with SCAQMD Rule 403. In addition, the emissions modeling analysis includes the quantifiable mitigation measures presented in the WC2035 Plan FEIR (i.e., WC-AQ-1 through WC-AQ-3). The LSTs are based on the SCAQMD screening criteria defined by location specific source receptor areas (SRAs), acreage of the Project Site, and the distance to the receptor being analyzed. The Project is located in SRA 6 West San Fernando Valley.

In order to estimate maximum localized impacts to the sensitive receptors identified above, the LST analysis evaluated all phases of construction, including the phases that are expected to overlap based on the schedule provided in the Project's plan set. As discussed previously in Section 3(b), Phase 1 building construction, paving, and architectural coating activities could potentially overlap with Phase 2 demolition and site preparation activities. Therefore, the localized emissions from Phase 1 building construction, paving, and architectural coating activities were conservatively added to the localized emissions from Phase 2 demolition and site preparation activities for the analysis below. Also, Phase 5 and Phase 6 could be built at the same time. Therefore, the maximum localized emissions from Phase 5 and Phase 6 construction activities have conservatively been added together for the analysis below.

The applicable LST screening levels were determined based on each phase's distance from the nearest residential area east of the Project Site and Woodland Hills Academy Middle School south of the Project Site. The LST distances are categorized by distances ranging from 25, 50, 100, 200, and 500 meters. The distance to the nearest residential area ranges from approximately 50 meters to 200 meters depending on the phase of construction activity. Since all phases of construction activity would be between 200 and 500 meters from Woodland Hills Academy Middle School, a conservative distance for 200 meters (656 feet) was used for all phases of construction for the school analysis. The individualized screening criteria for each phase of construction is presented in **Table B-2,** *Site-Specific LST Screening Criteria, below*.

The results of the localized impact analysis for the school is provided in **Table B-3,** *Maximum Daily Localized Construction Emissions – LST Analysis for Woodland Hills Academy Middle School*, and for the residential area in **Table B-4**, *Maximum Daily Localized Construction Emissions – LST Analysis for Closest Residential Area* (see Appendix A to this Tiered IS for detailed calculations). With respect to each criteria pollutant, the applicable threshold is compared to the greatest emission amount for any project phase. The emissions shown in Tables B-3 and B-4 reflect the potentially overlapping construction phases and activities, and therefore represent the potential maximum daily localized emissions from construction of the Project. As shown therein, maximum localized construction emissions for these sensitive receptors would not exceed the

applicable screening indicators for NO_X, CO, PM_{10}, or $PM_{2.5}$. Therefore, with respect to localized construction emissions, impacts to existing and future receptors would be less than significant. This is consistent with the determination in the WC2035 Plan FEIR that localized impact on school receptors would be mitigated to less than significant.

Since the Project's localized construction-related air quality impact on Woodland Hills Academy Middle School would be less than significant, the additional analysis described in Mitigation Measures WC-AQ-14 and WC-AQ-15 do not apply to the Project.

TABLE B-2
SITE-SPECIFIC LST SCREENING CRITERIA

Phase	Acreage[a]	Screening Distance (meters) to Woodland Hills Academy Middle School[b]	Screening Distance (meters) to Closest Residential Area[b]
Phase 1+2 Overlapping	>5	200	50
Phase 3	>5	200	50
Phase 4	3.6	200	50
Phase 5+6 Overlapping	3.6	200	100
Phase 7	0.9	200	200
Phase 8	1.8	200	200

a. Acreage estimated using Google Earth.

b. Distances estimated using Google Earth; 200 meters to Woodland Hills Academy Middle School represents a conservative estimate.

Source: ESA 2018

TABLE B-3
MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS – LST ANALYSIS FOR WOODLAND HILLS ACADEMY MIDDLE SCHOOL

	Project Emissions (pounds per day)			
Phase	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Phase 1+2 Overlapping	5	41	8.0	4.4
SCAQMD Significance Threshold	250	3,871	84.0	26.0
Exceed Threshold?	No	No	No	No
Phase 3	27	5	8.1	4.1
SCAQMD Significance Threshold	210	3,084	72.6	22.8
Exceed Threshold?	No	No	No	No
Phase 4	4	33	2.5	1.4
SCAQMD Significance Threshold	221	3,296	75.7	23.7
Exceed Threshold?	No	No	No	No
Phase 5+6 Overlapping	10	50	5.8	2.6
SCAQMD Significance Threshold	221	3,291	75.6	23.7
Exceed Threshold?	No	No	No	No
Phase 7	4	37	2.8	1.4
SCAQMD Significance Threshold	154	2,042	58.3	17.7
Exceed Threshold?	No	No	No	No
Phase 8	4	44	8.2	4.1

SCAQMD Significance Threshold	182	2,544	64.9	20.5
Exceed Threshold?	No	No	No	No

Source: ESA 2018; SCAQMD 2008

TABLE B-4
MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS – LST ANALYSIS FOR CLOSEST RESIDENTIAL AREA

	Project Emissions (pounds per day)			
Phase	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Phase 1+2 Overlapping	5	41	8.0	4.4
SCAQMD Significance Threshold	212	1,537	35.0	8.0
Exceed Threshold?	No	No	No	No
Phase 3	27	5	8.1	4.1
SCAQMD Significance Threshold	168	1,135	23.6	6.1
Exceed Threshold?	No	No	No	No
Phase 4	4	33	2.5	1.4
SCAQMD Significance Threshold	180	1,243	26.7	6.6
Exceed Threshold?	No	No	No	No
Phase 5+6 Overlapping	10	50	5.8	2.6
SCAQMD Significance Threshold	193	1,999	42.6	11.1
Exceed Threshold?	No	No	No	No
Phase 7	4	37	2.8	1.4
SCAQMD Significance Threshold	154	2,042	58.3	17.7
Exceed Threshold?	No	No	No	No
Phase 8	4	44	8.2	4.1
SCAQMD Significance Threshold	182	2,544	64.9	20.5
Exceed Threshold?	No	No	No	No

Source: ESA 2018; SCAQMD 2008

Operations

Localized Operational Emissions

Less Than Significant Impact. Impacts related to localized operational emissions were not analyzed in the WC2035 Plan FEIR. Therefore, this section includes an analysis of the Project's localized operational emissions. The operation of the Project has the potential to generate localized emissions. Similar to localized construction emissions, localized operational emissions were analyzed using methodology prescribed in the SCAQMD Localized Significance Threshold Methodology (June 2003, revised July 2008) and impacts were assessed for the closest sensitive receptor and the LAUSD school specifically mentioned in the WC2035 DEIR, which are Woodland Hills Academy Middle School and the closest residential area to the east of the Project.

As previously discussed, in addition to the residential area to the east of the Project Site and Woodland Hills Academy Middle School to the southeast, there are other air quality-sensitive uses in the project vicinity. The Kaiser Permanente Medical Center is located approximately 295 meters (968 feet) to the south of the Project Site and the Tutor Time daycare center is located approximately 107 meters (350 feet) to the north. Since both the hospital and daycare center are

located farther away from the Project Site than the residential area to the east, the impacts at the Kaiser Permanente Medical Center and Tutor Time receptors would be less than the maximum localized operational impact on the residential area. As discussed below, the Project's localized operational impact on the residential area would be less than significant. Therefore, no further analysis of the Project's localized air quality operational impacts on the Kaiser Permanente Medical Center and Tutor Time receptors, which are located much farther from the Project Site is required.

Localized operational emissions were analyzed for Phase 1 and the full buildout of the Project. For Phase 1, a site-specific LST screening criteria of 50 meters was used for the nearest residential area and 200 meters was used for Woodland Hills Academy Middle School, based on a 4.7-acre project site. After the completed construction of Phase 1, the Project's total operational acreage would be greater than the maximum acreage provided in the SCAQMD's LST mass rate emissions screening criteria. Therefore, the analysis conservatively analyzes the full buildout operations of the Project based on the 5-acre screening level at 50 meters for the nearest residential area and 200 meters for Woodland Hills Academy Middle School. This results in a conservative analysis since the screening criteria for a site larger than 5 acres would be greater than the screening criteria for a 5-acre site as provided in the SCAQMD's LST mass rate lookup tables. In other words, the LST screening criteria generally increase with increasing project site acreage, whereby a greater level of localized emissions would be necessary before exceeding the concentration-based LSTs. Thus, the use of the 5-acre screening criteria for full buildout of the Project is a conservative threshold for this localized operational emissions analysis.

The results of the localized operational impact analysis for the school is provided in **Table B-5,** *Maximum Daily Localized Operational Emissions – LST Analysis for Woodland Hills Academy Middle School*, and for the residential area in **Table B-6,** *Maximum Daily Localized Operational Emissions – LST Analysis for Closest Residential Area* (see Appendix A to this Tiered IS for detailed calculations). As shown therein, maximum localized operational emissions for these sensitive receptors would not exceed the localized screening indicators for NO_X, CO, PM_{10}, or $PM_{2.5}$. Since the Phase 1 and full buildout operational emissions are less than significant, it would also be the case that the Project's localized operational emissions at any stage of operations prior to full buildout would also be below the applicable screening thresholds. Therefore, Project's localized operational emissions impact on existing sensitive receptors would be less than significant.

Since the Project's localized operational air quality impact on Woodland Hills Academy Middle School would be less than significant, the additional analysis described in Mitigation Measures WC-AQ-14 and WC-AQ-15 do not apply to the Project.

TABLE B-5
MAXIMUM DAILY LOCALIZED OPERATIONAL EMISSIONS – LST ANALYSIS FOR WOODLAND HILLS ACADEMY MIDDLE SCHOOL

	Project Emissions (pounds per day)			
Phase	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Phase 1	2.4	34.6	0.3	0.3
Existing Buildings Removed [a]	(0.2)	(0.2)	(0.0)	(0.0)
Net Maximum Daily Emissions	2.2	34.4	0.3	0.3
SCAQMD Significance Threshold	243	3,746	20.5	6.8
Exceed Threshold?	No	No	No	No
Full Buildout	10.8	92.4	1.2	1.2
Existing Buildings Removed [b]	(1.4)	(1.3)	(0.1)	(0.1)
Net Maximum Daily Emissions	9.4	91.1	1.1	1.1
SCAQMD Significance Threshold	250	3,871	21.0	7.0
Exceed Threshold?	No	No	No	No

[a] Refers to emissions from the three Existing Buildings to be removed during Phase 1 of construction.
[b] Refers to emissions from all buildings to be removed for all phases.
Source: ESA 2018; SCAQMD 2008

TABLE B-6
MAXIMUM DAILY LOCALIZED OPERATIONAL EMISSIONS – LST ANALYSIS FOR CLOSEST RESIDENTIAL AREA

	Project Emissions (pounds per day)			
Phase	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Phase 1	2.4	34.6	0.3	0.3
Existing Buildings Removed [a]	(0.2)	(0.2)	(0.0)	(0.0)
Net Maximum Daily Emissions	2.2	34.4	0.3	0.3
SCAQMD Significance Threshold	205	1,473	8.6	2.0
Exceed Threshold?	No	No	No	No
Full Buildout	10.8	92.4	1.2	1.2
Existing Buildings Removed [b]	(1.4)	(1.3)	(0.1)	(0.1)
Net Maximum Daily Emissions	9.4	91.1	1.1	1.1
SCAQMD Significance Threshold	212	1,537	9.00	2.00
Exceed Threshold?	No	No	No	No

[a] Refers to emissions from the three Existing Buildings to be removed during Phase 1 of construction.
[b] Refers to emissions from all buildings to be removed for all phases.
Source: ESA 2018; SCAQMD 2008

CO Hotspots

Less Than Significant Impact. The WC2035 Plan FEIR concluded that CO concentrations would not significantly increase at any intersections in the WC2035 Plan area because the increase in trips would be offset by the decrease in emission rates for vehicles. (WC2035 Plan DEIR, p. 4.2-35)

This analysis is fully applicable to the Project. The Project's proposed land uses (i.e., residential, work-live, commercial office, retail, hotel and restaurant) and physical and operational characteristics of the Project would be consistent with development envisioned in the WC2035 Plan and the WC2035 Plan FEIR.

Moreover, the density of the Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced CO concentration impact as compared to the impact assumed in the WC2035 Plan FEIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact on CO concentrations.

Therefore, the Project would result in a less than significant impact for CO hotspots at local intersections, and this impact was adequately addressed in the WC2035 Plan FEIR.

Toxic Air Contaminants

Less Than Significant Impact. With respect to toxic air contaminants (TACs), the land uses analyzed in the WC2035 Plan FEIR do not include substantial sources of long-term TAC emissions, such as distribution centers, rail yards, ports, refineries, chrome platers, dry cleaners, and gasoline dispensing facilities. The WC2035 Plan FEIR identified potential impacts to future receptors sited within the WC2035 Plan area from exposure to TAC emissions generated from vehicles traveling on the US-101 Ventura Freeway. Since certain portions of the WC2035 Plan area are located adjacent to the US-101 Ventura Freeway, Mitigation Measure WC-AQ-16 requires the installation and maintenance of air filtration systems for occupied areas of buildings (excluding storage/warehouse areas or garages) within 500 feet of a freeway for commercial and industrial uses and residential uses that front on a major highway or are located adjacent to an active heavy rail line having efficiency equal to or exceeding ASHRAE Standard 52.2 MERV 13 (excluding storage/warehouse areas or garages) to reduce potential health risks from exposure to airborne toxic air contaminants from the US-101 Ventura Freeway. (WC2035 Plan DEIR, p. 4.2-36) Since the WC2035 Plan FEIR was prepared, the City has adopted more stringent requirements requiring filtration media of MERV 13 for regularly occupied areas of nonresidential uses within 1,000 feet of a freeway per LAMC Section 99.05.504.5.3 and for regularly occupied areas of residential uses within 1,000 feet of a freeway per LAMC Section 99.04.504.6.

This analysis is fully applicable to the Project. The Project's proposed land uses (i.e., residential, live-work, commercial office, retail, hotel and restaurant) and physical and operational characteristics of the Project are consistent with development envisioned in the WC2035 Plan and the WC2035 Plan FEIR. The Project would not include land uses associated with substantial

sources of long-term TAC emissions, such as distribution centers, rail yards, ports, refineries, chrome platers, dry cleaners, and gasoline dispensing facilities. Therefore, the Project would not generate substantial TAC emissions.

Moreover, while certain portions of the WC2035 Plan area are located adjacent to the US-101 Ventura Freeway, the Project Site is located over 1,500 feet to the north of the US-101 Ventura Freeway, which is outside of the 1,000-foot distance for non-residential uses in LAMC Section 99.05.504.5.3 and outside of the 1,000-foot distance for residential uses in LAMC Section 99.04.504.6 that triggers the use of enhanced air filtration requirements. (WC2035 Plan DEIR, p. 4.2-36)

Furthermore, the density of the Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced TAC impact as compared to the impact assumed in the WC2035 Plan FEIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact with respect to TACs.

For these reasons, the Project's impact on offsite sensitive receptors would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

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

Less Than Significant Impact. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any uses identified by SCAQMD as being associated with substantial odors. Furthermore, as stated in the WC2035 Plan FEIR, the Project would not include land uses that generate odors, such as certain industrial uses. (WC2035 Plan DEIR, p. 4.2-43) Therefore, the Project would not create objectionable odors affecting a substantial number of people. This impact would be less than significant and was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following mitigation measures from the WC2035 Plan FEIR are recommended for the Project to further reduce the potentially significant and less than significant impacts related to air quality (these mitigation measures have been non-substantively modified to apply specifically to the Project):

AQ-1: The Project shall use soil binders on soils exposed for extended periods of time (more than two weeks) to reduce fugitive dust. In addition, the Project shall include the following measures as applicable and feasible for each phase of the Project:

1) Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.

2) Provide dedicated turn lanes for movement of construction trucks and equipment, on-and off-site.

3) Reroute construction trucks away from congested streets or sensitive receptor areas.

4) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM_{10} generation.

5) Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

6) Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113.

7) Construct or build with materials that do not require painting.

8) Require the use of pre-painted construction materials.

9) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export).

10) During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher, according to the following:

- All off road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT 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.

- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

- Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate cleanup of

off-road diesel vehicles, such as heavy-duty construction equipment. More information on this program can be found at the following website: http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines.

11) Other measures as applicable that may be recommended by SCAQMD on their web site or elsewhere: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies.

AQ-2: The Applicant shall ensure that ground cover be reestablished on construction sites through seeding and watering on completion of construction (or if sites are to remain undeveloped for more than a year) for each phase of the Project.

AQ-3: The Applicant shall ensure that trucks leaving construction sites be washed to reduce track-out dirt and dust.

AQ-4: The Applicant shall provide rideshare and transit incentives to construction personnel.

AQ-5: The Applicant shall configure construction parking to minimize interference with traffic lanes.

AQ-6: The Applicant shall minimize the obstruction of through-traffic in the vicinity of each construction site.

AQ-7: The Applicant and City Departments shall require the use of flag people during construction to guide traffic properly.

AQ-8: The Applicant shall ensure that construction activities that could affect roadways be scheduled for off-peak periods.

AQ-9: Project construction personnel (as well as City construction personnel associated with construction of roadway and other infrastructure) shall ensure that that construction vehicles avoid, to the extent feasible, travel on streets immediately adjacent to Canoga Park High School, Woodland Hills Academy Middle School and Hart Elementary School throughout the construction phase for each phase of the Project to reduce potentially significant project specific and cumulative construction-related air quality impacts. The Applicant shall ensure that haul routes are designed to comply with this measure.

AQ-10: Each phase of the Project located within 0.5 mile of Woodland Hills Academy Middle School shall be subject to a construction fee that provides for funding for the replacement of air filters at the beginning and at the conclusion of construction in any air conditioning units at the affected school site.

AQ-11: For each phase of the Project located within 0.5 mile of Woodland Hills Academy Middle School, the Applicant shall provide advance notification of the Project's anticipated general construction schedule and a specific schedule for site grading and preparation activities, and shall allow the affected school 15 days to review and comment on the schedule. In addition, any such project phase shall be required to provide personnel on a daily basis to wash the playground, lunch areas, and seating areas at the affected school site during active grading and earth moving phases of the construction, as coordinated with the appropriate school administrative staff.

AQ-12: For each phase of the Project located within 0.5 mile of Woodland Hills Academy Middle School, the Applicant shall, as a condition of the Project Permit Compliance Review, execute a covenant to implement feasible mitigation measures, including all measures identified above.

AQ-13: For each phase of the Project located within 0.5 mile of Woodland Hills Academy Middle School, the Applicant shall contribute a fair share to the Warner Center Air Quality Trust Fund by paying the Construction Air Quality Impact Assessment (CAQIA) fee prior to the issuance of any building, demolition, grading or foundation permit. The CAQIA Fee shall be $0.10 per square foot of proposed surface area disturbed or greater as may be identified in a subsequent fair share study.

AQ-22: All landscaping shall be required to be drought tolerant to reduce water consumption and provide passive solar benefits.

4. Biological Resources

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) determined that the WC2035 Plan area is almost entirely urbanized, with the exception of some vacant lots in the northern and eastern WC2035 Plan area. The land surrounding the WC2035 Plan area is entirely urbanized and includes ornamental landscaping, generally comprised of non-native species that are utilized for aesthetic purposes. The WC2035 Plan area itself consists of commercial and residential land uses. Several sensitive plant and animal species are known to recently or historically have occurred in the WC2035 Plan Area vicinity. (WC2035 Plan DEIR, page 4.3-3) However, there are no candidate, sensitive, native or special-status plant communities within the WC2035 Plan area, nor are there any candidate, sensitive or special-status plant or wildlife species. Wildlife in the WC2035 Plan area is limited to common wildlife and species that are tolerant of urban environments and human activities. The WC2035 Plan area is not located within a Habitat Conservation Plan area or Natural Community Plan area. The WC2035 Plan FEIR stated that construction activities associated with the implementation of the WC2035 Plan could result in the loss of non-native landscaping trees, which in turn has the potential to result in the direct mortality of species protected by the Migratory Bird Treaty Act during the breeding season. In addition, construction activity could cause nest abandonment and the death of young birds or loss of reproductive potential at active nests close to construction sites. (WC2035 Plan DEIR, pp. 4.3-1, 11, 13, 23, 25-26)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended five mitigation measures, designated as WC-BIO-1 through WC-BIO-5, with respect to potentially significant impacts and less than significant impacts on biological resources (WC2035 Plan FEIR, pp. V-11-13). Of those mitigation measures, the following two are potentially applicable to the Project:

WC-BIO-1: For development in the Specific Plan area the City should require avoiding disturbance of any nests protected by the Migratory Bird Treaty Act: If construction activities (i.e., removal of trees or shrubs) are scheduled to occur during the non-breeding season (September 1 through January 31), no mitigation is required. If construction activities are scheduled to occur during the breeding season (February 1 through August 31), the project proponent will implement the following measures to avoid potential adverse effects on birds covered by the Migratory Bird Treaty Act:

- No more than two weeks prior to construction, a qualified wildlife biologist will conduct preconstruction surveys of all potential nesting habitat within 500 feet of construction activities where access is available.
- If active nests are found during preconstruction surveys, the project proponent will create a no disturbance buffer (acceptable in size to the CDFG) around active raptor nests and nests of other special-status birds during the breeding season, or until it is determined that all young have fledged. Typical buffers include 500 feet for raptors and 250 feet for other nesting birds. The size of these buffer zones and types of construction activities restricted in these areas may be further modified during coordination and in consultation with the CDFG and will be based on existing noise and human disturbance levels at the project site. Nests initiated during construction are presumed to be unaffected, and no buffer would be necessary. However, the "take" (mortality, severe disturbance to, etc.) of any individual birds will be prohibited.
- If preconstruction surveys indicate that nests are inactive or potential habitat is unoccupied during the construction period, no further mitigation is required. Trees and shrubs within the construction footprint that have been determined to be unoccupied by birds covered by the Migratory Bird Treaty Act or that are located outside the no-disturbance buffer for active nests may be removed.

WC-BIO-2: For development in the Specific Plan area the City shall require replacement of the loss of any protected trees in accordance with the Los Angeles Protected Tree Ordinance: Replace all on-site trees to ensure continuation of the urban forest. Replace all nonnative trees greater than 10 centimeters (4 inches) in diameter at breast height (4.5 feet above surrounding grade) with native or non-native (non-invasive) trees of appropriate local climate tolerance at a 2:1 ratio. For native species, source materials should be from seeds or cuttings gathered within coastal southern California to ensure local provenance.

Several other mitigation measures recommended in the WC2035 Plan FEIR do not apply to the Project. WC-BIO-3 addresses impacts to the known roosts of special-status bats within several vehicle bridge overpasses within the WC2035 Plan area, and are not applicable to the Project because the Project Site is not located within 200 feet of any of the bridges. Mitigation Measures WC-BIO-4 and WC-BIO-5 are not applicable to the Project because they relate to potentially significant impacts associated with the construction of the planned Variel Avenue roadway and bridge crossing the Los Angeles River. (WC2035 Plan DEIR, pp. 4.3-27-28)

As discussed below, Mitigation Measures WC-BIO-1 and WC-BIO-2 are recommended as mitigation measures for the Project.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts related to biological resources, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

Would the project:

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

No Impact. The WC2035 Plan FEIR (which includes the WC2035 Plan FEIR) stated that the WC2035 Plan area (which includes the Project Site) is almost entirely urbanized, with the exception of some vacant lots in the northern and eastern WC2035 Plan areas. Vegetation in the WC2035 Plan area is, consequently, ornamental (non-native). As previously stated, there are no candidate, sensitive or special-status plant communities in the WC2035 Plan area, and no candidate, sensitive or special-status plant or wildlife species. Wildlife in the WC2035 Plan area is limited to common wildlife and species that are tolerant of urban environments and human activities. (WC2035 Plan DEIR, pp. 4.3-1, 3-11, 25-26)

This analysis applies fully to the Project Site, which has been completely developed for many years. Therefore, this environmental topic was adequately addressed in the WC2035 Plan FEIR and the Project would have no impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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 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 WC2035 Plan DEIR stated that there are no areas containing riparian habitat areas or sensitive natural communities, as defined by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service within the WC2035 Plan area, including the Project Site. Therefore, this environmental topic was adequately addressed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) and the Project would have no impact 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. (WC2035 Plan DEIR, p. 4.3-13)

(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?

No Impact. The WC2035 Plan FEIR stated that there are no federally protected wetlands or "waters of the US" located within the WC2035 Plan area, including the Project Site. Therefore, this environmental topic was adequately addressed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) and the Project would have no impact on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.). (WC2035 Plan DEIR, p. 4.3-13)

(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?

Less Than Significant Impact with Mitigation Incorporated. The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) stated that construction activities associated with the implementation of the WC2035 Plan could result in the loss of landscape trees, which in turn has the potential to result in the direct mortality of species protected by the Migratory Bird Treaty Act. In addition, construction activity could cause nest abandonment and the death of young birds or loss of reproductive potential at active nests close to construction sites. As stated in the WC2035 Plan FEIR, the potential exists for nesting birds to be present in the trees on the Project Site during breeding season, and construction activity as well as the eventual planned removal of the trees could disturb active nests during the breeding season. (WC2035 Plan DEIR, p. 4.3-23)

The WC2035 Plan FEIR concluded that, with the implementation of Mitigation Measure WC-BIO-1, the impact of anticipated development in the WC2035 Plan area (which includes the Project Site) on species protected by the Migratory Bird Treaty Act would be less than significant.

Therefore, with the implementation of Mitigation Measure WC-BIO-1, the Project's impact on species protected by the Migratory Bird Treaty Act would be less than significant and this impact was adequately addressed in the WC2035 Plan FEIR.

(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact with Mitigation Incorporated. The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) identified one local ordinance with which development within the WC2035 Plan area could potentially conflict. That is the City's protected tree ordinance, which is set forth in Section 17.05.R of the LAMC (Tree Ordinance) and regulates the removal of "protected" trees. The protected trees include certain native tree species. As discussed in the WC2035 Plan FEIR, the only type of protected tree within the WC2035 Plan area is the Western Sycamore. According to the *Tree* Survey, prepared by LRM Landscape Architecture, January 9, 2017, included as Appendix B to this Tiered IS, there are a total of 569 existing trees on the Project Site, none of which is a Western Sycamore or other protected tree subject to the Tree Ordinance.

In addition, there are 41 offsite street trees adjacent to the Project Site (26 along Burbank Boulevard and 15 along De Soto Avenue). The most prevalent tree species on the Project Site are London Plane, Brisbane Box, Liquidamber, and Brazilian Pepper, with a few additional trees from the Red River Gum, Red Ironbark, Chinese Elm, Modesto Ash, Paper Bark Tree, Southern Magnolia, Jacaranda, Canary Island Pine, Crape Myrtle, Purple Hopseed Bush, Carrotwood, and Hollywood Juniper species. None of the trees are native species. All of the existing onsite trees and 28 of the offsite street trees would be removed as part of the Project and all of the removed trees greater than 10 centimeters (4 inches) in diameter at breast height (4.5 feet above surrounding grade), which includes 542 of the removed onsite trees and all 28 of the removed street trees (13 along Burbank Boulevard and 15 along De Soto Avenue) shall be replaced with native or non-native (non-invasive) trees of appropriate local climate tolerance at a 2:1 ratio in accordance with Mitigation Measure WC-BIO-2. Although Mitigation Measure WC-BIO-2 does not specify the size of the replacement trees, the size of each replacement tree shall be a 24-inch box.

Tree removal by phase would occur as follows:

- Phase 1: Building 1
    - 115 onsite trees
    - 9 offsite street trees
- Phase 2: Building 2
    - 67 onsite trees
    - No offsite street trees
- Phase 3: Buildings 8 and 9
    - 73 onsite trees

    - 11 offsite street trees
- Phase 4: Building 6
    - 42 onsite trees
    - No offsite street trees
- Phase 5: Building 5
    - 57 onsite trees
    - No offsite street trees
- Phase 6: Building 3
    - 86 onsite trees
    - No offsite street trees
- Phase 7: Building 7
    - 39 onsite trees
    - 4 offsite street trees
- Phase 8: Buildings 4 and 4a
    - 90 onsite trees
    - 4 offsite street trees

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) concluded that, with the implementation of Mitigation Measure WC-BIO-2, the impact of anticipated development in the WC2035 Plan area (which includes the Project Site) would not conflict with the Tree Ordinance and would therefore be less than significant with respect to the removal of protected trees.

Therefore, with the implementation of Mitigation Measure WC-BIO-2, the Project would not conflict with any local policy or ordinance protecting biological resources, such as a tree preservation policy or ordinance, so that this impact would be less than significant and was adequately addressed in the WC2035 Plan FEIR.

(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?

No Impact. The WC2035 Plan FEIR stated that the WC2035 Plan area, including the Project Site, is not located within a Habitat Conservation Plan or Natural Community Area (WC2035 Plan DEIR, p. 4.3-13). Therefore, this environmental topic was adequately addressed in the WC2035 Plan FEIR, so that the Project would not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan and would have no impact with respect to this environmental topic.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following mitigation measures from the WC2035 Plan FEIR are recommended for the Project to further reduce the less than significant impacts related to biological resources (these mitigation measures have been non-substantively modified to apply specifically to the Project):

BIO-1: The development of the Project shall avoid disturbance of any nests protected by the Migratory Bird Treaty Act: If construction activities (i.e., removal of trees or shrubs) are scheduled to occur during the non-breeding season (September 1 through January 31), no mitigation is required. If construction activities are scheduled to occur during the breeding season (February 1 through August 31), the project proponent will implement the following measures to avoid potential adverse effects on birds covered by the Migratory Bird Treaty Act:

- No more than two weeks prior to construction, a qualified wildlife biologist will conduct preconstruction surveys of all potential nesting habitat within 500 feet of construction activities where access is available.
- If active nests are found during preconstruction surveys, the project proponent will create a no disturbance buffer (acceptable in size to the CDFG) around active raptor nests and nests of other special-status birds during the breeding season, or until it is determined that all young have fledged. Typical buffers include 500 feet for raptors and 250 feet for other nesting birds. The size of these buffer zones and types of construction activities restricted in these areas may be further modified during coordination and in consultation with the CDFG and will be based on existing noise and human disturbance levels at the project site. Nests initiated during construction are presumed to be unaffected, and no buffer would be necessary. However, the "take" (mortality, severe disturbance to, etc.) of any individual birds will be prohibited.
- If preconstruction surveys indicate that nests are inactive or potential habitat is unoccupied during the construction period, no further mitigation is required. Trees and shrubs within the construction footprint that have been determined to be unoccupied by birds covered by the Migratory Bird Treaty Act or that are located outside the no-disturbance buffer for active nests may be removed.

BIO-2: Replacement for the loss of any protected trees shall be required in accordance with the Los Angeles Protected Tree Ordinance: Replace all on-site trees to ensure continuation of the urban forest. Replace all non-native trees greater than 10 centimeters (4 inches) in diameter at breast height (4.5 feet above surrounding grade) with native or non-native (non-invasive) trees of appropriate local climate tolerance at a 2:1 ratio. For native species, source materials should be from seeds or cuttings gathered within coastal southern California to ensure local provenance.

5. Cultural Resources

WC2035 Plan FEIR Findings

Historic Resources

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) did not identify any known historical resources within the WC2035 Plan area. However, due to the programmatic nature of the WC2035 Plan FEIR, it was acknowledged that site-specific analysis would be necessary for individual development proposals undertaken over time to determine whether any historical resources would be impacted by those projects. Consistent with that discussion, Mitigation Measure WC-CUL-2 in the WC2035 Plan FEIR requires that in the event a development project is proposed on a site containing a potential historic property, a site-specific historic resources assessment is required to determine whether the potential historic property qualifies as an historical resource under CEQA. (WC2035 Plan DEIR, pp. 4.4-3, 10, WC2035 Plan FEIR, p. V-13)

Archaeological Resources

The WC2035 Plan FEIR did not identify any known archaeological resources within the WC2035 Plan area. Development within the WC2035 Plan area would occur in an already developed area of the City, and the area has previously been extensively disturbed with the development of a variety of buildings, structures and uses. However, the WC2035 Plan FEIR concluded that, while not expected, construction activities associated implementation of individual projects, had the potential to unearth previously undocumented resources, and therefore, cause a substantial adverse change in the significance of an archaeological resource. This unexpected but potentially significant impact would be reduced to a less than significant level with the implementation of Mitigation Measure WC-CUL-3 in the WC2035 Plan FEIR, which requires archaeological monitoring by a qualified archaeologist, and Mitigation Measure WC-CUL-4, which requires the construction contractor to verify that work is halted if cultural resources are discovered during construction activities, as described further below. (WC2035 Plan DEIR, pp. 4.4-5, 11, WC2035 Plan FEIR, p. V-13)

Paleontological Resources

The WC2035 Plan FEIR concluded that surface grading and shallow excavations within the WC2035 Plan area were unlikely to encounter significant vertebrate fossils in the younger Quaternary Alluvium. However, there was a remote potential that deeper excavations which extend into older deposits could uncover significant fossil vertebrate remains. If such resources are disturbed, the impact would be potentially significant. The remote possibility for this potentially significant impact would be reduced to a less than significant level with the implementation of Mitigation Measure WC-CUL-6 in the WC2035 Plan FEIR, which requires a qualified paleontologist to monitor excavation activities below previously disturbed materials, and Mitigation Measure WC-CUL-4, which requires the construction contractor to verify that work is halted if cultural resources are discovered during construction activities, as described further below. (WC2035 Plan DEIR, p. 4.4-11, WC2035 Plan FEIR, p. V-14)

Human Remains

The WC2035 Plan FEIR concluded that there are no known formal cemeteries within the WC2035 Plan area. However, construction activities could result in the disturbance of human remains, including those interred outside of formal cemeteries. As no known archaeological sites are present in the WC2035 Plan area, which is underlain by disturbed soils, the presence of human remains is a remote possibility. The remote possibility for this potentially significant impact would be reduced to a less than significant level with the implementation of Mitigation Measure WC-CUL-5 in the WC2035 Plan FEIR, which requires compliance with Sections 5097 and 7050.5 of the California Health and Safety Code in the event that potential human remains of Native American origin are discovered during ground-disturbing activities, and Mitigation Measure WC-CUL-4, which requires the construction contractor to verify that work is halted if cultural resources are discovered during construction activities, as described further below. (WC2035 Plan DEIR, pp. 4.4-11-12, WC2035 Plan FEIR, pp. V-13-14)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended six mitigation measures, designated as WC-CUL-1 through WC-CUL-6, with respect to potentially significant impacts on cultural resources (WC2035 Plan FEIR, pp. V-13-14). Of those mitigation measures, the following four are potentially applicable to the Project:

WC-CUL-3: For discretionary projects in the Specific Plan area the City shall require that archaeological monitoring, by a qualified archaeologist, of grading of subsurface materials not previously disturbed shall be undertaken. If buried cultural resources are discovered during ground-disturbing activities, work will stop in that area and within 100 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures. If during cultural resources monitoring the qualified archaeologist determines that the sediments being excavated are previously disturbed or unlikely to contain significant cultural materials, the qualified archaeologist can specify that monitoring be reduced or eliminated will verify that work is halted until appropriate site-specific treatment measures are implemented.

WC-CUL-4: For discretionary projects in the Specific Plan area the City shall require that if cultural resources are discovered during construction activities, the construction contractor will verify that work is halted until appropriate site-specific treatment measures are Implemented.

[The end of the sentence was inadvertently omitted in Mitigation Measure WC-CUL-4 in the WC2035 Plan FEIR, so the remainder of that sentence below was completed with text from the equivalent WC2035 Plan DEIR mitigation measure (WC2035 Plan DEIR, p. 4.4-13, WC2035 Plan FEIR, p. V-13).]

WC-CUL-5: For discretionary projects in the Specific Plan area the City shall require that if human remains of Native American origin are discovered during

ground-disturbing activities, it is necessary to comply with state laws relating to the disposition of Native American burials that fall within the jurisdiction of the California Native American Heritage Commission (Public Resources Code Section 5097). According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the coroner must contact the California Native American Heritage Commission to determine the most likely descendent(s). The most likely descendent shall determine the most appropriate means of treating the human remains and any associated grave artifacts, and shall oversee disposition of the human remains and associated artifacts by the project archaeologists.

WC-CUL-6: For discretionary projects in the Specific Plan area the City shall require that a qualified paleontological monitor shall monitor excavation activities below previously disturbed materials. The qualified paleontological monitor shall retain the option to reduce monitoring if, in his/her professional opinion, potentially fossiliferous units, are not found to be present or, if present, are determined by qualified paleontological personnel to have low potential to contain fossil resources.

The WC2035 Plan FEIR did not identify any historical resources within the WC2035 Plan area. Mitigation Measure WC-CUL-1 is not applicable to the Project because it requires the preservation, rehabilitation, restoration or adaptive reuse of known historical resources. Mitigation Measure WC-CUL-2 requires the preparation of a site-specific historic resources assessment for any project proposed on a site with a potential historic property (more than 45 years in age). WC-CUL-2 did not require the preparation of a historic resources assessment for the Project, because none of the 12 Existing Buildings on the Project Site are more than 45 years in age. Nonetheless, a Cultural Resources Assessment, dated March 2018, was prepared by ESA (Cultural Resources Assessment), included as Appendix C to this Tiered IS, in part to confirm that no historical resources are located on the Project Site. In addition, a Paleontological Resources Assessment, dated March 2018, was prepared by ESA (Paleontological Resources Assessment), included as Appendix D to this Tiered IS, to determine if the Project would impact any unique paleontological resource.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts related to cultural resources, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

Would the project:

(a) Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines §15064.5?

Less Than Significant Impact. The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) concluded that the WC2035 Plan area (which includes the Project Site) did not include any structures listed on the National Register of Historic Places or any California Historical Landmark or California Point of Historical Interest within one-half mile of the WC2035 Plan area. The California Register of Historic Resources (California Register) and the City's Historic-Cultural Monuments each include two properties within a one-half mile radius of the WC2035 Plan area, none of which are located on the Project Site. The WC2035 Plan FEIR concluded that, given that no known historic or potentially historic resources or sites are located in the WC2035 Plan area, it was not anticipated that development of the Project would result in any impacts to historic sites. (WC2035 Plan DEIR, p. 4.4-10)

The WC2035 Plan FEIR went on to acknowledge, however, that future development could include the demolition of a historic resource or development near a historic resource that would diminish the integrity of the historic resource. Due to the programmatic nature of the WC2035 Plan FEIR, it was acknowledged that site-specific analysis would be necessary for individual development proposals undertaken over time to determine whether any historical resources would be impacted by those projects. It further recognized the possibility that additional sites not currently identified as historically significant could become historic during the planning horizon of the WC2035 Plan. As such, site-specific analysis was considered necessary for individual development projects undertaken over time. Consistent with that discussion, Mitigation Measure WC-CUL-2 requires that, in the event, a development project is proposed on a site containing a potential historic property, a site-specific historic resources assessment is required to determine whether the potential historic property qualifies as an historical resource under CEQA. (WC2035 Plan DEIR, p. 4.4-10, WC2035 Plan FEIR, p. V-13)

Direct Impacts

The site-specific Cultural Resources Assessment was conducted to assess the potential for the Project to impact onsite and offsite historic resources. The Project Site is currently improved with the 12 commercial Existing Buildings, as shown in **Table B-7,** *Existing Buildings Within the Project Site*. The buildings were constructed between 1981 and 1985 and designed in the Corporate International style with some elements of Post Modernism by Ware Malcomb, architects. Ware Malcomb was founded in California in 1972 by architects Bill Ware and Bill Malcomb. They focused most of their efforts in designing commercial office, industrial, corporate, and tenant improvements through the 1980s. After the 1980s, they grew their business and portfolio expanding into healthcare and technology projects. The contractor was Valley Construction Company. Ware Malcomb designed many corporate business centers across California and the United States. However, the existing corporate business park on the Project Site is a late addition to the movement, which started in the 1950s. This trend was successful in Southern California due to prominent architectural firms such as Welton Becket and Associates, and William L. Pereira & Associates adopting the idea. The Existing Buildings, which range in age from 33 to 37 years, are low-rise

corporate buildings, with no notable architectural features or design. The 12 Existing Buildings are not architecturally significant and did not influence the trends of the area, and do not appear to be the work of master architects. (Cultural Resources Assessment, pp. 35-36, Table 5)

TABLE B-7
EXISTING BUILDINGS WITHIN THE PROJECT SITE

Address	APN #	Current Use	Construction Date	Architect/Builder	Photograph
20935 Warner Center Lane	2149-017-004	Commercial/Office	1982	Ware Malcomb, architects/Valley Construction Co., contractors	
20955 Warner Center Lane	2149-017-005	Commercial/Office	1981	Ware Malcomb, architects/Valley Construction Co., contractors	
21011 Warner Center Lane	2149-017-006	Commercial/Office	1982	Ware Malcomb, architects/Valley Construction Co., contractors	
21031 Warner Center Lane	2149-017-007	Commercial/Office	1982	Ware Malcomb, architects/Valley Construction Co., contractors	

Address	APN #	Current Use	Construction Date	Architect/Builder	Photograph
21051 Warner Center Lane	2149-017-008	Commercial/Office	1981	Ware Malcomb, architects/Valley Construction Co., contractors	
21041 Burbank Boulevard	2149-017-009	Commercial/Office	1981;	Ware Malcomb, architects/Valley Construction Co., contractors	
20970 Warner Center Lane	2149-017-010	Commercial/Office	1984	Ware Malcomb, architects/Valley Construction Co., contractors	
20950 Warner Center Lane	2149-017-011	Commercial/Office	1984	Ware Malcomb, architects/Valley Construction Co., contractors	

Address	APN #	Current Use	Construction Date	Architect/Builder	Photograph
20920 Warner Center Lane	2149-017-012	Commercial/Office	1984	Ware Malcomb, architects/Valley Construction Co., contractors	
20931 Burbank Boulevard	2149-017-013	Commercial/Office	1984	Ware Malcomb, architects/Valley Construction Co., contractors	
20951 Burbank Boulevard	2149-017-016	Commercial/Office	1985	Ware Malcomb, architects/Valley Construction Co., contractors	
20971 Burbank Boulevard	2149-017-015	Commercial/Office	1984	Ware Malcomb, architects/Valley Construction Co., contractors	

Based on the results of the Cultural Resources Assessment, the 12 Existing Buildings do not embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values. They are not associated with any events that have made a significant contribution to the broad patterns of California's history and cultural heritage, nor are they associated with the lives of persons important in our past. Finally, the Existing Buildings do not yield, and are not likely to yield, information

important in prehistory or history. In short, they do not satisfy any of the criteria for listing in the California Register. Moreover, buildings that are less than 45 years in age normally do not qualify as historical resources, and there is no exceptional circumstance here that would justify the characterization of any of these 1980's corporate buildings as historical resources. (Cultural Resources Assessment, pp. 23, 35-36)

Consistent with the Cultural Resources Assessment, and as previously discussed, none of the Existing Buildings has been designated as a historical resource at the federal, state or local level and none of them has been identified as a potential historical resource in any historical resources survey. For these reasons, none of the Existing Buildings qualify as historical resources, as that term is defined under CEQA, and the Project would therefore have no impact on any onsite historical resource. (Cultural Resources Assessment, pp. 23, 35-36)

Indirect Impacts

The potential for the Project to materially impair the integrity of any offsite historical resource was also evaluated in the Cultural Resources Assessment. The study area for the evaluation of potential indirect impacts was within a one-quarter mile radius of the Project Site. One historical resource within the study area, the Litton Systems/Northrup Grumman Campus (Campus), has direct views of the Project Site, and this resource was previously identified through SurveyLA, a Citywide survey that identified and documented historic resources representing important themes in the City's history. The Campus is located southwest of the Project Site, across Burbank Boulevard. This resource has not been evaluated for listing in the National Register, the California Register or City Historic-Cultural Monument, but it has been evaluated in SurveyLA as a historical resource with significance under California Register Criteria 1 and 3, for its association with broad historical patterns or events, and for architectural significance or as a work of a master architect, respectively. The Campus is a significant Cold War-era defense and manufacturing facility (aerospace plant), and played a significant role in the overall defense industry of the nation and the development of the San Fernando Valley. It is also an example of an industrial campus with Mid-Century Modern buildings designed by noted architects Martin and Charles Luckman. (Cultural Resources Assessment, p. 41)

The heights of the New Buildings along Burbank Boulevard would introduce a new visual element that would be visible from the Campus across the street. However, the development of the Project would not affect the setting of the Campus or the ability of the Campus to convey its historic significance. Specifically, the Project would not affect the setting of the Campus, because (1) the buildings that comprise the resource are located a substantial distance from the Project Site and are further separated from the Project Site by Burbank Boulevard, (2) the development of the Project would not interfere with any proximate view of the Campus, and (3) the setting of the Campus has been previously and significance eroded by infill development that occurred in the 1980s and again in the 2000s. (Cultural Resources Assessment, pp. 41-42)

Therefore, the Project would not cause a substantial adverse change in the significance of a historical resource as defined by CEQA Section 15064.5, and the impact would be less than significant.

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

Less Than Significant with Mitigation Incorporated. The WC2035 Plan did not identify any known archaeological resources within the WC2035 Plan area. Development within the WC2035 Plan area would occur in an already developed area of the City, and much of the area has previously been extensively disturbed with the development of a variety of buildings, structures and uses. However, the WC2035 Plan FEIR concluded that, while not expected, construction activities associated implementation of individual projects, had the potential to unearth previously undocumented resources, and therefore, cause a substantial adverse change in the significance of an archaeological resource. This unexpected, but potentially significant impact would be reduced to a less than significant level with the implementation of Mitigation Measure WC-CUL-3 in the WC2035 Plan FEIR, which requires archaeological monitoring by a qualified archaeologist, and Mitigation Measure WC-CUL-4, which requires the construction contractor to verify that work is halted if cultural resources are discovered during construction activities, as described further below. (WC2035 Plan DEIR, pp. 4.4-5, 11, WC2035 Plan FEIR, p. V-13)

This analysis is fully applicable to the Project. The Project will be subject to Mitigation Measures WC-CUL-3 and WC-CUL-4 to ensure that any potential impact on archaeological resources would be less than significant.

For informational purposes, and to more conclusively determine whether any archaeological resources are located within the Project Site, a records search was conducted for the Project Site at the California Historical Resources Information System South Central Coastal Information Center, housed at California State University, Fullerton, including a review of all recorded archaeological resources and previous studies within the Project Site and within a one-half-mile radius of the Project Site. Those records did not identify any archaeological resources within the Project Site. (Cultural Resources Assessment, p. 35)

In addition, a pedestrian survey of the Project Site was conducted, but did not identify any archaeological resources. Furthermore, a Sacred Lands File search conducted by the California Native American Heritage Commission indicated that no known Native American cultural resources are located within the Project Site, although it noted that the absence of specific site information does not indicate the absence of Native American cultural resources in any project site. (Cultural Resources Assessment, p. 29)

Therefore, with the implementation of Mitigation Measures WC-CUL-3 WC-CUL-4, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines 15064.5. As such, this impact would be less than significant and was adequately addressed in the WC2035 Plan FEIR.

(c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporated. The WC2035 Plan FEIR concluded that surface grading and shallow excavations within the WC2035 Plan area were unlikely to encounter significant vertebrate fossils in the younger Quaternary Alluvium. Nonetheless, the WC2035 Plan FEIR conservatively stated that, while not expected, there was a remote potential that deeper excavations that extend into older deposits could uncover significant fossil vertebrate remains. If these resources are disturbed, the impact on paleontological resources would be potentially significant. The remote possibility for this potentially significant impact would be reduced to a less than significant level with the implementation of Mitigation Measure WC-CUL-6 in the WC2035 Plan FEIR, which requires a qualified paleontologist to monitor excavation activities below previously disturbed materials, and Mitigation Measure WC-CUL-4, which requires the construction contractor to verify that work is halted if cultural resources are discovered during construction activities. (WC2035 Plan DEIR, p. 4.4-11, WC2035 Plan FEIR, p. V-14)

This analysis is fully applicable to the Project. The Project would be subject to Mitigation Measures WC-CUL-6 and WC-CUL-4 to ensure that any potential impact on paleontological resources would be less than significant.

For informational purposes, and to more conclusively determine whether any paleontological resources are located within the Project Site, a site-specific paleontological resources assessment was conducted, which included a records search for the Project Site at the Natural History Museum of Los Angeles County (LACM). The records search included a review of all recorded paleontological resources within the Project Site or from similar geologic units in the vicinity of the Project Site. Those records did not identify any paleontological resources within the Project Site. However, a number of nearby fossil localities were identified from geologic units similar to those found in the subsurface of the Project Site. The closest of these is located south-southwest of the Project Site, where a horse (*Equus*) and ground sloth (*Paramylodon*) were recovered from older alluvial deposits off of Mulholland Highway. Two mammoth (*Mammut*) skeletons have been recovered from older alluvial sediments at some distance from the Project Site: one is approximately five miles, west-southwest of the Project Site, and the other is approximately nine miles northwest of the Project Site. (Paleontological Resources Assessment, p. 7)

The records search conducted for the Project Site also indicates that older alluvial sediments are likely present in the subsurface of the Project Site because older Quanternary deposits are known in the Project vicinity and have preserved scientifically significant fossils. These sediments may be old enough to preserve fossil resources. Therefore, subsurface older alluvial sediments have a high paleontological sensitivity. (Paleontological Resources Assessment, pp. 7, 10)

In addition to the records search by LACM, a geologic mapping and geotechnical analysis for the Project Site was conducted to determine the paleontological sensitivity of the Project Site's subsurface. The analysis indicates that the Miocene-aged Modelo Formation is located immediately east of the Project Site across De Soto Avenue, and therefore is also likely present in the subsurface of the Project Site. Because the geotechnical studies conducted for the Project Site did not identify

the Modelo Formation in any boreholes, the Paleontological Resources Assessment concluded that the Modelo Formation is likely as much as 75 feet below the ground surface of the Project Site. The Modelo Formation, and its equivalent in the Los Angeles Basin, the Puente Formation, has been well-documented as preserving a wide range of significant fossils. Therefore, the Modelo Formation has high paleontological sensitivity. Excavations that exceed the depth of younger surficial alluvium into either the older alluvium or the underlying Modelo Formation may encounter fossil resources. (Paleontological Resources Assessment, pp. 7-8, 10)

In addition, the Paleontological Resources Assessment stated that the Miocene-aged Modelo Formation is mapped as occurring to the immediate east of the Project Site, across De Soto Avenue, and it is therefore, likely to be present in the subsurface of the Project Site. Because the geotechnical studies conducted for the Project Site did not identify the Modelo Formation in any boreholes, the Paleontological Resources Assessment stated that it is likely as much as 75 feet below the ground surface. (Paleontological Resources Assessment, pp. 7-8)

Due to the potentially high paleontological sensitivity of the sediments in the subsurface of the Project Site, the Project has a high potential to disturb unique paleontological resources, which could result in a potentially significant impact. However, as concluded in the WC2035 Plan FEIR, the implementation of WC-CUL-6 and WC-CUL-4 would ensure that the Project's potential impact on unique paleontological resources would be less than significant.

Therefore, with the implementation of Mitigation Measure WC-CUL-6 and WC-CUL-4, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. As such, this impact would be less than significant and was adequately addressed in the WC2035 Plan FEIR.

(d) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant with Mitigation Incorporated. The WC2035 Plan FEIR concluded that there are no known formal cemeteries within the WC2035 Plan area. However, construction activities associated with the implementation of individual projects could result in disturbance of human remains, including those interred outside of formal cemeteries. Because no known archaeological sites are present in the WC2035 Plan area, and the area is underlain by disturbed soils, the presence of human remains is a remote possibility. The remote possibility for this potentially significant impact would be reduced to a less than significant level with the implementation of Mitigation Measure WC-CUL-5 in the WC2035 Plan FEIR, which requires compliance with Sections 5097 and 7050.5 of the California Health and Safety Code in the event that potential human remains of Native American origin are discovered during ground-disturbing activities, and Mitigation Measure WC-CUL-4, which requires the construction contractor to verify that work is halted if cultural resources are discovered during construction activities. (WC2035 Plan DEIR, pp. 4.4-11-12, WC2035 Plan FEIR, pp. V-13-4). Furthermore, Section 15064.5(e) of the State CEQA Guidelines includes additional and overlapping steps that must be taken in the event of the accidental discovery or recognition of Native American human remains.

This analysis is fully applicable to the Project. The Project would be subject to Mitigation Measures WC-CUL-5 and WC-CUL-4 to ensure that any potential impact on human remains would be less than significant.

Therefore, with the implementation of Mitigation Measures WC-CUL-5 and WC-CUL-4, the Project would not disturb any human remains, including those interred outside of formal cemeteries. As such, this impact would be less than significant and was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following mitigation measures from the WC2035 Plan FEIR are recommended for the Project to reduce potentially significant impacts related to cultural resources (these mitigation measures have been non-substantively modified to apply specifically to the Project):

CUL-3: Archaeological monitoring by a qualified archaeologist, of grading of subsurface materials not previously disturbed, shall be undertaken. If buried cultural resources are discovered during ground-disturbing activities, work will stop in that area and within 100 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures. If during cultural resources monitoring the qualified archaeologist determines that the sediments being excavated are previously disturbed or unlikely to contain significant cultural materials, the qualified archaeologist can specify that monitoring be reduced or eliminated will verify that work is halted until appropriate site-specific treatment measures are implemented.

CUL-4: If cultural resources are discovered during construction activities, the Project's construction contractor will verify that work is halted until appropriate site-specific treatment measures are Implemented.

[The end of the sentence was inadvertently omitted in Mitigation Measure WC-CUL-4 in the WC2035 Plan FEIR, so the remainder of that sentence below was completed with text from the equivalent WC2035 Plan DEIR mitigation measure (WC2035 Plan DEIR, p. 4.4-13, WC2035 Plan FEIR, p. V-13).]

CUL-5: If human remains of Native American origin are discovered during ground-disturbing activities on the Project Site, the Project will comply with State laws relating to the disposition of Native American burials that fall within the jurisdiction of the California Native American Heritage Commission (Public Resources Code Section 5097). According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the

coroner must contact the California Native American Heritage Commission to determine the most likely descendent(s). The most likely descendent shall determine the most appropriate means of treating the human remains and any associated grave artifacts, and shall oversee disposition of the human remains and associated artifacts by the project archaeologists.

CUL-6: A qualified paleontological monitor shall monitor excavation activities below previously disturbed materials for the Project on the Project Site. The qualified paleontological monitor shall retain the option to reduce monitoring with respect to any project phase if, in his/her professional opinion, potentially fossiliferous units, are not found to be present or, if present, are determined by qualified paleontological personnel to have low potential to contain fossil resources.

6. Geology and Soils

WC2035 Plan FEIR Findings

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) stated that the WC2035 Plan area (which includes the Project Site) is located within the seismically active Southern California region. It identified numerous faults recognized as active (Holocene displacement) or potentially active (Quaternary displacement) by the California Geologic Survey and the U.S. Geological Survey within a 100-mile radius of the WC2035 Plan area. The WC2035 Plan area is not located within an Alquist-Priolo Earthquake Fault Zone, and therefore the WC2035 Plan FEIR found that potential for fault rupture was considered negligible. (WC2035 Plan DEIR, pp. 4.5-1-4, 12)

The WC2035 Plan FEIR noted, however, that, as with much of Southern California, the WC2035 Plan area could be exposed to ground shaking during a seismic event because there are active faults located in proximity to the WC2035 Plan area that are capable of generating a maximum moment magnitude earthquake of 6.2 or greater. It determined, however, that adherence to the California Building Code (CBC), which requires that structures be constructed in accordance with design parameters that address the seismic nature of the region, would ensure that development under the WC2035 Plan would not expose people to unknown safety issues associated with seismicity (including ground shaking). It therefore concluded seismic impacts (including ground shaking) would be less than significant. (WC2035 Plan DEIR, pp. 4.5-7, 12)

Notwithstanding that the WC2035 Plan FEIR determined that the seismic impact associated with development in the WC2035 Plan area would be less than significant, it recommended several mitigation measures that relate in part to such seismic impacts (as discussed below), presumably to ensure that such impacts associated with individual projects would be less than significant. (WC2035 Plan FEIR, p. V-15)

With regard to liquefaction, seismic hazard maps produced by the State of California and contained within the City's General Plan Safety Element designate the majority of the WC2035 Plan area as being within a potential liquefaction zone. The WC2035 Plan FEIR concluded that development under the WC2035 Plan could result in significant impacts associated with liquefaction.

Accordingly, the WC2035 Plan FEIR included Mitigation Measure WC-GEO-1, which requires project-specific analysis of potential liquefaction impacts as part of a site-specific geotechnical investigation. (WC2035 Plan DEIR, pp. 4.5-7, 9, 13, Figure 4.5-2, WC2035 Plan FEIR, p. V-14)

With regard to subsidence, the WC2035 Plan FEIR stated that the WC2035 Plan area does not include water or oil wells that could result in subsidence, and that any dewatering of individual development sites that may occur to accommodate underground structures such as subterranean parking, are anticipated, with proper engineering, to have negligible affects and not significantly impact adjacent uses. (WC2035 Plan DEIR, p. 4.5-13)

With regard to expansive soils, based on soil descriptions noted in the boring logs reviewed for the WC2035 Plan FEIR, no significant potential for the presence of expansive soils within the near surface was identified. The WC2035 Plan FEIR concluded that the implementation of the WC2035 Plan would have a less than significant impact with respect to expansive soils because site-specific geologic and engineering studies would be required for new development and expansive soils impacts would be addressed through site-specific design. Consistent with that determination, Mitigation Measure WC-GEO-1 required a project-specific geotechnical investigation that addressed site-specific soil conditions, including expansive soils. (WC2035 Plan DEIR, pp. 4.5-8, 13) The WC2035 Plan FEIR included other geotechnical mitigation measures, some of which would further ensure that individual development projects would not have a significant impact with respect to expansive soils. (WC2035 Plan FEIR, pp. V-14-16)

With regard to slope stability, the City's General Plan Safety Plan Element notes that although the southeastern portion of the WC2035 Plan area is located within a hillside area (i.e., Chalk Hills), no landslides have been recorded. For this reason, the WC2035 Plan FEIR concluded that the impact of the WC2035 Plan associated with slope stability would be less than significant. (WC2035 Plan DEIR, pp. 4.5-8-9, 13, Figure 4.5-2)

With regard to sedimentation and erosion, the WC2035 Plan FEIR found that implementation of the WC2035 Plan would result in continued redevelopment of an already urbanized environment, together with continued conveyance of associated urban runoff to existing stormwater conveyance facilities, thereby reducing the potential for erosion within the WC2035 Plan area. As such, the WC2035 Plan FEIR concluded that implementation of the WC2035 Plan would result in less than significant impacts related to sedimentation and erosion. Nonetheless, the WC2035 Plan FEIR recommended several mitigation measures that relate to sedimentation and erosion impacts, presumably to ensure that any such impacts associated with individual projects would be less than significant. Those mitigation measures require implementation of an erosion control plan with appropriate BMPs during the rainy season, appropriate erosion control and drainage devices, directing water away from temporary excavation slopes during the rainy season, and preparation of a site-specific Stormwater Pollution Prevention Plan (SWPPP). (WC2035 Plan DEIR, p. 4.5-13, WC2035 Plan FEIR, pp. V-15-16)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended 12 mitigation measures, designated as WC-GEO-1 through WC-GEO-12, with respect to potentially significant impacts or less than significant impacts related to geology and soils (WC2035 Plan FEIR, pp. V-14-16). Of those mitigation measures, the following are potentially applicable to the Project:

WC-GEO-1: The City shall require that individual projects prepare detailed geotechnical investigations that address site-specific geologic constraints of the site including soil conditions (including liquefaction and expansive soils) and stability. The study shall include recommendations related to erosion control and other site-specific conditions including seismicity for construction of individual projects.

WC-GEO-2: The City shall require that individual projects be constructed in compliance with the Los Angeles Municipal Code and California Building Code and other applicable regulations.

WC-GEO-3: Unless otherwise specified by the City of Los Angeles, the City shall require that individual projects demonstrate compliance with specific recommendations for grading, foundation design, retaining wall design, temporary excavations, slabs on grade, site drainage, asphalt concrete pavement and interlocking pavers, design review, construction monitoring and geotechnical testing as identified in a site-specific geotechnical study, to the satisfaction of the City of Los Angeles Department of Building and Safety, as conditions to issuance of any grading and building permits.

WC-GEO-4: The City shall require that individual projects comply with the following Department of Building and Safety requirements (if not already covered by mitigation measure GEO-3), prior to issuance of a grading permit for the project:

- Prior to the issuance of a grading permit by the Department of Building and Safety, the consulting geologist and soils engineer for each project shall review and approve project grading plans. This approval shall be conferred by signature on the plans which clearly indicate the geologist and/or soils engineer have reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in the report.
- Prior to the commencement of grading activities, a qualified geotechnical engineer and engineering geologist shall be employed on each project for the purpose of observing earthwork procedures and testing fills for conformance to the recommendations of the City Engineer, approved grading plans, applicable grading codes, and the geotechnical report approved to the satisfaction of the Department of Building and Safety.
- On each project, during construction, all grading shall be carefully observed, mapped and tested by the project engineer. All grading shall be performed under the supervision of a licensed engineering

geologist and/or soils engineer in accordance with applicable provisions of the Los Angeles Municipal Code and California Building Code and to the satisfaction of the City Engineer and the Superintendent of Building and Safety.

- Any recommendations prepared by the consulting geologist and/or soils engineer on each project for correction of geologic hazards, if any, encountered during grading shall be submitted to the Department of Building and Safety for approval prior to issuance of a Certificate of Occupancy for the project.
- Grading and excavation activities shall be undertaken in compliance with all relevant requirements of the California Division of Industrial safety, the Occupational Safety and Health Act of 1970 and the Construction Safety Act.

WC-GEO-5: The City shall require that individual projects conform to applicable criteria set forth in the Recommended Lateral Force Requirements and Commentary by the Structural Engineers Association of California.

WC-GEO-6: The City shall require that individual projects within the WCRCCSP *[sic]* area shall be designed to conform to the City of Los Angeles Seismic Safety Plan and additional seismic safety requirements not encompassed by compliance with the Los Angeles Municipal Code and California Building Code and Grading Ordinance as may be identified by the Department of Building and Safety prior to Plan Check approval on each building.

WC-GEO-7: The City shall require that the structural design of each building within the WCRCCSP *[sic]* area shall comply with the seismic standards of the most recent applicable California Building Code according to the seismic zone and construction type.

WC-GEO-8: The City shall require that on each project site, during inclement periods of the year, when rain is threatening (between November 1 and April 15 per the Los Angeles Building Code, Sec. 7002.), an erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Los Angeles Department of Building and Safety to minimize potential erosion during construction. The erosion control plan shall be a condition to issuance of any grading permit.

WC-GEO-9: The City shall require appropriate erosion control and drainage devices to be incorporated to the satisfaction of the Department of Building and Safety in to every project within the WCRCCSP area. Such measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures.

WC-GEO-10: The City shall require that if temporary excavation slopes are to be maintained during the rainy season, all drainage shall be directed away from the top of the slope. No water shall be allowed to flow uncontrolled over the face of any temporary or permanent slope.

WC-GEO-11: The City shall require that on each project site provisions are made for adequate surface drainage away from areas of excavation as well as protection of excavated areas from flooding. The grading contractor shall control surface water and the transportation of silt and sediment.

WC-GEO-12: The City shall require that all projects within the WCRCCSP area shall comply with National Pollutant Discharge Elimination System (NPDES) permit requirements, including preparation of Storm Water Pollution Prevention Plans. As part of each SWPPP, Best Management Practices would be identified for construction to reduce soil erosion and pollutant levels to the maximum extent possible.

Preliminary Geotechnical Investigations

The Project's impacts associated with geology and soils were analyzed in a site-specific preliminary geotechnical investigation prepared by GeoSoils Consultants Inc., titled *Geologic and Geotechnical Report, Proposed Multi-story Buildings with Subterranean Parking, Lots 1 through 12, Tract 42011, Woodland Hills, California*, dated April 24, 2017 (GeoSoils, 2017). The City of Los Angeles Department of Building and Safety issued a *Soils Report Review Letter*, dated May 16, 2017, requesting updated and additional information (City, 2017). In response, GeoSoils prepared a subsequent clarifying letter, *Response to City of Los Angeles Department of Building and Safety Grading Division Soils Report Correction Letter dated May 16, 2017, Log No. 97858, Regarding the Proposed Multi-story Buildings with Subterranean Parking, Lots 1 through 12, Tract 42011, Woodland Hills, California*, August 26, 2019, which further refined their findings for the Project geologic setting and impacts (GeoSoils, 2019). The response letter provided updated information and responded to each of the 14 City comments. Combined, the two GeoSoils investigations comprise the preliminary geotechnical investigation. The two GeoSoils reports and the City comment letter are included in Appendix E to this Tiered IS.

It is noted that the geotechnical investigations were based on the preliminary design information provided to GeoSoils available at that time. While the available design information was sufficient to proceed with a preliminary geotechnical investigation, some design information has not yet been developed. For example, design information regarding the specific building loads for each building are being developed, and GeoSoils made certain assumption and anticipated that deepened foundations would be required. When updated building loads information is available, along with other additional final design information updates, if any, a final geotechnical investigation package would be completed and submitted to the City with respect to each phase of the Project for its review and approval. This submittal is required as part of the building permit process and is consistent with Mitigation Measures WC-GEO-1 through WC-GEO-7. As set forth in Attachment A in this Tiered IS, the Project includes 430,000 cubic yards (cy) of cut and 20,000 cy of fill, which will therefore require the export of approximately 410,000 cy of soil from the Project Site on a phased basis. Details regarding the grading quantities and the amount of soil to be exported by phase are as follows:

- Phase 1 – 14,000 cy of cut, 8,000 cy of fill, and 6,000 cy of export

- Phase 2 – 31,000 cy of cut, 3,000 cy of fill, and 28,000 cy of export
- Phase 3 – 107,000 cy of cut, 2,000 cy of fill, and 105,000 cy of export
- Phase 4 – 39,000 cy of cut, 1,000 cy of fill, and 38,000 cy of export
- Phase 5 – 42,000 cy of cut, 2,000 cy of fill, and 40,000 cy of export
- Phase 6 – 49,000 cy of cut, 2,000 cy of fill, and 47,000 cy of export
- Phase 7 – 60,000 cy of cut, 1,000 cy of fill, and 59,000 cy of export
- Phase 8 – 88,000 cy of cut, 1,000 cy of fill, and 87,000 cy of export.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts related to geology and soils, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

Would the project:

(a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, the WC2035 Plan area (which includes the Project Site) is not located within an Alquist-Priolo Earthquake Fault Zone, and therefore the potential for fault rupture was considered negligible (WC2035 Plan DEIR, pp. 4.5-12-13). This was confirmed by the project-specific preliminary geotechnical investigation prepared for the Project, which reiterated that the Project Site is not located in an Alquist-Priolo Earthquake Fault Zone and that there are no known faults on the Project Site (GeoSoils, 2017, pp. 6-7). As such, the Project would have a less than significant impact associated with the exposure of people or structures to rupture of a known earthquake fault and this impact was adequately addressed in the WC2035 Plan FEIR.

(ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental condition?

Less Than Significant with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR, the WC2035 Plan area is located in the seismically active Southern California region, and intense ground shaking is to be expected as a result of proximity to known active faults in proximity to the WC2035 Plan area. These faults are capable of generating a maximum moment magnitude

earthquake of 6.2 or greater, and movement along these faults could generate an earthquake capable of causing considerable damage to buildings and infrastructure located within the WC2035 Plan area. The CBC requires that structures built in California be constructed to address the seismic nature of the region. As such, the WC2035 Plan FEIR determined that development in the WC2035 Plan area would not expose people to unknown safety issues associated with seismicity (including ground shaking). Nonetheless, it recommended several mitigation measures that relate in part to strong seismic ground shaking impacts, presumably to ensure that any such impacts associated with individual projects would be less than significant. (WC2035 Plan DEIR, pp. 4.5-12-13, WC2035 Plan FEIR, p. V-15)

This analysis applies fully to the Project and Project Site. The preliminary geotechnical investigation confirmed that the Project Site has experienced earthquake-induced ground shaking in the past and is expected to experience further ground shaking in the future, as there are active faults within proximity to the Project Site that could cause moderate to intense shaking during the lifetime of the Project (GeoSoils, 2017, p. 6). However, consistent with the WC2035 Plan FEIR, and as stated in the preliminary geotechnical investigation (GeoSoils, 2017, pp. 10-11), the Project would be designed and constructed in conformance with CBC seismic requirements, and would implement Mitigation Measures WC-GEO-1 through WC-GEO-7 to address impacts related to strong seismic ground shaking, and therefore this impact would be less than significant.

For these reasons, with the implementation of Mitigation Measures WC-GEO-1 through WC-GEO-7, the Project would have a less than significant impact associated with the exposure of people or structures to strong seismic ground shaking and this impact was adequately addressed in the WC2035 Plan FEIR.

(iii) Seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of the existing environmental condition?

Less Than Significant Impact with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR, the WC2035 Plan area is located on soil that has high potential for liquefaction and lateral spreading, so that development under the WC2035 Plan could result in significant impacts associated with liquefaction and lateral spreading. Accordingly, the WC2035 Plan FEIR included Mitigation Measure WC-GEO-1, which requires project-specific analysis of potential liquefaction and lateral spreading impacts as part of a site-specific geotechnical investigation. (WC2035 Plan DEIR, pp. 4.5-7, 9, 13, Figure 4.5-2)

This analysis applies with full force to the Project and Project Site. The preliminary geotechnical investigation confirmed that some layers of soil on the Project Site are subject to liquefaction and lateral spreading, although the liquefaction and lateral spreading potential of layers of sandy and clayey silts throughout the Project Site was deemed very low (GeoSoils, 2017, pp. 7-9, 12; GeoSoils, 2019, p. 2). However, with implementation of site-specific design and construction recommendations, this impact would be reduced to a less than significant level. However, with the implementation of Mitigation Measures WC-GEO-1 through WC-GEO-7, the Project would have a less than significant impact with respect to strong seismic-related ground failure, including

liquefaction and lateral spreading, and this impact was adequately addressed in the WC2035 Plan FEIR.

In addition, seismic shaking can also cause seismically induced settlement (GeoSoils, 2017, Appendix C; GeoSoils, 2019, p.4, 8, and Appendix A). The preliminary geotechnical investigation confirmed that the area is susceptible to seismically induced settlement and anticipated that deepened foundations would be required, pending the receipt of building loads information. As previously stated, Mitigation Measures WC-GEO-1, WC-GEO-2 and WC-GEO-6 would require the final geotechnical design evaluated for seismically induced ground failures, including settlement, which would result in a less than significant impact.

(iv) Landslides, caused in whole or in part by the project's exacerbation of the existing environmental condition?

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, the southeastern portion of the WC2035 Plan area is located within a hillside area, but there have been no recorded landslides in that area (WC2035 Plan DEIR, p. 4.5-13). The Project Site itself is not located within a hillside area. The preliminary geotechnical investigation confirmed that there are no slopes on the Project Site to warrant landslide hazards (GeoSoils, 2017, p. 6). Therefore, the Project would result in a less than significant impact with respect to the exposure of people or structures to landslides, and this impact was adequately addressed in the WC2035 Plan FEIR.

(b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, development within the WC2035 Plan area would include a continuation of the construction of urban land uses and associated urban runoff to existing stormwater conveyance facilities. This would reduce the potential for erosion to occur on individual development sites, and this impact was considered to be less than significant.

Nonetheless, the WC2035 Plan FEIR recommended several mitigation measures that relate to sedimentation and erosion impacts, presumably to ensure that any such impacts associated with individual projects would be less than significant. Those mitigation measures, which include Mitigation Measures WC-GEO-9 through WC-GEO-12, require the implementation of an erosion control plan with appropriate BMPs during the rainy season, appropriate erosion control and drainage devises, directing water away from temporary excavation slopes during the rainy season, and preparation of a site-specific Stormwater Pollution Prevention Plan (SWPPP). (WC2035 Plan DEIR, p. 4.5-13; WC2035 Plan FEIR, p. V -15-16)

This analysis adequately addresses the Project's impact on substantial erosion or the loss of topsoil. The implementation of the Mitigation Measures WC-GEO-9 through WC-GEO-12 would further ensure that the development of the Project would not cause any material erosion or loss of topsoil.

Therefore, the implementation of Mitigation Measures WC-GEO-9 through WC-GEO-12 would further ensure that the Project would have a less than significant impact with respect to substantial erosion and loss of topsoil, and this issue was adequately addressed in the WC2035 Plan FEIR.

(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 caused in whole or in part by the project's exacerbation of the existing environmental condition?

Less Than Significant Impact with Mitigation Incorporated. As previously discussed, the Project's impacts on site stability related to landslides (discussed in Section 6(a)(iv), above), liquefaction and lateral spreading (discussed in Section 6(a)(iii) above) and collapse (included with settlement discussion) have been adequately addressed in the WC2035 Plan FEIR and further addressed in the preliminary geotechnical investigation. To the extent required, those impacts would be appropriately mitigated by applicable Mitigation Measures WC-GEO-1 through WC-GEO-7 in the WC2035 Plan FEIR. In addition, the Project would be designed and constructed in compliance with all of the site-specific geotechnical engineering recommendations provided in the preliminary geotechnical investigation (GeoSoils, 2017, pp. 10-24).

With regard to subsidence, the WC2035 Plan FEIR stated that the WC2035 Plan area does not include water or oil production wells that would result in subsidence, and that any dewatering of individual development sites that may occur to accommodate subterranean parking or other underground structures were anticipated, with proper engineering, to have negligible subsidence effects and not significantly impact adjacent uses. (WC2035 Plan DEIR, p. 4.5-13)

This analysis is fully applicable to the Project's impact on subsidence. The Project Site does not include water or oil production wells that would result in subsidence, and any dewatering required with respect subterranean parking structures would be properly engineered in accordance with applicable regulations to ensure that any subsidence effects would be negligible. Therefore, the Project would have a less than significant impact with respect to subsidence. In addition, the implementation of Mitigation Measures WC-GEO-1 and WC-GEO-3 would further ensure that the Project's subsidence impact would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

(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 caused in whole or in part by the project exacerbating the expansive soil conditions?

[Note that the CBC, based on the International Building Code and the now out-of-date Uniform Building Code, no longer includes a Table 18-1-B. Instead, Section 1803.5.3 of the CBC describes the criteria for analyzing expansive soils.]

Less Than Significant Impact with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR, a quantitative assessment of the expansion potential of soils was not performed for the entirety of the WC2035 Plan area. The WC2035 Plan FEIR assumed that preparation of site-specific geologic and engineering studies would be required for individual developments, and any expansive soil impacts would be addressed through site-specific design. (WC2035 Plan DEIR, p.

4.5-13) Consistent with that determination, Mitigation Measure WC-GEO-1 required a project-specific geotechnical investigation that addressed site-specific soil conditions, including expansive soils. (WC2035 Plan DEIR, pp. 4.5-8, 4.5-13) The WC2035 Plan FEIR included other geotechnical mitigation measures, some of which would further ensure that individual development projects would not have a significant impact with respect to expansive soils. (WC2035 Plan FEIR, pp. V-14-16)

Consistent with Mitigation Measure WC-GEO-1, the preliminary geotechnical investigation for the Project included the analysis of expansive soils as part of its evaluation, and test results indicated that expansive soils are not considered a hazard to the Project. (GeoSoils, 2017, pp. 5-6 and Appendix B; GeoSoils, 2019, p. 4)

Onsite materials were collected during exploration for laboratory testing of expansion. The expansion tests were performed according to ASTM-D4829-11. The test results indicated an expansion index of 51 (medium expansion). Therefore, soil expansion is not considered a hazard on the Project Site. However, the geotechnical consultant recommended that (1) all foundations should be designed for expansive soil conditions and adequate landscape drainage to maintain the soil at a fairly consistent moisture content and (2) positive drainage be implemented such that runoff surface water can outlet away from onsite structures. (GeoSoils, 2017, pp. 12-18.) Consistent with those recommendations, structural foundations would be designed for expansive soil conditions, and adequate landscape drainage would be provided to maintain the soil at a fairly consistent moisture content. In addition, positive drainage would be implemented such that runoff surface water can outlet away from onsite structures.

To further ensure these issues are addressed, the Project would be subject to compliance with Mitigation Measures WC-GEO-1 through WC-GEO-7, which would ensure that potential instability of Project Site soils due to expansive soil conditions or other geotechnical issues would be minimized through engineering controls and compliance with the CBC and other applicable regulations. Therefore, with the implementation of the recommendations in the preliminary geotechnical investigation and compliance with Mitigation Measures WC-GEO-1 through WC-GEO-7, the Project would have a less than significant impact with respect to expansive soils.

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

No Impact. The WC2035 Plan area (which includes the Project Site) is connected to the municipal sanitary sewer system and does not require the use of septic tanks. Likewise, the Project would not utilize septic tanks and would connect to the municipal sanitary sewer system. As such, there would be no impact in this regard.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following 13 mitigation measures from the WC2035 Plan FEIR are recommended for the Project to further reduce the less than significant impacts related to

geology and soils (these mitigation measures have been non-substantively modified to apply specifically to the Project):

GEO-1: The Applicant is required to prepare detailed geotechnical investigations that address site-specific geologic constraints of the site including soil conditions (including liquefaction and expansive soils) and stability. The study shall include recommendations related to erosion control and other site-specific conditions including seismicity for construction of individual projects.

GEO-2: The Project shall be constructed in compliance with the Los Angeles Municipal Code and California Building Code and other applicable regulations.

GEO-3: Unless otherwise specified by the City, for each phase of the Project, the Applicant shall demonstrate compliance with specific recommendations for grading, foundation design, retaining wall design, temporary excavations, slabs on grade, site drainage, asphalt concrete pavement and interlocking pavers, design review, construction monitoring and geotechnical testing as identified in a site-specific geotechnical study, to the satisfaction of the Department of Building and Safety, as conditions to issuance of any grading and building permits with respect to such phase.

GEO-4: For each phase of the Project, the Applicant shall comply with the following Department of Building and Safety requirements (if not already covered by mitigation measure GEO-3), prior to issuance of a grading permit for such phase of the Project:

- Prior to the issuance of a grading permit by the Department of Building and Safety for each phase of the Project, the consulting geologist and soils engineer for the Project shall review and approve project grading plans with respect to such phase. This approval shall be conferred by signature on the plans which clearly indicate the geologist and/or soils engineer have reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in the report.
- Prior to the commencement of grading activities for each phase of the Project, a qualified geotechnical engineer and engineering geologist shall be employed with respect to such phase for the purpose of observing earthwork procedures and testing fills for conformance to the recommendations of the City Engineer, approved grading plans, applicable grading codes, and the geotechnical report approved to the satisfaction of the Department of Building and Safety.
- During construction of each phase of the Project, all grading shall be carefully observed, mapped and tested by the project engineer. All grading shall be performed under the supervision of a licensed engineering geologist and/or soils engineer in accordance with applicable provisions of the Los Angeles Municipal Code and

California Building Code and to the satisfaction of the City Engineer and the Department of Building and Safety.

- Any recommendations prepared by the consulting geologist and/or soils engineer for each phase of the Project for correction of geologic hazards, if any, encountered during grading shall be submitted to the Department of Building and Safety for approval prior to issuance of a Certificate of Occupancy for the applicable phase of the Project.
- Grading and excavation activities shall be undertaken in compliance with all relevant requirements of the California Division of Industrial safety, the Occupational Safety and Health Act of 1970 and the Construction Safety Act.

GEO-5: The Project shall conform to applicable criteria set forth in the Recommended Lateral Force Requirements and Commentary by the Structural Engineers Association of California.

GEO-6: Each phase of the Project shall be designed to conform to the City of Los Angeles Seismic Safety Plan and additional seismic safety requirements not encompassed by compliance with the Los Angeles Municipal Code and California Building Code and Grading Ordinance as may be identified by the Department of Building and Safety prior to Plan Check approval on each building.

GEO-7: The structural design of each project building shall comply with the seismic standards of the most recent applicable California Building Code according to the seismic zone and construction type.

GEO-8: For each phase of the Project, the Applicant shall ensure that during inclement periods of the year, when rain is threatening (between November 1 and April 15 per the Los Angeles Building Code, Sec. 7002.), an erosion control plan that identifies BMPs shall be implemented on the Project Site to the satisfaction of the Department of Building and Safety to minimize potential erosion during construction. The erosion control plan shall be a condition to issuance of any grading permit for the applicable phase of the Project.

GEO-9: The Applicant shall ensure that appropriate erosion control and drainage devices are incorporated to the satisfaction of the Department of Building and Safety. Such measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures.

GEO-10: The Applicant shall ensure that if temporary excavation slopes are to be maintained during the rainy season, all drainage shall be directed away from the top of the slope. No water shall be allowed to flow uncontrolled over the face of any temporary or permanent slope.

GEO-11: The Applicant shall ensure that provisions are made for adequate surface drainage away from areas of excavation, as well as protection of excavated

areas from flooding, on the Project Site. The grading contractor shall control surface water and the transportation of silt and sediment.

GEO-12: For each phase of the Project, the Applicant shall comply with National Pollutant Discharge Elimination System (NPDES) permit requirements, including preparation of Storm Water Pollution Prevention Plans (SWPPP). As part of the SWPPP for each phase of the Project, Best Management Practices (BMPs) would be identified for construction to reduce soil erosion and pollutant levels to the maximum extent possible.

7. Greenhouse Gas Emissions

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR evaluated the greenhouse gas (GHG) emissions associated with the buildout under the WC2035 Plan, based on the California Air Resources Board's (CARB) interim tiered threshold. At the time the WC2035 Plan FEIR was prepared, the South Coast Air Quality Management District (SCAQMD) had not established any GHG significance thresholds for development projects and had formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds. (WC2035 Plan DEIR, pp. 4.2-24, 36)

The impact analysis in the WC2035 Plan FEIR discussed the WC2035 Plan's consistency with the City's 2007 climate action plan, titled GreenLA, and a related implementing plan titled ClimateLA. According to the WC2035 Plan FEIR, ClimateLA presented the existing GHG inventory for the City, including enforceable GHG reduction requirements, provided mechanisms to monitor and evaluate progress, and included mechanisms that allow the plan to be revised in order to meet targets. By 2030, ClimateLA aimed to reduce GHG emissions by 35 percent from 1990 levels, which were estimated to be approximately 54.1 million metric tons. Accordingly, the WC2035 Plan FEIR stated that the City would need to lower annual GHG emissions to approximately 35.1 million metric tons per year by 2030. (WC2035 Plan DEIR, p. 4.2-36)

Construction

With regard to construction, the WC2035 Plan FEIR discussed that Climate LA set goals of reducing or recycling 70 percent of trash (including construction waste) by 2015. It also stated that the WC2035 Plan would help promote this goal through policies that encourage sustainability and would not impede implementation of City recycling measures. (WC2035 Plan DEIR, pp. 4.2-36-37)

The WC2035 Plan FEIR noted that, in the absence of adequate construction schedules or information regarding project locations and schedules, construction emissions for individual projects could not be quantified with accuracy. Nonetheless, it concluded that there was sufficient data available to determine the general types of construction that might occur (e.g., residential and non-residential) and associated square footage. Accordingly, the WC2035 Plan FEIR provided an estimate of average annual construction related GHG emissions assuming individual projects would be distributed evenly over the planning horizon of the WC2035 Plan. As was done in the WC2035 Plan FEIR's analysis of air quality construction criteria pollutants, based on the

assumption that two projects would be under construction each year, it estimated that the average annual CO_2 equivalent emissions would be 1,130 metric tons. The WC2035 Plan FEIR anticipated that GHG emissions would be lower during years of economic slowdown and considerably higher during years of an economic peak. It also expected that GHG emissions associated with construction activities that occurred later in the planning horizon of the WC2035 Plan would be reduced as a result of emission controls on construction equipment. (WC2035 Plan DEIR, p. 4.2-37)

The WC2035 Plan FEIR concluded that, even with the implementation of the recommended mitigation measures with respect to GHG-related construction emissions (which include Mitigation Measures WC-AQ-4 through WC-AQ-8, as further discussed below), the WC2035 Plan FEIR determined that construction emissions would significantly contribute to GHG emissions and global warming, and therefore the construction impact related to GHG emission would be significant and unavoidable (WC2035 Plan DEIR, p. 4.2-43).

Operations

With regard to operational impacts, the WC2035 Plan FEIR discussed ways in which ClimateLA promoted the reduction of GHG emissions associated with energy usage, water, transportation, waste and open space.

To reduce emissions from energy usage, ClimateLA aimed to increase the amount of renewable energy provided by the Los Angeles Department of Water and Power (LADWP), present green building policies to guide private sector development, reduce energy consumed by City facilities and utilize solar heating where applicable, and help citizens to use less energy. (WC2035 Plan DEIR, p. 4.2-37)

Regarding water, ClimateLA set the following goals: meet all additional demand for water resulting from growth through water conservation and recycling; reduce per capita water consumption by 20 percent; and implement the City's water and wastewater integrated resources plan that will increase conservation, and maximize the capture and reuse of storm water. (WC2035 Plan DEIR, p. 4.2-37)

With regard to transportation, the WC2035 Plan FEIR stated that ClimateLA primarily focused on reducing emissions from City-owned vehicles. However, it also noted that ClimateLA included measures to help reduce GHG emissions from private vehicle use. It also discussed that the WC2035 Plan encouraged growth adjacent to transit and proposed a balance of uses designed to encourage pedestrian and bicycling, as well as transit use as opposed to cars. (WC2035 Plan DEIR, p. 4.2-43)

Regarding waste, it stated that ClimateLA set the goal of reducing or recycling 70 percent of trash by 2015. Finally, with regard to open space and greening, the WC2035 Plan stated that ClimateLA sets the following goals: create 35 new parks; revitalize the Los Angeles River to create open space opportunities; plant one million trees throughout the City; identify opportunities to "daylight" streams; identify promising locations for stormwater infiltration to recharge groundwater aquifers;

and collaborate with schools to create more parks in neighborhoods. The WC2035 Plan FEIR stated that the WC2035 Plan would help promote such measures. The WC2035 Plan FEIR also recommended Mitigation Measure WC-AQ-22, which requires all project landscaping to be drought tolerant to reduce water consumption and provide passive solar benefits. (WC2035 Plan DEIR, p. 4.2-38, WC2035 Plan FEIR, p. V-11)

The WC2035 Plan FEIR estimated the annual operational GHG emissions under existing conditions and future (2035) conditions with the implementation of the WC2035 Plan. As shown in Table 4.2-9 in the WC2035 Plan DEIR, growth under the WC2035 Plan would result in an annual increase of approximately 341,000 metric tons of CO_2 equivalent emissions. It noted that the estimated future emissions from area sources, electricity consumption, and landfills, as shown in Table 4.2-9, did not account for reductions that would occur under the ClimateLA policies described above. This was because (1) such reductions were highly uncertain, as most policies would only "encourage" or "promote" the measures, and (2) the reductions that could be achieved by the measures were difficult to quantify without specific data. In addition, the WC2035 Plan FEIR stated that a large portion of the increase in operational GHG emissions was a direct result of increased VMT. Although implementation of the WC2035 Plan would result in GHG reductions due to the transportation improvement and mitigation program, such regional reductions in VMT could not be quantified. (WC2035 Plan DEIR, pp. 4.2-38-39)

In addition, the WC2035 Plan FEIR discussed that future daily VMT on local roadways under WC2035 Plan buildout would be about 6 percent higher than anticipated under the no project condition in 2035. It also stated that daily VMT on local roadways was expected to increase approximately 11.6 percent from existing conditions. In the absence of information regarding where growth would be reduced in the City, the WC2035 Plan FEIR concluded that increases in GHG emissions would have the potential to interfere with the implementation of the ClimateLA plan, and subsequently could interfere with the State's ability to meet its goals under AB 32. Therefore, it determined that the GHG-related operational air quality impacts from the WC2035 Plan implementation were considered significant and unavoidable. (WC2035 Plan DEIR, pp. 4.2-39, 43)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended 22 mitigation measures, designated as WC-AQ-1 through WC-AC-22, with respect to potentially significant impacts and less than significant impacts related to air quality and GHG emissions (WC2035 Plan FEIR, pp. V-5-11). Mitigation measures set forth in the WC2035 Plan FEIR that are not applicable to the Project are not included below. These include Mitigation Measures WC-AQ-1 through WC-AQ-3 and WC-AQ-9 through WC-AQ-16, which do not affect GHG emissions or reductions. WC-AQ-17 through WC-AQ-21 do not apply to the Project because they are obligations of the City, not a private developer. The WC2035 Plan FEIR also recommended five water conservation measures, designated as WC-U-4 through WC-U-8 that would reduce water supply and conveyance impacts to less than significant (WC2035 Plan FEIR, pp. V-5-11) and an energy conservation mitigation measure, designated as WC-U-14, with respect to less than significant impacts related to electrical demand. (WC2035 Plan DEIR, pp. 4.13-37-38) These water and energy conservation measures would also contribute to reductions in GHG

emissions from the energy used to supply and convey water and the fossil fuels used to produce electricity.

The following 12 mitigation measures are applicable to the Project with respect to GHG-related emissions:

WC-AQ-4: The City shall require that developers provide rideshare and transit incentives to construction personnel.

WC-AQ-5: The City shall require that developers configure construction parking to minimize interference with traffic lanes.

WC-AQ-6: The City shall require that developers and City Departments minimize the obstruction of through-traffic in the vicinity of construction sites.

WC-AQ-7: The City shall require that developers and City Departments use flag people during construction to guide traffic properly.

WC-AQ-8: The City shall require that construction activities that could affect roadways be scheduled for off-peak periods.

WC-AQ-22: All landscaping in public and private projects shall be required to be drought tolerant to reduce water consumption and provide passive solar benefits.

WC-U-4: The City shall require that each applicant implement water conservation measures in new development that shall include but not be limited to the following:

- Installation of high-efficiency toilets (1.28 gallons per flush or less, includes dual flush
- High-efficiency urinals (0.125 gallons per flush or less, includes waterless)
- Restroom faucet flow rate of 1.5 gallons per minute or less
- Public restroom faucet flow rate of 0.5 gallons per minute or less and self-closing
- Showerhead flow rate of 2.0 gallons per minute or less
- Limit of one showerhead per shower stall
- High efficiency clothes washers (water factor of 4.0 or less)
- High efficiency dishwashers (Energy Star rated)
- Domestic water heating system located in close proximity to point(s) of use, as feasible
- Use of tankless and on-demand water heaters as feasible

- Cooling towers must be operated at a minimum of 5.5 cycles of concentration
- Install on-site water recycling as feasible
- Use of recycled water (if available) for appropriate end uses (irrigation, cooling towers, sanitary)
- Single pass cooling shall be prohibited (e.g. any vacuum pumps or ice machines)
- Irrigation shall include:
  - Weather-based irrigation controller with rain shutoff
  - Flow sensor and master valve shutoff (for large landscaped areas)
  - Matched precipitation (flow) rates for sprinkler heads
  - Drip/microspray/subsurface irrigation where appropriate
  - Minimum irrigation system distribution uniformity of 75%
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
  - Use of landscape contouring to minimize precipitation runoff.

WC-U-5: The City shall require that prior to the issuance of a building permit, each applicant shall consult with LADWP to identify feasible and reasonable measures to reduce water consumption, including, but not limited to, systems to use reclaimed water for landscaping (should reclaimed water become available in Warner Center), drip irrigation, re-circulating hot water systems, water conserving landscape techniques (such as mulching, installation of drip irrigation systems, landscape design to group plants of similar water demand, soil moisture sensors, automatic irrigation systems, clustered landscaped areas to maximize the efficiency of the irrigation system), water conserving kitchen and bathroom fixtures and appliances, thermostatically controlled mixing valves for baths and showers, and insulated hot water lines, as per City adopted UBC requirements.

WC-U-6: The City shall require that each project incorporate Phase I of the City of Los Angeles Emergency Water Conservation Plan including prohibiting hose watering of driveways and associated walkways; requiring decorative fountains to use recycled water, and repairing water leaks in a timely manner.

WC-U-7: The City shall require that each project comply with any additional mandatory water use restrictions imposed as a result of drought conditions.

WC-U-8: The City shall require automatic sprinkler systems to be installed to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often

in cooler months and during the rainfall season, so that water is not wasted in excessive landscape irrigation.

WC-U-14: The City shall require that each project, during the design process, consult with the Department of Water and Power, Energy Services Subsection and the Southern California Gas Company, the Commercial, Industrial or Residential Staff Supervisor, regarding possible Energy Conservation Measures for each project.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts related to GHG emissions, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which are set forth in the WC2035 Plan FEIR, are discussed below.

Would the project:

(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction

Significant and Unavoidable Impact. The WC2035 Plan FEIR quantified annual average construction GHG emissions of 1,130 metric tons of carbon dioxide equivalents ($MTCO_2e$) based on the general types of construction that may occur in the WC2035 Plan Area for residential and non-residential development and associated square footage. Notwithstanding the recommended GHG-related Mitigation Measures WC-AQ-4 through WC-AQ-8, the WC2035 Plan FEIR concluded that GHG-relate construction emissions would significantly contribute to GHG emissions and global warming, and therefore construction impacts would be significant and unavoidable. (WC2035 Plan DEIR, pp. 4.2-39, 43)

This analysis adequately addressed the Project's GHG impact with respect to construction emissions. As would be the case with any development project in the WC2035 Plan area, project construction activities would require the temporary use of construction equipment at the Project Site, including loaders, dozers, forklifts, excavators, haul trucks and worker vehicle fuels. As discussed in the WC2035 Plan FEIR, the use of this equipment during the construction of each phase of the Project would generate GHG emissions from equipment and vehicle exhaust. Construction of the Project would comply with applicable federal, State, and local regulations, such as the California Air Resources Board (CARB) existing off-road diesel vehicle regulation that requires the phase-in of cleaner heavy-duty equipment (WC2035 Plan DEIR, pp. 4.2-14).

The WC2035 Plan FEIR reasonably assumed that, on average, two projects of equal size would be under construction in any given year. Consistent with that assumption, the Project would be one of those two projects while any project phase would be under construction. Moreover, the density of the Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially

lower FAR of 2.52:1. This means that the Project would have a reduced construction-related GHG impact as compared to the impact assumed in the WC2035 Plan FEIR in calculating the average annual CO_2 equivalent emission. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's GHG-related construction emissions impact.

In any event, a second-tier CEQA document is not required to re-analyze a significant impact that is not susceptible to being mitigated to a level of insignificance. Cal. Pub. Res. Code § 21068.5; State CEQA Guidelines § 15152(f). The WC2035 Plan FEIR concluded that buildout under the WC2035 Plan would have a significant GHG impact with respect to construction emissions, and that this significant impact could not be mitigated to a level of insignificance and was therefore unavoidable. Accordingly, the Project's construction-related GHG impact was adequately addressed in the WC2035 Plan FEIR.

Operations

Significant and Unavoidable Impact. The WC2035 Plan FEIR quantified annual operational GHG emissions from mobile sources, area sources, electricity usage, natural gas, water and wastewater, and solid waste under existing conditions of 1,799,822 $MTCO_2e$ and under future with buildout conditions (2035) of 2,140,638 $MTCO_2e$. The WC2035 Plan FEIR estimated the net increase in emissions from WC2035 Plan buildout over existing conditions would be 340,817 $MTCO_2e$ per year, of which a large amount of the increase is a direct result of increased vehicle miles traveled (VMT). Even with implementation of operational GHG-related Mitigation Measure WC-AQ-22, water conservation Mitigation Measures WC-U-4 through WC-U-8, energy conservation Mitigation Measure WC-U-14, and ClimateLA measures, the WC2035 Plan FEIR concluded that operational GHG impacts would be significant and unavoidable. (WC2035 Plan DEIR, pp. 4.2-39, 43)

This analysis adequately addressed the Project's GHG impacts with respect to operational emissions. Consistent with the WC2035 Plan FEIR analysis, (1) the Project's mix of residential, work-live, retail, office, restaurant, and hotel uses would result in the emission of GHGs from mobile sources, area sources, electricity usage, natural gas, water and wastewater, and solid waste and (2) the operation of the Project would result in increased local VMT and would likely result in greater GHG emissions compared to the existing uses onsite. The Project's proposed land uses (i.e., residential, work-live, retail, office, restaurant, and hotel uses) and physical and operational characteristics of the Project are consistent with the type development envisioned for the Project Site in the WC2035 Plan and the WC2035 Plan FEIR.

Moreover, the density of the Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced operational GHG impact as compared to the impact assumed in the WC2035 Plan FEIR.

Consistent with the WC2035 Plan FEIR, no feasible mitigation exists that could further reduce operational GHG emissions to a less than significant impact. The GHG emissions generated by

future project residents, visitors, employees and vendors would result from two source types: vehicles and building usage (energy for lighting, HVAC, water, etc.). As shown in the WC2035 Plan DEIR (WC2035 Plan DEIR, p. 4.2-38), mobile sources would emit the majority (approximately 77 percent in 2035) of GHG emissions. The Project VMT already incorporates reduction benefits from the transportation demand management (TDM) program pursuant to Section 7.8 of the WC2035 Plan, mode choice distributions for walking, biking, and transit trip generation for the WC2035 Plan area, pass-by trips (which are trips not originally destined to the Project Site but already on the street network), and internal capture (which are trip reductions from interaction among adjacent land uses such as residents walking to an adjacent land use), as documented in the *Preliminary Driveway Traffic Volume Review, De Soto/Burbank Master Plan Project, Warner Center, California (December 14, 2017)* prepared by Gibson Transportation Consulting and provided as Appendix K to this Tiered IS (Traffic Volume Review). Electric vehicles (EVs) result in lower GHG emissions per mile (from power plants used to produce the electricity to charge EVs) than gasoline or diesel powered vehicles.[4] The Project would include the installation of the conduit and panel capacity to accommodate EV charging stations in compliance with LAMC and CALGreen Code requirements, which is expected to encourage electric vehicle usage by project residents, visitors, employees, and vendors. However, the use of lower emitting vehicles by future project residents, visitors, employees, and vendors cannot be mandated.

The Project will be designed and built to meet applicable energy efficiency standards (CalGreen Code requirements); the current CalGreen Codes (2016) are more stringent than those in place at the time the WC2035 Plan FEIR calculated future GHG emissions, and each triennial update is expected to maintain or increase energy efficiency performance standards, thereby reducing GHGs from building use as compared to those used in the WC2035 Plan FEIR. Mitigation Measure WC-U-14 requires the Project applicant to consult with the Department of Water and Power and the Southern California Gas Company regarding possible Energy Conservation Measures during the design process of the Project. Thus, there are no other feasible economic, legal, social, or technological measures that could reduce GHG emissions from vehicles or building use to a less-than-significant level, consistent with the analysis and conclusion in the WC2035 Plan FEIR.

Moreover, the density of the Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have reduced operational GHG emissions as compared to those used in the WC2035 Plan FEIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's operational GHG impact.

In any event, a second-tier CEQA document is not required to re-analyze a significant impact that is not susceptible to being mitigated to a level of insignificance. Cal. Pub. Res. Code § 21068.5; State CEQA Guidelines § 15152(f). The WC2035 Plan FEIR concluded that buildout under the

[4] U.S. Department of Energy, Alternative Fuels Data Center, Emissions from Hybrid and Plug-In Electric Vehicles, https://www.afdc.energy.gov/vehicles/electric_emissions.php" https://www.afdc.energy.gov/vehicles/electric_emissions.php, accessed June 2018.

WC2035 Plan would have a significant GHG impact with respect to operational emissions, and that this significant impact could not be mitigated and was therefore unavoidable. Accordingly, the Project's operation-related GHG impact was adequately addressed in the WC2035 Plan FEIR.

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

Significant and Unavoidable Impact. The WC2035 Plan FEIR concluded that the WC2035 Plan could potentially conflict with the State's 2006 Global Warming Solutions Act (AB 32). The WC2035 Plan FEIR also concluded that the WC2035 Plan could conflict with the City's ClimateLA Plan (WC2035 Plan DEIR p. 4.2-39). The ClimateLA Plan commits the City to a goal of reducing emissions of carbon dioxide (CO_2) to 35 percent below 1990 levels by 2030 through strategies such as increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on automobiles. In addition, the WC2035 Plan FEIR stated that a large amount of the increase in operational GHG emissions is a direct result of increased VMT. Although implementation of the WC2035 Plan would result in GHG reductions due to the transportation improvement and mitigation program, such regional reductions in VMT could not be quantified. In the absence of information regarding where growth would be reduced in the City, the WC2035 Plan FEIR conservatively concluded that increases in GHG emissions would have the potential to interfere with the implementation of the ClimateLA plan, and subsequently could interfere with the State's ability to meet its goals under AB 32. Therefore, it determined that the operational impacts from the WC2035 Plan implementation are considered significant and unavoidable. (WC2035 Plan DEIR pp. 4.2-36, 4.2-38-39)

This analysis is fully applicable to the Project. While the Project would incorporate measures to reduce Project-related GHG emissions, such as water efficient landscaping, energy optimization, construction waste management, enhanced refrigerant management, and achieving the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Silver Certification (or equivalent), the Project would result in greater GHG emissions compared to the existing site. As was discussed in the WC2035 Plan FEIR, the increase in GHG emissions, particularly from the increase in local VMT, could potentially conflict with the State's GHG reduction goals. Similarly, the Project's increase in GHG emissions, particularly from the increase in VMT, could also potentially conflict with the City's ClimateLA plan.

Consistent with the findings in the WC2035 Plan FEIR, the Project would be consistent with regional land use plans. The Metro Shuttle Line 601 is the recently implemented Warner Center Shuttle, which now provides two stops located adjacent to and on the Project Site – one stop is located at the northwest intersection of Burbank Boulevard and De Soto Avenue and the other stop to the west of that along Warner Center Lane, just north of Burbank Boulevard – and runs through the Project Site along Warner Center Lane. The Warner Center Shuttle provides direct connection to and from the Metro Orange Line Canoga Station and throughout Warner Center, including direct connection to the Warner Center Towers, Warner Center Corporate Park, and Westfield Topanga, the Village and the Promenade. The Warner Center Shuttle also stops at the Warner Center Transit Hub at the intersection of Oxnard Street and Owensmouth Avenue. Additionally, there are two bus stops located immediately adjacent to the Project Site, one on De Soto Avenue (Los Angeles

County Metro Line 244 and Santa Clarita Transit Commuter Express Line 796) and the other on Burbank Boulevard (Ventura County Transportation Commission Highway 101/Conejo Connection and Antelope Valley Transit Authority Line 787). Therefore, the Project would locate both jobs and residents closer to transit compared to existing conditions.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1. This results in a further reduction of VMT in comparison to the VMT assumed for the redevelopment of the Project Site in the WC2035 Plan FEIR.

In any event, a second-tier CEQA document is not required to re-analyze a significant impact that is not susceptible to being mitigated to a level of insignificance. Cal. Pub. Res. Code § 21068.5; State CEQA Guidelines § 15152(f). The WC2035 Plan FEIR concluded that buildout under the WC2035 Plan would have a significant GHG impact with respect to construction and operational emissions, and that this significant impact could not be mitigated and was therefore unavoidable.

Although the Project would be consistent with regional land use plans and growth projections, the Project could potentially conflict with the State's GHG reduction goals and the City's ClimateLA plan. Therefore, the Project's GHG impact would be significant and unavoidable and this impact was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following mitigation measures from the WC2035 Plan FEIR are recommended for the Project to mitigated impacts related to GHG emissions (these mitigation measures have been non-substantively modified to apply specifically to the Project):

AQ-4: The Applicant shall provide rideshare and transit incentives to construction personnel.

AQ-5: The Applicant shall configure construction parking to minimize interference with traffic lanes.

AQ-6: The Applicant shall minimize the obstruction of through-traffic in the vicinity of construction sites.

AQ-7: The Applicant shall use flag people during construction to guide traffic properly.

AQ-8: The Applicant shall require that construction activities that could affect roadways be scheduled for off-peak periods.

AQ-22: All landscaping shall be required to be drought tolerant to reduce water consumption and provide passive solar benefits.

U-4: The Applicant shall implement water conservation measures in new development that shall include, but not be limited to, the following:

- Installation of high-efficiency toilets (1.28 gallons per flush or less, includes dual flush
- High-efficiency urinals (0.125 gallons per flush or less, includes waterless)
- Restroom faucet flow rate of 1.5 gallons per minute or less
- Public restroom faucet flow rate of 0.5 gallons per minute or less and self-closing
- Showerhead flow rate of 2.0 gallons per minute or less
- Limit of one showerhead per shower stall
- High efficiency clothes washers (water factor of 4.0 or less)
- High efficiency dishwashers (Energy Star rated)
- Domestic water heating system located in close proximity to point(s) of use, as feasible
- Use of tankless and on-demand water heaters as feasible
- Cooling towers must be operated at a minimum of 5.5 cycles of concentration
- Install on-site water recycling as feasible
- Use of recycled water (if available) for appropriate end uses (irrigation, cooling towers, sanitary)
- Single pass cooling shall be prohibited (e.g. any vacuum pumps or ice machines)
- Irrigation shall include:
  - Weather-based irrigation controller with rain shutoff
  - Flow sensor and master valve shutoff (for large landscaped areas)
  - Matched precipitation (flow) rates for sprinkler heads
  - Drip/microspray/subsurface irrigation where appropriate
  - Minimum irrigation system distribution uniformity of 75%
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
  - Use of landscape contouring to minimize precipitation runoff.

U-5: With respect to each phase of the Project, prior to the issuance of a building permit, the Applicant shall consult with LADWP to identify feasible and reasonable measures to reduce water consumption, including, but not

limited to, systems to use reclaimed water for landscaping (should reclaimed water become available in Warner Center), drip irrigation, re-circulating hot water systems, water conserving landscape techniques (such as mulching, installation of drip irrigation systems, landscape design to group plants of similar water demand, soil moisture sensors, automatic irrigation systems, clustered landscaped areas to maximize the efficiency of the irrigation system), water conserving kitchen and bathroom fixtures and appliances, thermostatically controlled mixing valves for baths and showers, and insulated hot water lines, as per City adopted UBC requirements.

U-6: The Applicant shall comply with Phase I of the City of Los Angeles Emergency Water Conservation Plan including prohibiting hose watering of driveways and associated walkways; requiring decorative fountains to use recycled water, and repairing water leaks in a timely manner.

U-7: The Applicant shall comply with any additional mandatory water use restrictions imposed as a result of drought conditions.

U-8: The Applicant shall ensure that automatic sprinkler systems will be installed to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season, so that water is not wasted in excessive landscape irrigation.

U-14: During the design process for each phase of the Project, the Applicant shall consult with the Department of Water and Power, Energy Services Subsection and the Southern California Gas Company, the Commercial, Industrial or Residential Staff Supervisor, regarding possible Energy Conservation Measures for the Project.

Additional Project-Specific Information and Analysis

As discussed above, the Project's GHG impacts were adequately addressed in the WC2035 Plan FEIR. However, for informational purposes, and in order to provide additional project-specific information, set forth below is a discussion of the GHG environmental setting and regulatory framework, followed by an analysis of the Project's GHG impacts and GHG reduction measures that would support State, regional, and local efforts to reduce GHG emissions.

(a) Environmental Setting

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however, current data increasingly indicate that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to anthropogenic (human) GHG emissions is currently one of the most important and widely debated scientific, economic and political issues in the United States and the world. The extent to which increased concentrations of GHGs have caused or will cause climate change and the appropriate actions to limit and/or respond

to climate change are the subject of significant and rapidly evolving regulatory efforts at the federal and state levels of government.

GHGs are compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Not all GHGs possess the same ability to induce climate change; as a result, GHG contributions are commonly quantified in the units of equivalent mass of carbon dioxide (CO_2e). Mass emissions are calculated by converting pollutant specific emissions to CO2e emissions by applying the proper global warming potential (GWP) value.[5] These GWP ratios are provided by the Intergovernmental Panel on Climate Change (IPCC). Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report (SAR). The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). The updated GWPs in the IPCC AR4 have begun to be used in recent GHG emissions inventories. By applying the GWP ratios, project-related CO_2e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline. The CO_2e values are calculated for construction years as well as existing and project build-out conditions in order to generate a net change in GHG emissions for construction and operation. Compounds that are regulated as GHGs are discussed below.

Carbon Dioxide (CO_2): CO_2 is the most abundant GHG in the atmosphere and is primarily generated from fossil fuel combustion from stationary and mobile sources. CO_2 is the reference gas (GWP of 1) for determining the GWPs of other GHGs.

Methane (CH_4): CH_4 is emitted from biogenic sources (i.e., resulting from the activity of living organisms), incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. The GWP of CH_4 is 21 in the IPCC SAR and 25 in the IPCC AR4.

Nitrous Oxide (N_2O): N_2O produced by human-related sources including agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. The GWP of N_2O is 310 in the IPCC SAR and 298 in the IPCC AR4.

Hydrofluorocarbons (HFCs): HFCs are fluorinated compounds consisting of hydrogen, carbon, and fluorine. They are typically used as refrigerants in both stationary refrigeration and mobile air conditioning systems. The GWPs of HFCs ranges from 140 for HFC-152a to 11,700 for HFC-23 in the IPCC SAR and 124 for HFC-152a to 14,800 for HFC-23 in the IPCC AR4.

5 GWPs and associated CO_2e values were developed by the Intergovernmental Panel on Climate Change (IPCC), and published in its Second Assessment Report (SAR) in 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). The California Air Resources Board (CARB) reports GHG emission inventories for California using the GWP values from the IPCC AR4. Although the IPCC has released AR5 with updated GWPs, CARB has not yet updated the statewide GHG inventory or the scoping plan with the AR5 GWPs.

Perfluorocarbons (PFCs): PFCs are fluorinated compounds consisting of carbon and fluorine. They are primarily created as a byproduct of aluminum production and semiconductor manufacturing. The GWPs of PFCs range from 6,500 to 9,200 in the IPCC SAR and 7,390 to 17,700 in the IPCC AR4.

Sulfur Hexafluoride (SF_6): SF_6 is a fluorinated compound consisting of sulfur and fluoride. It is a colorless, odorless, nontoxic, nonflammable gas. It is most commonly used as an electrical insulator in high-voltage equipment that transmits and distributes electricity. SF_6 has a GWP of 23,900 in the IPCC SAR and 22,800 in the IPCC AR4.

State California Greenhouse Gas Emissions Inventory

CARB compiles GHG inventories for the State of California. Based on the 2015 GHG inventory data (i.e., the latest year for which data are available from CARB) prepared by CARB in 2017, California emitted 440.4 million metric tons of CO_2e ($MMTCO_2e$) including emissions resulting from imported electrical power.[6] Between 1990 and 2015, the population of California grew by approximately 9.3 million (from 29.8 to 39.1 million).[7] This represents an increase of approximately 31 percent from 1990 population levels. In addition, the California economy, measured as gross state product, grew from $773 billion in 1990 to $2.51 trillion in 2015 representing an increase of approximately 225 percent (over three times the 1990 gross state product).[8] Despite the population and economic growth, California's net GHG emissions only grew by approximately 2.2 percent. According to CARB, the declining trend coupled with the state's GHG reduction programs (such as the Renewables Portfolio Standard, Low Carbon Fuel Standard, vehicle efficiency standards, and declining caps under the Cap and Trade Program) demonstrate that California is on track to meet the 2020 GHG reduction target codified in California Health and Safety Code (HSC), Division 25.5, also known as The Global Warming Solutions Act of 2006 (i.e., AB 32).[9] **Table B-8**, *State of California Greenhouse Gas Emissions*, identifies and quantifies statewide anthropogenic GHG emissions and sinks (e.g., carbon sequestration due to forest growth) in 1990 and 2015. As shown in the table, the transportation sector is the largest contributor to statewide GHG emissions at approximately 37 percent in 2015.

6 California Air Resources Board, California Air Resources Board, California Greenhouse Gas Inventory for 2000-2015 by Category as Defined in the 2008 Scoping Plan, https://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_sum_2000-15.pdf. Accessed May 2018.

7 U.S. Census Bureau, Data Finders, http://www.census.gov/. 2009; California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State. State of California Department of Finance, American Community Survey, 2014. Available at: http://www.dof.ca.gov/Reports/Demographic_Reports/American_Community_Survey/documents/Web_ACS2015_Pop-Race.xlsx. Accessed May 2018.

8 California Department of Finance, Gross State Product. Available at: http://www.dof.ca.gov/Forecasting/Economics/Indicators/Gross_State_Product/documents/BBStateGDP_000.xls. Accessed May 2018. Amounts are based on current dollars as of the date of the report (May 4, 2018).

9 California Air Resources Board, Frequently Asked Questions for the 2016 Edition California Greenhouse Gas Emission Inventory, (2016). Available at: https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2014/ghg_inventory_faq_20160617.pdf. Accessed May 2018.

TABLE B-8
STATE OF CALIFORNIA GREENHOUSE GAS EMISSIONS

Category	Total 1990 Emissions using IPCC SAR ($MMTCO_2e$)	Percent of Total 1990 Emissions	Total 2015 Emissions using IPCC AR4 ($MMTCO_2e$)	Percent of Total 2015 Emissions
Transportation	150.7	35%	164.6	37%
Electric Power	110.6	26%	83.7	19%
Commercial	14.4	3%	12.8	3%
Residential	29.7	7%	23.2	5%
Industrial	103.0	24%	91.7	21%
Recycling and Waste [a]	–	–	8.7	2%
High GWP/Non-Specified [b]	1.3	<1%	19.1	4%
Agriculture/Forestry	23.6	6%	34.6	8%
Forestry Sinks	-6.7		-- [c]	--
Net Total (IPCC SAR)	**426.6**	**100%**	--	--
Net Total (IPCC AR4) [d]	**431**	**100%**	**440.4**	**100%**

[a] Included in other categories for the 1990 emissions inventory.

[b] High GWP gases are not specifically called out in the 1990 emissions inventory.

[c] Revised methodology under development (not reported for 2012).

[d] CARB revised the State's 1990 level GHG emissions using GWPs from the IPCC AR4.

Sources: California Air Resources Board, Staff Report – California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, (2007); California Air Resources Board, California Greenhouse Gas Inventory for 2000-2015 by Category as Defined in the 2008 Scoping Plan, https://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_sum_2000-15.pdf. Accessed May 2018.

Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's *Fifth Assessment Report, Summary for Policy Makers* states that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forc[es [*sic*] together."[10] A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively

10 Intergovernmental Panel on Climate Change, Climate Change 2014: Synthesis Report, Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, Summary for Policy Makers, 2014, page 5, http://ipcc.ch/pdf/assessment-report/ar5/syr/AR5_SYR_FINAL_SPM.pdf . Accessed May 2018.

publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.[11]

According to CARB, the potential impacts in California due to global climate change may include: loss in snow pack; sea-level rise; more extreme heat days per year; more high-ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation.[12] Below is a summary of some of the potential effects that could be experienced in California as a result of global warming and climate change.

Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state.[13] However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

In 2009, the California Natural Resources Agency (CNRA) published the *California Climate Adaptation Strategy* as a response to the Governor's Executive Order S-13-2008.[14] The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the *California Climate Adaptation Strategy*, the CEC was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers.[15] The website, known as Cal-Adapt, became operational in 2011.[16] The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea-level rise, snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the portion of the City in which the Project Site is located (Woodland Hills)

11 Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America, 2010, 107:12107-12109.

12 California Environmental Protection Agency, Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2006, http://climatechange.ca.gov/climate_action_team/reports/2006report/2006-04-03_FINAL_CAT_REPORT.PDF. Accessed May 2018.

13 California Energy Commission, Scenarios of Climate Change in California: An Overview, February 2006, http://www.energy.ca.gov/2005publications/CEC-500-2005-186/CEC-500-2005-186-SF.PDF. Accessed May 2018.

14 California Natural Resources Agency, Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

15 California Natural Resources Agency, Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

16 The Cal-Adapt website address is: http://cal-adapt.org.

could result in an average increase in temperature of approximately 7 to 11 percent (about 5.8 to 8.4°F) by 2070–2099, compared to the baseline 1961–1990 period.

Water Supply

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change."[17] For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation.[18] Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full.[19] Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.[20]

The California Department of Water Resources report on climate change and effects on the State Water Project, the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain." It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.[21] In its *Fifth Assessment Report*, the IPCC states "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions."[22]

17 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003, http://www.pacinst.org/reports/climate_change_and_california_water_resources.pdf. Accessed May 2018.

18 Ibid.

19 Ibid.

20 Ibid.

21 California Department of Water Resources, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006, http://www.water.ca.gov/climatechange/docs/DWRClimateChangeJuly06.pdf. Accessed May 2018.

22 Intergovernmental Panel on Climate Change, Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, Summary for Policy Makers, 2013, page 20, http://ipcc.ch/pdf/assessment-report/ar5/wg1/WG1AR5_SPM_FINAL.pdf. Accessed May 2018.

Hydrology and Sea-Level Rise

As discussed above, climate changes could potentially affect: the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high-tide and high-runoff events); sea-level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea-level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm, and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has a $30 billion agricultural industry that produces half the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.[23]

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2-11.5°F (1.1-6.4°C) by 2100, with significant regional variation.[24] Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 2 feet along most of the United States coastline. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage.[25]

(b) Regulatory Framework

Federal

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, methane and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. The USEPA implements numerous

23 California Climate Change Center, Our Changing Climate: Assessing the Risks to California, 2006, http://meteora.ucsd.edu/cap/pdffiles/CA_climate_Scenarios.pdf. Accessed May 2018.

24 National Research Council, Advancing the Science of Climate Change, 2010, http://dels.nas.edu/resources/static-assets/materials-based-on-reports/reports-in-brief/Science-Report-Brief-final.pdf. Accessed May 2018.

25 Parmesan, C., and H. Galbraith, Observed Impacts of Global Climate Change in the U.S., Prepared for the Pew Center on Global Climate Change, November 2004, https://www.c2es.org/site/assets/uploads/2004/11/observed-impacts-climate-change-united-states.pdf. Accessed May 2018.

voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR® labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

In *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), the United States Supreme Court held in April of 2007 that the USEPA has statutory authority under Section 202 of the Clean Air Act (CAA) to regulate GHGs. The Court did not hold that the USEPA was required to regulate GHG emissions; however, it indicated that the agency must decide whether GHGs cause or contribute to air pollution that is reasonably anticipated to endanger public health or welfare.

On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA. The USEPA adopted a Final Endangerment Finding for the six defined GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) on December 7, 2009. The Endangerment Finding is required before USEPA can regulate GHG emissions under Section 202(a)(1) of the CAA consistently with the United States Supreme Court decision. The USEPA also adopted a Cause or Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. These findings do not, by themselves, impose any requirements on industry or other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

On May 19, 2009, the President announced a national policy for fuel efficiency and emissions standards in the United States auto industry. The adopted federal standard applies to passenger cars and light-duty trucks for model years 2012 through 2016. The rule surpasses the prior Corporate Average Fuel Economy standards and requires an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO_2 per mile by model year 2016, based on USEPA calculation methods. These standards were formally adopted on April 1, 2010. In August 2012, standards were adopted for model year 2017 through 2025 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile. According to the USEPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle.[26] In 2017, the USEPA recommended no change to the GHG standards for light-duty vehicles for model years 2022-2025. The USEPA intends to reconsider the final determination by April 1, 2018.

State of California

California has promulgated a series of executive orders, laws, and regulations aimed at reducing both the level of GHGs in the atmosphere and emissions of GHGs from commercial and private activities within the State.

26 United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, August 2012, https://nepis.epa.gov/Exe/ZyPDF.cgi/P100EZ7C.PDF?Dockey=P100EZ7C.PDF. Accessed May 2018.

California Air Resources Board

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets state ambient air quality standards (California Ambient Air Quality Standards [CAAQS]), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

In 2004, CARB adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants (Title 13 California Code of Regulations [CCR], Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure generally does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location with certain exemptions for equipment in which idling is a necessary function such as concrete trucks. While this measure primarily targets diesel particulate matter emissions, it has co-benefits of minimizing GHG emissions from unnecessary truck idling.

In 2008, CARB approved the Truck and Bus regulation to reduce particulate matter and nitrogen oxide emissions from existing diesel vehicles operating in California (13 CCR, Section 2025, subsection (h)). CARB has also promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation, adopted by the CARB on July 26, 2007, aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models. While these regulations primarily target reductions in criteria air pollutant emission, they have co-benefits of minimizing GHG emissions due to improved engine efficiencies.

California Greenhouse Gas Reduction Targets

The Governor announced on June 1, 2005, through Executive Order S-3-05,[27] the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

In accordance with Executive Order S-3-05, the Secretary of CalEPA is required to coordinate efforts of various agencies, which comprise the California Climate Action Team (CAT), in order to collectively and efficiently reduce GHGs. These agencies include CARB, the Secretary of the

27 California Office of the Governor, Executive Order S-3-05, http://www.climatestrategies.us/library/library/download/294. Accessed May 2018.

Business, Transportation and Housing Agency, Department of Food and Agriculture, the Resources Agency, the California Energy Commission, and the Public Utilities Commission. The CAT provides periodic reports to the Governor and Legislature on the state of GHG reductions in the state as well as strategies for mitigating and adapting to climate change. The first CAT Report to the Governor and the Legislature in 2006 contained recommendations and strategies to help meet the targets in Executive Order S-3-05. The 2010 CAT Report, finalized in December 2010, expands on the policies in the 2006 assessment.[28] The new information detailed in the CAT Report includes development of revised climate and sea-level projections using new information and tools that became available and an evaluation of climate change within the context of broader social changes, such as land-use changes and demographic shifts.

On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

California Health and Safety Code, Division 25.5 – California Global Warming Solutions Act of 2006

In 2006, the California State Legislature adopted AB 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines GHGs as CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amends HSC Division 25.5 and establishes a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and includes provisions to ensure the benefits of state climate policies reach into disadvantaged communities.

28 California Environmental Protection Agency, Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2010, http://www.energy.ca.gov/2010publications/CAT-1000-2010-005/CAT-1000-2010-005.PDF. Accessed May 2018.

Climate Change Scoping Plan

AB 32 requires CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (HSC Section 38561 (h)). CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap.[29] The initial Scoping Plan was approved in 2008, and contained a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the State's long-range climate objectives.[30]

As required by HSC Division 25.5, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was originally set at 427 $MMTCO_2e$ using the GWP values from the IPCC SAR. CARB also projected the state's 2020 GHG emissions under no-action-taken (NAT) conditions – that is, emissions that would occur without any plans, policies, or regulations to reduce GHG emissions. CARB originally used an average of the state's GHG emissions from 2002 through 2004 and projected the 2020 levels at approximately 596 $MMTCO_2e$ (using GWP values from the IPCC SAR). Therefore, under the original projections, the state must reduce its 2020 NAT emissions by 28.4 percent in order to meet the 1990 target of 427 $MMTCO_2e$.

First Update to the Climate Change Scoping Plan

The First Update to the Scoping Plan was approved by CARB in May 2014 and built upon the initial Scoping Plan with new strategies and recommendations.[31] In 2014, CARB revised the target using the GWP values from the IPCC AR4 and determined that the 1990 GHG emissions inventory and 2020 GHG emissions limit is 431 $MMTCO_2e$. CARB also updated the State's 2020 NAT emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were recently adopted for motor vehicles and renewable energy. CARB's projected statewide 2020 emissions estimate using the GWP values from the IPCC AR4 is 509.4 $MMTCO_2e$.

Therefore, the emission reductions necessary to achieve the 2020 emissions target of 431 $MMTCO_2e$ would be 78.4 $MMTCO_2e$, or a reduction of GHG emissions by approximately 15.4 percent. In the 2017 Climate Change Scoping Plan, CARB provides the estimated projected statewide 2030 emissions and the level of reductions necessary to achieve the 2030 target of 40 percent below 1990 levels. CARB's projected statewide 2030 emissions takes into account 2020 GHG reduction policies and programs.

29 California Air Resources Board, Climate Change Scoping Plan, 2008. https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed May 2018.

30 Ibid.

31 California Air Resources Board, First Update to the Climate Change Scoping Plan, 2014, https://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf. Accessed May 2018.

2017 Climate Change Scoping Plan

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan at a public meeting held in December 2017.[32] The 2017 Scoping Plan outlines the strategies the State will implement to achieve the 2030 GHG reduction target, which build on the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, improved vehicle, truck and freight movement emissions standards, increasing renewable energy, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet our energy needs. The 2017 Scoping Plan also addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The 2017 Scoping Plan considers the following scenarios:

- Scoping Plan Scenario: Ongoing and statutorily required programs and continuing the Cap-and-Trade Program. This scenario was modified from the January 2017 Proposed Scoping Plan to reflect AB 398, including removal of the 20 percent refinery measure.
- Alternative 1: No Cap-and-Trade. Includes additional activities in a wide variety of sectors, such as specific required reductions for all large GHG sources, and more extensive requirements for renewable energy. Industrial sources would be regulated through command and control strategies.
- Alternative 2: Carbon Tax. A carbon tax to put a price, but not limit, on carbon, instead of the Cap-and-Trade Program.
- Alternative 3: All Cap-and-Trade. This alternative is the same as the Scoping Plan Scenario, while maintaining the LCFS at a 10 percent reduction in carbon intensity past 2020.
- Alternative 4: Cap-and-Tax. This would place a declining cap on individual industrial facilities, and individual natural gas and fuel suppliers, while also requiring them to pay a tax on each metric ton of GHGs emitted.

CARB states that the Scoping Plan Scenario "is the best choice to achieve the State's climate and clean air goals."[33] Under the Scoping Plan Scenario, the majority of the reductions would result from continuation of the Cap-and-Trade regulation. Additional reductions are achieved from electricity sector standards (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the Low Carbon Fuel Standard (LCFS), implementing the short-lived GHG strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan. The alternatives are designed to consider various combinations of these programs as well as consideration of a carbon tax in the event the Cap-and-Trade regulation is not continued. However, in July 2017, the California Legislature voted to extend the Cap-and-Trade regulation to 2030.

In the 2017 Scoping Plan, CARB provides the estimated projected statewide 2030 emissions and the level of reductions necessary to achieve the 2030 target of 40 percent below 1990 levels.

32 California Air Resources Board, California's 2017 Climate Change Scoping Plan, 2017, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed May 2018.

33 Ibid.

CARB's projected statewide 2030 emissions takes into account 2020 GHG reduction policies and programs.

The 2017 Scoping Plan discusses the role of local governments in meeting the State's greenhouse gas reductions goals because local governments have jurisdiction and land use authority related to: community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations.[34] Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures.[35]

The City of Los Angeles has taken the initiative in combatting climate change by developing programs such as the *GreenLA Plan*, *Sustainability City pLAn*, and *Green Building Code*, and each of these programs are discussed later under the Local subheading of this Greenhouse Gas Regulatory Framework section.

A summary of the GHG emissions reductions required under HSC Division 25.5 is provided in **Table B-9**, *Estimated Greenhouse Gas Emissions Reductions Required by HSC Division 25.5*.

TABLE B-9
ESTIMATED GHG EMISSIONS REDUCTIONS REQUIRED BY HSC DIVISION 25.5

Emissions Category	GHG Emissions ($MMTCO_2e$)
2008 Scoping Plan (IPCC SAR GWPs)	
2020 NAT Forecast (CARB 2008 Scoping Plan Estimate)	596
2020 Emissions Target Set by HSC Division 25.5 (i.e., 1990 Level)	427
Reduction below NAT Necessary to Achieve 1990 Levels by 2020	169 (28.4%) [a]
2014 First Update to Scoping Plan (IPCC AR4 GWPs)	
2020 NAT Forecast (CARB 2014 Scoping Plan Estimate)	509.4
2020 Emissions Target Set by HSC Division 25.5 (i.e., 1990 Level)	431
Reduction below NAT Necessary to Achieve 1990 Levels by 2020	78.4 (15.4%) [b]
2017 Scoping Plan	
2030 NAT Forecast ("Reference Scenario" which includes 2020 GHG reduction policies and programs)	389
2030 Emissions Target Set by HSC Division 25.5 (i.e., 40% below 1990 Level)	260
Reduction below NAT Necessary to Achieve 40% below 1990 Level by 2030	129 (33.2%) [c]

[a] 596 – 427 = 169 / 596 = 28.4%

[b] 509.4 – 431 = 78.4 / 509.4 = 15.4%

[c] 389 – 260 = 129 / 389 = 33.2%

Sources: California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011; California Air Resources Board, 2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition,

34 Ibid., page 97.

35 Ibid., page 97.

http://www.arb.ca.gov/cc/inventory/data/bau.htm. Accessed May 2018; California Air Resources Board, California's 2017 Climate Change Scoping Plan, 2017, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed May 2018.

Transportation Sector

In response to the transportation sector accounting for a large percentage of California's CO_2 emissions, AB 1493 (HSC Section 42823 and 43018.5), enacted on July 22, 2002, required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In setting these standards, CARB must consider cost effectiveness, technological feasibility, economic impacts, and provide maximum flexibility to manufacturers. The federal CAA ordinarily preempts state regulation of motor vehicle emission standards; however, California is allowed to set its own standards with a federal CAA waiver from the USEPA. In June 2009, the USEPA granted California the waiver.

However, as discussed previously, the USEPA and United States Department of Transportation (USDOT) adopted federal standards for model year 2012 through 2016 light-duty vehicles. Also as noted above, the USEPA and USDOT have adopted GHG emission standards for model year 2017 through 2025 vehicles. These standards are slightly different from the State's model year 2017 through 2025 standards, but the State of California has agreed not to contest these standards, in part due to the fact that while the national standard would achieve slightly less reductions in California, it would achieve greater reductions nationally and is stringent enough to meet state GHG emission reduction goals. In 2012, CARB adopted regulations that allow manufacturers to comply with the 2017 through 2025 national standards to meet state law.

In January 2007, Governor Brown enacted Executive Order S-01-07, which mandates the following: (1) establish a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) adopt a Low Carbon Fuel Standard (LCFS) for transportation fuels in California. CARB identified the LCFS as one of the nine discrete early actions in the Climate Change Scoping Plan. The LCFS regulations were approved by CARB in 2009 and established a reduction in the carbon intensity of transportation fuels by 10 percent by 2020 with implementation beginning on January 1, 2011. In September 2015, CARB approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In April 2017, the LCFS was brought before the Court of Appeal challenging the analysis of potential nitrogen dioxide impacts from biodiesel fuels. The Court directed CARB to conduct an analysis of nitrogen dioxide impacts from biodiesel fuels and froze the carbon intensity targets for diesel and biodiesel fuel provisions at 2017 levels until CARB has completed this analysis. On March 6, 2018 CARB issued its *Draft Supplemental Disclosure Discussion of Oxides of Nitrogen Potentially Caused by the Low Carbon Fuel Standard Regulation*.[36] Final approval of regulatory changes from CARB's analysis of

[36] California Air Resources Board, Low Carbon Fuel Standard and Alternative Diesel Fuels Regulation 2018, https://www.arb.ca.gov/regact/2018/lcfs18/lcfs18.htm. Accessed May 2018.

nitrogen dioxide impacts from biodiesel fuels is currently pending as of May 25, 2018.[37] The 2017 Climate Change Scoping Plan calls for increasing the LCFS from 10 percent to 18 percent by 2030.

Land Use Transportation Planning

SB 375 (Chapter 728, Statutes of 2008), which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. Under SB 375, CARB is required, in consultation with the state's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. In February 2011, CARB adopted the final GHG emissions reduction targets for the State's Metropolitan Planning Organizations, including the Southern California Association of Governments (SCAG), which is the Metropolitan Planning Organization for the region in which the City is located.[38] Of note, the reduction targets explicitly exclude emission reductions expected from the AB 1493 and the low carbon fuel standard regulations.

Under SB 375, the reduction target must be incorporated within that region's Regional Transportation Plan (RTP), which is used for long-term transportation planning, in a Sustainable Communities Strategy (SCS). Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS.

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. CARB asserts that this program would help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established and facilities subject to the cap would be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program pursuant to its authority under AB 32.[39] The development of this Program included a multi-year stakeholder process and consideration of potential impacts on disproportionately impacted communities. 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 would decline over time, achieving GHG emission reductions throughout the Program's duration.[40]

37 Ibid.

38 California Air Resources Board, Sustainable Communities, 2018, https://www.arb.ca.gov/cc/sb375/sb375.htm. Accessed May 2018.

39 California Code of Regulations (CCR), Title 17, Sections 95800 to 96023.

40 See generally California Code of Regulations (CCR), Title 17, Sections 95811, 95812.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 metric tons (MT) CO_2e) per year must comply with the Cap-and-Trade Program.[41] Triggering of the 25,000 $MTCO_2e$ 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.[42]

Each covered entity with a compliance obligation is required to surrender "compliance instruments" for each $MTCO_2e$ of GHG they emit.[43] Covered entities are allocated free allowances in whole or part (if eligible), buy allowances at auction, purchase allowances from others, or purchase offset credits. A "compliance period" is the time frame during which the compliance obligation is calculated. The years 2013 and 2014 were the first compliance period, the years 2015–2017 are the second compliance period, and the years 2018–2020 are the third compliance period. On July 17, 2017, the California legislature approved AB 398, extending the program an additional 10 years until 2030. At the end of each compliance period, each facility will be required to surrender compliance instruments to CARB equivalent to their total GHG emissions throughout the compliance period. There are also requirements to surrender compliance instruments covering 30 percent of the prior year's compliance obligation by November of each year. For example, in November 2014, a covered entity was required to submit compliance instruments to cover 30 percent of its 2013 GHG emissions.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in its First Update to the Climate Change Scoping Plan:

> *The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced.*[44]

In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program. However, as climate change is a global phenomenon and the effects of GHG emissions are considered cumulative in nature, a focus on aggregate GHG emissions reductions is warranted.

41 California Code of Regulations (CCR), Title 17, Section 95812.

42 California Code of Regulations (CCR), Title 17, Sections 95100-95158.

43 Compliance instruments are permits to emit, the majority of which will be "allowances," but entities also are allowed to use CARB-approved offset credits to meet up to 8% of their compliance obligations.

44 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, page 86, May 2014, (emphasis added).

Further, the reductions in GHG emissions that would be achieved by the Cap-and-Trade Program inherently are variable and, therefore, impossible to quantify with precision:

> *The Cap-and-Trade Regulation is different from most of the other measures in the Scoping Plan. The [R]egulation sets a hard cap, instead of an emission limit, so the emission reductions from the program vary as our estimates of "business as usual" emissions in the future are updated. In addition, the Cap-and-Trade Program works in concert with many of the direct regulatory measures—providing an additional economic incentive to reduce emissions. Actions taken to comply with direct regulations reduce an entity's compliance obligation under the Cap-and-Trade Regulation. So, for example, increased deployment of renewable electricity sources reduces a utility's compliance obligation under the Cap-and-Trade Regulation.*[45]

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. In other words, the Cap-and-Trade Program functions similarly to an insurance policy for meeting California 2020's GHG emissions reduction mandate:

> *The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the "capped sectors." Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap.*[46]
>
> *[T]he Cap-and-Trade Regulation provides assurance that California's 2020 limit will be met because the regulation sets a firm limit on 85 percent of California's GHG emissions.*[47]

In summary, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory architecture adopted by CARB under 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.

45 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, page 86, May 2014.

46 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, page 88, May 2014.

47 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, pages 86-87, May 2014.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.[48] Accordingly, GHG emissions associated with electricity usage for projects subject to the California Environmental Quality Act (CEQA) are covered by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.[49] While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015:

> *Suppliers of natural gas, suppliers of RBOB [Reformulated Gasoline Blendstock for Oxygenate Blending] and distillate fuel oils, suppliers of liquefied petroleum gas, and suppliers of liquefied natural gas specified in sections 95811(c), (d), (e), (f), and (g) that meet or exceed the annual threshold in section 95812(d) will have a compliance obligation beginning with the second compliance period.*[50]

The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). However, transportation fuels that are "supplied" in California, but can be demonstrated to have a final destination outside California, do not generate a compliance obligation. The underlying concept here is that CARB is seeking to capture tailpipe GHG emissions from the combustion of transportation fuels supplied to California end-users. Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle combustion of transportation fuels are covered by the Cap-and-Trade Program.

Regional

South Coast Air Quality Management District

The Project Site is located in the South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Gorgonio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished though air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

48 California Code of Regulations (CCR), Title 17, Section 95811(b).

49 California Code of Regulations (CCR), Title 17, Sections 95811, 95812(d).

50 California Code of Regulations (CCR), Title 17, Section 95851(b)(emphasis added).

The SCAQMD adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.[51] On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is Lead Agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., mixed-use/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.[52] The aforementioned Working Group has been inactive since 2011 and the SCAQMD has not formally adopted any GHG significance threshold for land use development projects.

Southern California Association of Governments

In February 2011, CARB adopted the GHG emissions reduction targets under SB 375 for the SCAG region. The target is a per capita reduction of 8 percent for 2020 and 13 percent for 2035 compared to the 2005 baseline. On April 7, 2016, SCAG adopted the 2016 RTP/SCS, which is an update to the previous 2012 RTP/SCS.[53] Using growth forecasts and economic trends, the 2016 RTP/SCS provides a vision for transportation throughout the region for the next 25 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The 2016 RTP/SCS successfully achieves and exceeds the GHG emission-reduction targets set by CARB by demonstrating an 8 percent reduction by 2020, 18 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level on a per capita basis.[54] Compliance with and

51 South Coast Air Quality Management District, Board Meeting, December 5, 2008, Agenda No. 31, http://www3.aqmd.gov/hb/2008/December/081231a.htm. Accessed May 2018.

52 South Coast Air Quality Management District, Greenhouse Gases CEQA Significance Thresholds, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed May 2018.

53 Southern California Association of Governments, Final 2016 RTP/SCS, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS. Accessed May 2018.

54 Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 8, April 2016, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf. Accessed May 2018.

implementation of 2016 RTP/SCS policies and strategies would have co-benefits of reducing per capita criteria air pollutant emissions associated with reduced per capita VMT.

SCAG's 2016 RTP/SCS provides specific strategies for successful implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the 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, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.

In addition, the 2016 RTP/SCS includes new strategies to promote active transportation, supports local planning and projects that serve short trips, expand understanding and consideration of public health in the development of local plans and projects, and supports improvements in sidewalk quality, local bike networks, and neighborhood mobility areas. It also proposes increasing access to the California Coast Trail, light rail and bus stations, and promoting corridors that support biking and walking, such as through a regional greenway network and local bike networks. The 2016 RTP/SCS proposes to better align active transportation investments with land use and transportation strategies, increase competitiveness of local agencies for federal and state funding, and to expand the potential for all people to use active transportation. CARB has accepted the SCAG GHG quantification determination in the 2016 RTP/SCS.[55]

City of Los Angeles

City of Los Angeles GreenLA Plan

In acknowledgment of the overlap between land use and GHG emissions, the City of Los Angeles, in May 2007, published *GreenLA, An Action Plan to Lead the Nation in Fighting Global Warming (GreenLA Plan)*, outlining the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities.[56] According to the *GreenLA Plan*, the City of Los Angeles is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels by 2030. To achieve this, the City will:

- Increase the generation of renewable energy

55 California Air Resources Board, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016, https://www.arb.ca.gov/cc/sb375/scag_executive_order_g_16_066.pdf. Accessed May 2018.

56 City of Los Angeles, GreenLA, An Action Plan to Lead the Nation in Fighting Global Warming (GreenLA Plan), May 2007, http://environmentla.org/pdf/GreenLA_CAP_2007.pdf" http://environmentla.org/pdf/GreenLA_CAP_2007.pdf. Accessed May 2018.

- Improve energy conservation and efficiency
- Change transportation and land use patterns to reduce dependence on automobiles

In 2008, the City released an implementation program for the GreenLA Plan, referred to as ClimateLA,[57] which includes a baseline GHG inventory for the City and provides detailed information about each action item discussed in the GreenLA Plan framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in city buildings, to converting the City's fleet vehicles to cleaner and more efficient models, and reducing water consumption. Information about proposed and/or ongoing programs, opportunities for achieving the City's goals, specific challenges, and a list of milestones is provided for each action item. The scope of these actions range from those impacting only municipal facilities, such as retrofitting City Hall with high-efficiency lighting systems, to those facilitating changes in the private sector, such as rebates for the purchase of energy-efficient appliances. ClimateLA is a living document, reflecting a process of ongoing learning and continuous improvement as technology advances and City departments develop expertise in the methods of lowering GHG emissions.

City of Los Angeles Sustainable City pLAn

The *Sustainable City pLAn* is a comprehensive and actionable directive from the mayor to improve the environmental, economic, and equitable conditions in the city of Los Angeles.[58] The pLAn is a tool that the mayor will use to manage the city and establish visions, goals, and metrics for City departments. The Sustainable City pLAn sets targets to reduce GHG emissions below the 1990 baseline by 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050, and establishes the following visions for City departments for the following categories:

- Environment: Local Water (lead the nation in water conservation and source the majority of water locally); Local Solar (increase Los Angeles's clean and resilient energy supplies by capturing energy from abundant sunshine); Energy Efficient Buildings (save money and energy by increasing the efficiency of buildings); Carbon and Climate Leadership (as a proactive leader on climate issues, strengthen Los Angeles's economy by dramatically reducing GHG emissions and rallying other cities to follow Los Angeles's lead); and Waste and Landfills (become the first big city in the United States to achieve zero-waste, and recycle and reuse most of its waste locally).
- Economy: Housing and Development (address Los Angeles's housing shortage, ensure that most new units are accessible to high-quality transit, and close the gap between income and rents); Mobility and Transit (invest in rail, bus lines, pedestrian/bike safety, and complete neighborhoods that provide more mobility options and reduce vehicle miles traveled); Prosperity and Green Jobs (strengthen and grow the economy including through increased jobs and investments in clean technology sectors); and Preparedness and Resiliency (prepare for natural disasters and decrease vulnerability to climate change).

57 City of Los Angeles, ClimateLA, 2008. http://environmentla.org/pdf/ClimateLA%20Program%20document%2012-08.pdf. Accessed May 2018.

58 City of Los Angeles, Mayor's Office of Sustainability, Sustainable City pLAn, http://plan.lamayor.org/wp-content/uploads/2017/03/the-plan.pdf. Accessed May 2018.

- Equity: Air Quality (healthy air to breathe); Environmental Justice (ensure the benefits of the pLAn extend to all Angelenos); Urban Ecosystem (have access to parks, open space, including a revitalized Los Angeles River Watershed); and Livable Neighborhoods (live in safe, vibrant, well-connected, and healthy neighborhoods).

City of Los Angeles Green Building Code

In 2011, 2014, and 2016, Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the GreenLA Building Code, was amended to incorporate various provisions of the CALGreen Code. The City's Green Building Code includes mandatory requirements and elective measures for three categories of buildings: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alternations to residential and non-residential buildings.

Transportation Impact Study Guidelines

The City of Los Angeles Department of Transportation (LADOT) has developed the *Transportation Impact Study Guidelines* (December 2016) to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of a traffic impact study. The Guidelines emphasize sustainability, smart growth, transportation demand management strategies, multi-modal strategies, and reduction of GHG emissions in addition to traditional traffic flow considerations when evaluating and minimizing impacts to the City's transportation system as a result of land use policy decisions. The Guidelines establish the reduction of vehicle trips and VMT as a policy goal and thus is an implementing mechanism of the City's strategy to reduce land use transportation-related GHG emissions consistent with HSC Division 25.5 and SB 375.

(c) Environmental Impacts

Consistency with Applicable GHG Reduction Plans and Policies

A significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Climate Scoping Plan, SCAG's 2016 RTP/SCS, and the City's GreenLA Plan, Sustainable City pLAn, and Green Building Code.

CARB's Climate Change Scoping Plan

Since the WC2035 Plan FEIR was published in 2012, the State has promulgated new regulations aimed at reducing GHG emissions from sectors relevant to the Project, including the residential and commercial energy, waste, and transportation sectors. The primary focus of many of the Statewide and regional mandates, plans, policies and regulations is to address worldwide climate change. Due to the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's individual increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. The GHG emissions of the Project alone would not likely cause a direct physical change in the environment.

As such, the Statewide approach targets GHG reductions from a sector-wide basis. According to the California Air Pollution Control Officers Association (CAPCOA), "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[59] It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone.

Table B-10, *Consistency with Applicable Greenhouse Gas Reduction Strategies*, contains a list of GHG-reducing strategies that are potentially applicable to the Project. The analysis describes the consistency of the Project with these strategies that support the State's strategies in the Climate Change Scoping Plan to reduce GHG emissions. The Climate Change Scoping Plan relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program. As shown below, the Project would implement applicable WC2035 Plan FEIR Mitigation Measures AQ-4 through AQ-8, AQ-22, water conservation Mitigation Measures U-4 through U-8, and energy conservation Mitigation Measure U-14, and otherwise incorporate characteristics to reduce energy use, conserve water, reduce waste generation, and reduce vehicle travel consistent with Statewide strategies and regulations. While Mitigation Measures WC-AQ-17 through WC-AQ-21 do not apply to the Project because they are obligations of the City, not a private developer, the City's implementation of these measures would also contribute to GHG emissions reductions. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

TABLE B-10
CONSISTENCY WITH APPLICABLE GREENHOUSE GAS REDUCTION STRATEGIES

Sector / Source	Category / Description	Consistency Analysis
Energy		
California Renewables Portfolio Standard	Increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020.	**Consistent.** The Project would use electricity provided by LADWP, which is committed to achieving 35 percent renewables by 2020.
California Renewables Portfolio Standard and SB 350	Increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020. SB 350 requires 50 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	**Consistent.** The Project would use electricity provided by LADWP, which is required to meet the 2050 performance standard. The Project would also meet or exceed the applicable requirements of the State of California Green Building Standards (CALGreen) Code and the City's Green Building Code. The Project would incorporate energy efficiency and conservation measures as outlined in the applicable WC2035 Plan FEIR Mitigation Measures AQ-22, U-4 through U-8, and U-14.
CCR, Title 24	Energy Efficiency Standards for Residential and Nonresidential Buildings.	**Consistent.** The Project would meet or exceed the applicable requirements of the CALGreen Code and the City's Green Building Code. The Project would also incorporate energy efficiency and conservation measures as outlined in the applicable WC2035 Plan FEIR Mitigation Measures AQ-22, U-4 through U-8, and U-14.

59 California Air Pollution Control Officers Association, CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, 2008, http://capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf. Accessed May 2018.

Sector / Source	Category / Description	Consistency Analysis
Assembly Bill 1109	The Lighting Efficiency And Toxics Reduction Act (AB1109) prohibits manufacturing specified general purpose lights that contain levels of hazardous substances prohibited by the European Union. AB 1109 also requires a reduction in average statewide electrical energy consumption by not less than 50% from the 2007 levels for indoor residential lighting and not less than 25% from the 2007 levels for indoor commercial and outdoor lighting by 2018.	**Consistent.** The Project would meet or exceed the applicable requirements of the CALGreen Code and the City's Green Building Code and would also incorporate energy efficiency and conservation measures as outlined in the applicable WC2035 Plan FEIR Mitigation Measures AQ-22, U-4 through U-8, and U-14.
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the emissions standards for power plants.
California Green Building Standards Code Requirements	HVAC Systems will be designed to meet ASHRAE standards.	**Consistent.** The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2013, Appendix G and the Title 24-2016 Building Energy Efficiency Standards.
	Energy commissioning shall be performed for buildings larger than 10,000 square feet.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements.
	Air filtration systems are required to meet a minimum of MERV 8 or higher.	**Consistent.** The Project would meet or exceed this requirement as part of its compliance with the City's requirements, and the CALGreen Code.
	Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Stormwater Pollution Prevention Plan (SWPPP) required.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Indoor water usage must be reduced by 20% compared to current California Building Code Standards for maximum flow.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code
	All irrigation controllers must be installed with weather sensing or soil moisture sensors.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Wastewater usage shall be reduced by 20 percent compared to current California Building Standards.	**Consistent.** The Project would meet or exceed this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	**Consistent.** The Project would meet or exceed this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Requires documentation of types of waste recycled, diverted or reused.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Requires use of low VOC coatings consistent with AQMD Rule 1168.	**Consistent.** The Project would be consistent with this regulation and would meet or exceed the low VOC coating requirements.
	100 percent of vegetation, rocks, soils from land clearing shall be recycled or stockpiled on-site.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.

Sector / Source	Category / Description	Consistency Analysis
Mobile Sources		
AB 1493 (Pavley Regulations)	Reduces GHG emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model years 2017–2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions standards.
Low Carbon Fuel Standard (Executive Order S-01-07)	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards.
Advanced Clean Cars Program	In 2012, CARB adopted the Advanced Clean Cars (ACC) program to reduce criteria pollutants and GHG emissions for model year vehicles 2015 through 2025. ACC includes the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.	**Consistent.** The standards would apply to all vehicles used by Project's employees, residents, hotel guests, and visitors. In addition, the Project would include the installation of the conduit and panel capacity to accommodate electric vehicle charging stations based on LAMC and CALGreen Code requirements.
SB 375	SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the state's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.	**Consistent.** The Project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement "smart growth." The Project would provide employment opportunities in close proximity to off-site residential and other job centers in the City where people can live and work and have access to convenient modes of transportation that provides options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The Project would reduce VMT as a result of its urban infill location, with nearby access to public transportation less than one mile from the Project Site, and its proximity to other destinations including off-site residential, retail, and entertainment.
Water		
CCR, Title 24	Title 24 includes water efficiency requirements for new residential and non-residential uses.	**Consistent.** See discussion under CALGreen Code requirements above.
Senate Bill X7-7	The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20% by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal.	**Consistent.** See discussion under CALGreen Code requirements above.
Solid Waste		
California Integrated Waste Management Act (IWMA) of 1989 and AB 341	The IWMA mandated that state agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50 percent of their solid waste from disposal facilities. AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a statewide goal for 75 percent disposal reduction by the year 2020.	**Consistent.** The Project would be served by a solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with Citywide recycling targets. According to the City's *Zero Waste Progress Report* (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012.

Sector / Source	Category / Description	Consistency Analysis
Other Sources		
Climate Action Team	Reduce diesel-fueled commercial motor vehicle idling.	**Consistent.** The Project would be consistent with the CARB Air Toxics Control Measure to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time.
	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	**Consistent.** The Project would provide appropriate landscaping on the Project Site including vegetation and trees.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	**Consistent.** The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2013, Appendix G and the Title 24-2016 Building Energy Efficiency Standards.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors, and implementing intelligent transportation systems.	**Consistent.** The Project would incorporate physical and operational project characteristics that would reduce vehicle trips and VMT and encourage alternative modes of transportation for guests, tenants, and employees.
	Reduce energy use in private buildings.	**Consistent.** The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in ASHRAE 90.1-2013, Appendix G and the Title 24-2016 Building Energy Efficiency Standards.

SOURCE: ESA 2018.

In addition to the Project's consistency with applicable GHG reduction strategies, the Project would not conflict with the future anticipated statewide GHG reductions goals. Since the WC2035 Plan FEIR was published in 2012, CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels. These potential strategies include renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high-speed rail and other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems.[60] The Project would benefit from Statewide and utility-provider efforts to increase the portion of electricity provided from renewable resources. The Project would also benefit from Statewide efforts to increase the fuel economy standards of vehicles. The Project would support alternative transportation and reducing VMT growth by locating at an infill location

60 Energy + Environmental Economics, Summary of the California State Agencies' PATHWAYS Project: Long-Term Greenhouse Gas Reduction Scenarios, April 6, 2015, https://www.arb.ca.gov/html/fact_sheets/e3_2030scenarios.pdf. Accessed April 2018.

near transit. As of June of 2018, the Metro Orange Line no longer directly serves Warner Center. Instead, Orange Line buses operate between North Hollywood and Chatsworth with a transfer to and from the new Circulator at the Orange Line's Canoga Station. The Circulator provides shuttle service to the Project Site, using Warner Center Lane as a turnaround. As shown in Figure A-1, there are two bus stops located immediately adjacent to the Project Site, one on De Soto Avenue (Los Angeles County Metro Line 244 and Santa Clarita Transit Commuter Express Line 796) and the other on Burbank Boulevard (Ventura County Transportation Commission Highway 101/Conejo Connection and Antelope Valley Transit Authority Line 787). The Project includes the use of energy-efficient appliances and equipment. While CARB is in the process of developing a regulatory framework for the 2030 reduction target and GHG reduction strategies identified in the 2017 Scoping Plan, the Project would support and not impede implementation of these potential reduction strategies identified by CARB.

SCAG's 2016 RTP/SCS

Since the WC2035 Plan FEIR was published in 2012, SCAG has adopted the 2016 RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. Consistent with this finding, transportation-related GHG emissions are the largest sector of emissions from the Project. The purpose of the 2016 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2016 RTP/SCS, released in December 2015, states that "[e]ach [Metropolitan Planning Organization] is required to prepare an SCS in conjunction to [sic] with the RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375."[61] The 2016 RTP/SCS plans for regional population growth using smart land use strategies. As part of the 2016 RTP/SCS, "transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand."[62] Moreover, the 2016 RTP/SCS states that while "[p]opulation and job growth would induce land use change (development projects) and increase VMT, and would result in direct and indirect GHG emissions," the 2016 RTP/SCS would "supports sustainable growth through a more compact, infill, and walkable development pattern."[63]

Consistent with the 2016 RTP/SCS's alignment of transportation, land use and housing strategies, the Project would accommodate increases in population, households, employment, and travel demand by implementing smart land use strategies. As discussed previously, the Project Site is an infill location close to jobs, offsite housing, shopping and entertainment uses and in close proximity to existing and future public transit stops, which would result in reduced VMT, as compared to a

61 Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2015, page 3.8-37, http://scagrtpscs.net/Documents/2016/peir/draft/2016dPEIR_3_8_GreenhouseGases.pdf. Accessed May 2018.

62 Ibid, page 3.8-35.

63 Ibid, page 3.8-36.

project of similar size and land uses at a location without close and walkable access to offsite destinations and public transit stops.

The estimated reduction in VMT for the Project is consistent with the data provided in the Traffic Volume Review (see Appendix K to this Tiered IS) and area-specific data in the Health Atlas, published by the City in June 2013[64] and by the CAPCOA guidance, *Quantifying Greenhouse Gas Mitigation Measures*.[65] The Health Atlas is not a plan specifically developed to reduce GHG emissions. Nonetheless, while the primary focus of the Health Atlas is on factors that affect the health behaviors and health status of residents and workers in the City, some of the data is relevant to land use GHG emissions as those emissions reflect similar issues regarding land use patterns, urban design, and transportation systems. The Health Atlas is also used to determine project consistency with regional planning efforts in accordance with the 2016 RTP/SCS to reduce VMT and associated emissions. The CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, provides emission reduction calculation formulas for transportation characteristics and measures.

As detailed below, data collected by the City in support of its Health Atlas demonstrates that the Project is located in an area in which mobile source GHG emissions would be substantially reduced relative to the Citywide and Statewide average and that the Project would therefore be consistent with the 2016 RTP/SCS. The Health Atlas includes a number of findings related to land use mix and diversity, employment density, walkability, access to public transit, and other land use transportation findings organized by Community Plan area. The Project is located in the area subject to the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan (Community Plan). A summary and analysis of the Health Atlas findings relative to the Community Plan area are provided below.

- **Land Use Diversity:** According to the Health Atlas, a "mix of land uses can increase walking and other physical activity" and "offer more destinations for non-automobile trips."[66] The Health Atlas evaluates land use diversity based on the presence of 19 types of uses or amenities, including supermarkets, convenience stores, banks, gyms, department stores, farmer's markets, libraries, and parks, grouped into four categories: food retail, community-serving retail, services, civic and community facility. The Community Plan area scored relatively high out of the 35 Community Plan Areas, indicating that the area has a high number of different types of amenities available in the Community Plan area (a score of 12, which is in the highest one-third of the scores).[67] The data indicates that the Community Plan area has a high potential for walkability and offers a high number of destinations available for non-motorized trips.[68]

  These findings are substantiated by the CAPCOA guidance, *Quantifying Greenhouse Gas Mitigation Measures*. CAPCOA measure LUT-3 (Increase Diversity of Urban and Suburban Developments [Mixed Use]) states that "different types of land uses near one another can

64 City of Los Angeles, Health Atlas for the City of Los Angeles, June 2013, http://planning.lacity.org/cwd/framwk/healthwellness/text/HealthAtlas.pdf. Accessed April 2018.

65 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, http://capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf. Accessed April 2018.

66 City of Los Angeles, Health Atlas for the City of Los Angeles, pages 86-87, June 2013.

67 City of Los Angeles, Health Atlas for the City of Los Angeles, pages 87, June 2013.

68 City of Los Angeles, Health Atlas for the City of Los Angeles, pages 87, June 2013.

decrease VMT since trips between land use types are shorter and may be accommodated by non-auto modes of transport."[69] The Health Atlas findings are also related to the goals and benefits of the 2016 RTP/SCS, which seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them."[70] According to SCAG, giving people more transportation choices and providing greater opportunities for biking and walking reduces the number of people who drive alone and encourages people to use alternative modes of travel.[71] The high scores for the number of destinations available for non-motorized trips within the Community Plan area[72] supports the expectation that projects located in the area would achieve substantial reductions in VMT and associated mobile source emissions relative to the citywide average.

Therefore, based on City data and expert guidance from State and regional agencies, the Project would result in a substantial reduction in emissions from mobile sources and would have a substantially greater level of transportation efficiency when compared to the Citywide and Statewide average. Furthermore, the land use diversity scores for the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area in the Health Atlas show that the Project would be located in an area consistent with the regional SCAG 2016 RTP/SCS goals to improve mobility and access to diverse destinations, and to reduce vehicular demand and associated emissions.

- **Employment Density:** The Health Atlas recognizes that "[h]igher levels of employment density, particularly retail job densities, are associated with more walking trips" as they "allow for more frequent and comprehensive transit service."[73] In turn, "[d]enser employment districts which are rich in transit service typically result in more walking and transit use … and makes jobs more accessible to all residents."[74] The Health Atlas evaluates employment density as the number of jobs per square mile. The Community Plan area has an employment density of nearly 3,350 jobs per square mile.[75] The Citywide average employee density is approximately 1,185 jobs per square mile.[76] The data indicates that the Community Plan Area has a high potential for walkability and making use of frequent and comprehensive transit services, such as the new Circulator at the Orange Line's Canoga Station that provides shuttle service to the Project Site, using Warner Center Lane as a turnaround, and connecting bus lines.

  These findings are substantiated by the CAPCOA guidance measure LUT-1 (Increase Density), which states that "[i]ncreased densities affect the distance people travel and provide greater options for the mode of travel they choose."[77] Measure LUT-1 also states that increased densities "provides a foundation for implementation of many other strategies which would

69 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, page 162.

70 Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 16, April 2016.

71 Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 14, April 2016.

72 City of Los Angeles, Health Atlas for the City of Los Angeles, pages 87, June 2013.

73 City of Los Angeles, Health Atlas for the City of Los Angeles, page 90, June 2013.

74 City of Los Angeles, Health Atlas for the City of Los Angeles, page 90, June 2013.

75 City of Los Angeles, Health Atlas for the City of Los Angeles, pages 90, June 2013.

76 City of Los Angeles, Health Atlas for the City of Los Angeles, page 102, June 2013.

77 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, page 155, 2010.

benefit from increased densities" such as "enhanced transit service."[78] The Health Atlas findings are also related to the goals and benefits of the SCAG 2016 RTP/SCS, which seeks improved mobility and access and implementation of land use strategies that encourage walking, biking, and transit use, resulting in reduced vehicular demand and associated pollutant emissions.[79] The high employment density of the Community Plan area supports the expectation that projects located in the area would have high levels of walkability and high potential for transit usage. As a result, the Project would be expected to achieve substantial reductions in VMT and associated mobile source emissions relative to the citywide and statewide average.

Therefore, based on city data and expert guidance from State and regional agencies, the Project's location in an employment-dense area would result in a substantial reduction in emissions from mobile sources and would have a substantially greater level of transportation efficiency when compared to the Citywide and Statewide average. Furthermore, the land employment density score for the Community Plan area in the Health Atlas shows that the Project would be located in an area consistent with the regional 2016 RTP/SCS goals to improve mobility and access to diverse destinations, and to reduce vehicular demand and associated emissions.

The above data from the City's Health Atlas not only provides support for the VMT reduction findings in this analysis, but also demonstrates that the Project's design and location are consistent with local and regional goals to reduce GHG emissions from transportation. Based on the Traffic Volume Review (see Appendix K to this Tiered IS, the Project's mix of uses, specific location less than one mile to high-quality transit, including the new Circulator at the Orange Line's Canoga Station and multiple bus routes, its close proximity to other offsite retail, restaurant, entertainment, commercial and job destinations, and its walkable environment support the finding in this analysis that the Project would achieve a reduction in VMT better than the City average and better than similar land uses at sites around the country.

The Project would be consistent with and support the goals and benefits of the 2016 RTP/SCS, which seeks "improved mobility and accessibility… to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices."[80] The 2016 RTP/SCS seeks to implement "strategies focused on compact infill development, superior placemaking (the process of creating public spaces that are appealing), and expanded housing and transportation choices."[81] The high scores for walkability and number of destinations available for non-motorized trips within the Community Plan area shows that the existing infrastructure and built environment is sufficiently developed such that projects located in the area would be expected to achieve substantial and credible reductions in trip distances and overall VMT. The high employment density of the Community Plan area supports the expectation that projects located in the area would provide high levels of walkability and high potential for transit usage by project

78 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, page 155, 2010.

79 Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, pages 13-15, April 2016.

80 Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 160, April 2016.

81 Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 14, April 2016.

tenants, guests, employees and visitors. The Project would therefore be consistent with the 2016 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. As such, the Project would be consistent with regional plans to reduce VMT and associated GHG emissions.

Table B-11, *Consistency with Applicable SCAG 2016 RTP/SCS Actions and Strategies*, contains a list of GHG-reducing actions and strategies from the SCAG 2016 RTP/SCS that are potentially applicable to the Project. It describes the consistency of the Project with these strategies. As shown below, the Project would implement mitigation measures and incorporate characteristics to reduce vehicle travel consistent with the SCAG 2016 RTP/SCS. As a result, the Project would not conflict with applicable SCAG 2016 RTP/SCS actions strategies to reduce GHG emissions.

TABLE B-11
CONSISTENCY WITH APPLICABLE SCAG 2016 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Actions and Strategies		
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 alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would not impact the City's or SCAG's ability to encourage the use of alternative-fueled vehicles through various policies and programs. Specifically, the Project would support a land use pattern that provides increased opportunity of use of alternative transportation modes. Additionally, the Project would encourage the use of alternative-fueled vehicles by installing conduit and panel capacity to accommodate electric vehicle charging stations based on LAMC and CALGreen Code requirements.
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 facilitate pedestrian and bicycle movement through the Project Site. The Project would also include improved and landscaped Publicly Accessible Open Space areas throughout the Project Site, connecting the Project to the adjoining public streets, connecting buildings on the Project Site together, and creating a pleasant pedestrian experience for occupants, users and visitors of the Project. The Project also includes three Pedestrian Adapted Pathways, although only one is required under Section 6.2.5.3.1(b) of the WC2035 Plan. The Pedestrian Adapted Pathways function as portions of the required Publicly Accessible Open Space. It would also connect to the surrounding commercial and recreational areas. The Project would locate residential, retail, office, and hotel uses within an area that has public transit, employment opportunities, and restaurants and entertainment.
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	**Consistent.** 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. The Project would also incorporate measures to reduce air pollutant emissions, minimize hazards, and ensure water quality. As an example, the Project would comply with fugitive dust control measures included in SCAQMD Rule 403.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
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.** The Project would support this action/strategy by creating a mixed-use infill development comprising complementary uses that offer employment and other community-serving opportunities. The Project supports the development of complete communities by co-locating complementary residential, retail, office, and hotel land uses within a quarter-mile of existing off-site commercial and office uses, residential uses, and institutional uses (Kaiser Permanente Woodland Hills Medical Center and the Woodland Hills Academy Middle School), and being located in a walkable area served by frequent and comprehensive transit less than one mile from the Project Site.
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 supports the development of complete communities by co-locating complementary residential, retail, office, and hotel land uses within a quarter-mile of existing offsite commercial and office uses, residential uses, and institutional uses (Kaiser Permanente Woodland Hills Medical Center and the Woodland Hills Academy Middle School), and being located in a walkable area served by frequent and comprehensive transit less than one mile from the Project Site. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.
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 support alternative transportation and reducing VMT growth by locating at an infill location near transit. The Metro Shuttle Line 601 is the recently implemented Warner Center Shuttle, which now provides two stops located adjacent to and on the Project Site – one stop is located at the northwest intersection of Burbank Boulevard and De Soto Avenue and the other stop to the west of that along Warner Center Lane, just north of Burbank Boulevard – and runs through the Project Site along Warner Center Lane. The Warner Center Shuttle provides direct connection to and from the Metro Orange Line Canoga Station and throughout Warner Center, including direct connection to the Warner Center Towers, Warner Center Corporate Park, and Westfield Topanga, the Village and the Promenade. The Warner Center Shuttle also stops at the Warner Center Transit Hub at the intersection of Oxnard Street and Owensmouth Avenue. Additionally, there are two bus stops located immediately adjacent to the Project Site, one on De Soto Avenue (Los Angeles County Metro Line 244 and Santa Clarita Transit Commuter Express Line 796) and the other on Burbank Boulevard (Ventura County Transportation Commission Highway 101/Conejo Connection and Antelope Valley Transit Authority Line 787). Additionally, the Project would provide distinctive sidewalks, landscaping, wayfinding signage, neighborhood-serving commercial uses, and outdoor activity to attract and project residents, patrons, visitors, employees, and neighborhood residents.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Consider developing healthy community or active design guidelines that promote physical activity and improved health.	Local Jurisdictions	**Consistent.** The Project would facilitate pedestrian and bicycle movement through the Project Site. The Project would also provide improved and landscaped Publicly Accessible Open Space areas throughout the Project Site, connecting the Project to the adjoining public streets, connecting buildings on the Project Site together, and creating a pleasant pedestrian experience for occupants, users and visitors of the Project. The Project also includes three Pedestrian Adapted Pathways, although only one is required under Section 6.2.5.3.1(b) of the WC2035 Plan. The Pedestrian Adapted Pathways function as portions of the required Publicly Accessible Open Space. It would also connect to the surrounding commercial and recreational areas. The Project would locate residential, retail, office, and hotel uses within an area that has public transit, and employment opportunities, restaurants and entertainment all within walking distance.
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State, SCAG	**Consistent.** The Project is consistent with the goals of SB 375, including the goal to reduce VMT and the corresponding emission of GHGs. The Project has many TOD features, such as co-locating complementary residential, retail, office, and hotel land uses within a quarter-mile of existing off-site commercial and office uses, residential uses, and institutional uses (Kaiser Permanente Woodland Hills Medical Center and the Woodland Hills Academy Middle School), and being located in a walkable area served by frequent and comprehensive transit less than one mile from the Project Site. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.
Transportation Network Actions and Strategies		
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 Site is an infill location close to jobs, off-site housing, shopping and entertainment uses and in close proximity to existing and future public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. The proximity of the Project to alternative transit modes, including regional rail and bus lines, would support the region's transportation investment and the sustainability of the regional transportation system.
Explore and implement innovative strategies and projects that enhance 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.		**Consistent.** The Project would facilitate pedestrian and bicycle movement through the Project Site. The Project would also provide improved and landscaped Publicly Accessible Open Space areas throughout the Project Site, connecting the Project to the adjoining public streets, connecting buildings on the Project Site together, and creating a pleasant pedestrian experience for occupants, users and visitors of the Project. The Project also includes three Pedestrian Adapted Pathways, although only one is required under Section 6.2.5.3.1(b) of the WC2035 Plan. The Pedestrian Adapted Pathways function as portions of the required Publicly Accessible Open Space. It would also connect to the surrounding commercial and recreational areas. The Project would locate residential, retail, office, and hotel uses within an area that has public transit, and employment opportunities, restaurants and entertainment all within walking distance. In addition, the Project would install the conduit and panel capacity to accommodate electric vehicle charging stations based on LAMC and CALGreen Code requirements.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
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 would intensify development in an area served by the new Circulator at the Orange Line's Canoga Station and multiple bus. Furthermore, the Project would provide a high-density residential, retail, office, and hotel uses in an area with pedestrian access to a large range of entertainment and commercial uses.
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	**Consistent.** The Project has many TOD features, such as co-locating complementary residential, retail, office, and hotel land uses within a quarter-mile of existing off-site commercial and office uses, residential uses, and institutional uses (Kaiser Permanente Woodland Hills Medical Center and the Woodland Hills Academy Middle School), and being located in a walkable area served by frequent and comprehensive transit less than one mile from the Project Site. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions. The Project would improve pedestrian connectivity by providing improved and landscaped Publicly Accessible Open Space areas throughout the Project Site, connecting the Project to the adjoining public streets, connecting buildings on the Project Site together, and creating a pleasant pedestrian experience for occupants, users and visitors of the Project. The Project also includes three Pedestrian Adapted Pathways, although only one is required under Section 6.2.5.3.1(b) of the WC2035 Plan. The Pedestrian Adapted Pathways function as portions of the required Publicly Accessible Open Space. It would also connect to the surrounding commercial and recreational areas. Further, the Project would provide distinctive sidewalks, landscaping, wayfinding signage, ground-floor retail uses, and outdoor activity areas to attract and accommodate residents, employees, hotel guests, and visitors.
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 options.	CTCs, Local Jurisdictions	**Consistent.** The Project would implement a TDM program pursuant to Section 7.8 of the WC2035 Plan. Implementation of the TDM program would reduce car trips and was incorporated into the modeled trip generation for the WC2035 Plan area.
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 implement a TDM program pursuant to Section 7.8 of the WC2035 Plan. Implementation of the TDM program would reduce car trips and was incorporated into the modeled trip generation for the WC2035 Plan area.
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	**Consistent.** The Project would support transportation goals via development of a mixed-use commercial/restaurant, residential, office and hotel project in close proximity to existing off-site commercial and residential uses and comprehensive transit. In addition, the Project is located in a HQTA, which is defined by the SCAG 2016 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or transit corridor with 15-minute or less service frequency during peak commute hours.
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	**Consistent.** The Project would implement a TDM program pursuant to Section 7.8 of the WC2035 Plan. Implementation of the TDM program would reduce car trips and was incorporated into the modeled trip generation for the WC2035 Plan area.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Encourage the 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.	Local Jurisdictions, COGs, SCAG, CTCs	**Consistent.** The Project is proposed on an infill location and would incorporate pedestrian pathways that would connect to the existing sidewalk network. The Project would improve pedestrian connectivity by providing improved and landscaped Publicly Accessible Open Space areas throughout the Project Site, connecting the Project to the adjoining public streets, connecting buildings on the Project Site together, and creating a pleasant pedestrian experience for occupants, users and visitors of the Project. The Project also includes three Pedestrian Adapted Pathways, although only one is required under Section 6.2.5.3.1(b) of the WC2035 Plan. The Pedestrian Adapted Pathways function as portions of the required Publicly Accessible Open Space. In addition, the Project would install conduit and panel capacity to accommodate electric vehicle charging stations based on LAMC and CALGreen Code requirements. The Project includes bicycle parking spaces (pursuant to LAMC Section 12.21.A.16(a), the Project will include 870 long-term bicycle parking spaces and 264 short-term bicycle parking spaces, for a total of 1,134 bicycle spaces). The Applicant would also implement a comprehensive TDM program pursuant to Section 7.8 of the WC2035 Plan. Implementation of the TDM program would promote non-automobile travel and reduce the use of single-occupant vehicle trips.
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	**Consistent.** The Project would implement a TDM program pursuant to Section 7.8 of the WC2035 Plan. Implementation of the TDM program would reduce car trips and was incorporated into the modeled trip generation for the WC2035 Plan area. The Project's residential, office, and hotel uses would provide occupants with appropriate connectivity within offices, dwelling units, and hotel rooms (e.g., wall-mounted telephone and internet connectivity ports and/or wireless internet connectivity) that would provide office employers and workers, residents, and hotel guests with the option to obtain communication services that would allow for telecommuting from within Project offices, dwelling units, and hotel rooms. Thus, the Project would not impact or conflict with the City's ability to encourage telecommuting.
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	**Consistent.** The Project would implement a TDM program pursuant to Section 7.8 of the WC2035 Plan. Implementation of the TDM program would reduce car trips and was incorporated into the modeled trip generation for the WC2035 Plan area.
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CRCs	**Consistent.** The Project's residential, office, and hotel uses would provide occupants with appropriate connectivity within offices, dwelling units, and hotel rooms (e.g., wall-mounted telephone and internet connectivity ports and/or wireless internet connectivity) that would provide office employers and workers, residents, and hotel guests with the option to obtain communication services that would allow for telecommuting from within Project offices, dwelling units, and hotel rooms. Thus, the Project would not impact or conflict with the City's ability to encourage telecommuting.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	SCAG, Local Jurisdictions	**Consistent.** The Project's residential, retail, office, and hotel uses would be in the urban area that would provide opportunities for bicycling and walking. The Project includes bicycle parking in compliance with LAMC requirements (Pursuant to LAMC Section 12.21.A.16(a), the Project will include 870 long-term bicycle parking spaces and 264short-term bicycle parking spaces, for a total of 1,134 bicycle spaces). Further, the Project would install the conduit and panel capacity to accommodate electric vehicle charging stations based on LAMC and CALGreen Code requirements
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	**Consistent.** The proximity of the Project to alternative transit modes, including regional rail and bus lines, would support the region's transportation investment and the sustainability of the regional transportation system.
Clean Vehicle Technology Actions and Strategies		
Support subregional 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 (Western Riverside COG and South Bay Cities COG) are put forward as best practices that others can adopt in the future. (See Appendix: Vehicle Technology, for more information.)	SCAG, Local Jurisdictions	**Consistent.** While the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would not impact the City's or SCAG's ability to encourage the use of alternative-fueled vehicles through various policies and programs. Specifically, the Project would support a land use pattern that provides increased opportunity of use of alternative transportation modes. Additionally, the Project would encourage the use of alternative-fueled vehicles by providing for the installation of the conduit and panel capacity to accommodate electric vehicle charging stations based on LAMC and CALGreen Code requirements.

SOURCE: ESA 2018.

City of Los Angeles GreenLA Plan and Sustainable City pLAn

The Project would be generally consistent with the applicable City GHG emissions reduction plans, policies, and regulations, including the City's GreenLA Plan and the City's Sustainable City pLAn. As discussed in Table B-12 and Table B-13 below, the Project would implement applicable WC2035 Plan FEIR mitigation measures and incorporate water conservation, energy conservation, tree-planting, and other features consistent with these plans. Therefore, the Project would be consistent with the City's applicable plans, policies, or regulations for GHG emissions.

In May 2007, the City published *GreenLA, An Action Plan to Lead the Nation in Fighting Global Warming (GreenLA Plan),* outlining the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities.[82] In 2008, the City released an implementation program for the GreenLA Plan, referred to as ClimateLA. When implemented, the following planned City actions, as presented in the GreenLA Plan, may further decrease emissions of GHGs from the Project. These actions are not under the control of the Applicant. However, they would nonetheless further reduce Project-related GHG emissions by:

82 See: http://environmentla.org/pdf/GreenLA_CAP_2007.pdf.

- Decreasing emissions from LADWP electrical generation and import activities
- Promoting walking and biking to work, within neighborhoods, and to large events and venues
- Expanding the regional rail network to reduce VMT

Since the WC2035 Plan FEIR was published in 2012, the City issued the *Sustainable City pLAn* in 2015, which is a comprehensive and actionable directive from the Mayor to improve the environmental, economic, and equitable conditions in the City.[83] The Mayor uses the Sustainable City pLAn to manage the City and establish visions, goals, and metrics for City Departments. The Sustainable City pLAn sets targets to reduce GHG emissions below the 1990 baseline by 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050.

Table B-12, *Consistency with City of Los Angeles GreenLA Plan*, and **Table B-13**, *Consistency with City of Los Angeles Sustainable City pLAn*, contains a list of GHG-reducing strategies applicable to the Project. This project-level analysis describes the consistency of the Project with these GHG emissions reduction goals and actions. As discussed in Table B-12 and Table B-13, the Project is consistent with the applicable goals and actions. In addition, as discussed, the Project would also result in GHG reductions beyond those specified by the City and would minimize the GHG emissions relative to the existing development on the Project Site conditions by incorporating energy efficient design features, and VMT reduction characteristics.

TABLE B-12
CONSISTENCY WITH CITY OF LOS ANGELES GREENLA PLAN

Action		Description	Consistency Analysis
Focus Area: Energy			
E6	Present a comprehensive set of green building policies to guide and support private sector development.	The City embarked on an effort to establish green building requirements, paired with incentives, for medium- to large-private projects. Buildings account for a majority of electricity use. Each building site is a microcosm of the environmental issues faced by the City, so addressing each site in a comprehensive manner will provide a variety of environmental benefits.	**Consistent.** The Project would be designed and operated to meet or exceed the applicable requirements of the CALGreen Code and the City's Green Building Code. The Project would incorporate energy efficiency and conservation measures as outlined in the applicable WC2035 Plan FEIR Mitigation Measures AQ-22, U-4 through U-8, and U-14. As a result, the Project would be consistent with City's green building policies.
Focus Area: Water			
W1	Meet all additional demand for water resulting from growth through water conservation and recycling.	The Mayor's Office and LADWP developed the *Securing LA's Water Future* plan, which is an aggressive, multi-faceted approach to developing a locally sustainable water supply. The plan includes a set of key short-term and long-term strategies to secure our water future, such as: Short-Term Conservation Strategies: • Enforcing prohibited uses of water (levying fines and sanctions against water abusers and increase water conservation awareness).	**Consistent.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation measures defined in the applicable WC2035 Plan FEIR Mitigation Measures AQ-22 and U-4 through U-8. The reductions would be achieved through measures such as the installation of water efficient fixtures that exceed applicable standards, drought-tolerant/California native plant species selection, irrigation system efficiency, and/or smart irrigation systems (e.g., weather-based controls) or other similar water efficiency measures. As a result, the Project

83 City of Los Angeles, Mayor's Office of Sustainability, Sustainable City pLAn, (2015). Available at: https://www.lamayor.org/plan. Accessed April 2018.

Action		Description	Consistency Analysis
		• Expanding the list of prohibited uses of water (possible further restrictions on watering landscape and washing/rinsing vehicles without a self-closing nozzle). • Extending outreach efforts, water conservation incentives, and rebates. • Encouraging regional conservation measures (encourage all water agencies in the region to adopt water conservation ordinances which include prohibited uses and enforcement). Long-Term Conservation Strategies: • Increasing water conservation through reduction of outdoor water use and new technology. • Maximizing water recycling. • Enhancing stormwater capture • Accelerating clean-up of the groundwater basin. • Expanding groundwater storage.	would be consistent with the applicable short- and long-term water conservation strategies.
W2	Reduce per capita water consumption by 20%.	See W1, above.	See W1, above.
W3	Implement the City's innovative water and wastewater integrated resources plan that will increase conservation, and maximize use of recycled water, including capture and reuse of stormwater.	See W1, above.	See W1, above.
Focus Area: Transportation			
T6	Make transit information easily available, understandable, and translated into multiple languages.	A Los Angeles Department of Transportation (LADOT) partnership with the Personnel Department and ELA will enable DOT to determine in which additional languages transit information should be provided. Facilitating access to transit information increases the likelihood of transit use, which can reduce single occupancy vehicle trips and help alleviate traffic congestion and, most important, reduce associated GHG emissions.	**Consistent.** The Project would implement a TDM program pursuant to Section 7.8 of the WC2035 Plan. Implementation of the TDM program would reduce car trips and was incorporated into the modeled trip generation for the WC2035 Plan area.

Action		Description	Consistency Analysis
T8	Promote walking and biking to work, within neighborhoods, and to large events and venues.	Promoting alternate modes of travel will reduce the carbon emissions associated with single occupancy vehicles (SOVs). As described in Action Items LU1 and LU2, the City is promoting high-density and mixed-use housing close to major transportation arteries. Such developments will also support the advancement of Action Item T8, by improving accessibility for those who wish to walk and bike to work.	**Consistent.** The Project would facilitate pedestrian and bicycle movement through the Project Site. The Project would also provide improved and landscaped Publicly Accessible Open Space areas throughout the Project Site, connecting the Project to the adjoining public streets, connecting buildings on the Project Site together, and creating a pleasant pedestrian experience for occupants, users and visitors of the Project. The Project also includes three Pedestrian Adapted Pathways, although only one is required under Section 6.2.5.3.1(b) of the WC2035 Plan. The Pedestrian Adapted Pathways function as portions of the required Publicly Accessible Open Space. It would also connect to the surrounding commercial and recreational areas. The Project would locate residential, retail, office, and hotel uses within an area that has public transit, employment opportunities, and restaurants and entertainment all within walking distance. As a result, the Project would be consistent with this action.
Focus Area: Land Use			
LU2	Promote and implement transit-oriented development (TOD).	TODs represent opportunities for creating cohesive, vibrant, walkable communities where fragmented, auto-dependent corridors now exist. TODs are a positive alternative to low-density traditional land use patterns that typically segregate housing, jobs and neighborhood services from one another. In contrast, TODs cluster these community elements in close proximity, so a greater portion of trips can be made by transit, bike, or on foot.	**Consistent.** The Project has many TOD features, such as co-locating complementary residential, retail, office, and hotel land uses within a quarter-mile of existing offsite commercial and office uses, residential uses, and institutional uses (Kaiser Permanente Woodland Hills Medical Center and the Woodland Hills Academy Middle School), and being located in a walkable area served by frequent and comprehensive transit less than one mile from the Project Site. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions. As a result, the Project is consistent with this City action.
Focus Area: Waste			
WsT1	Reduce or recycle 70% of trash by 2015.	Source reduction and recycling programs not only conserve natural resources and landfill space, but also confer climate benefits.	**Consistent.** The Project would be served by a solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with citywide recycling targets. According to the City's *Zero Waste Progress Report* (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012.[84]

84 City of Los Angeles Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013, https://bioenergyproducers.files.wordpress.com/2016/11/la-zero-waste-report.pdf. Accessed April 2018.

Action		Description	Consistency Analysis
Focus Area: Open Space and Greening			
OS/G3	Plant 1 million trees throughout Los Angeles.	The Mayor launched the "Million Trees LA" (MTLA) Initiative in September 2006. The initiative is rooted in the idea that natural processes can reduce pollution and transform our city into a sustainable, green city. The one million new trees will provide shade and reduce energy costs, clean the air, absorb the GHGs that cause global warming, capture polluted urban runoff, improve water quality, provide homes for wildlife, and add beauty to neighborhoods.	**Consistent.** The Project includes 1,084 new trees onsite and 56 new street trees as part of the landscaping. The Project would provide landscaping that would complement the aesthetic character of the Project Site and enhance its relationship to surrounding buildings. As a result, the Project would be consistent with this action and help the City to achieve its goal.

SOURCE: City of Los Angeles, GreenLA Plan, 2008; ESA 2018.

TABLE B-13
CONSISTENCY WITH CITY OF LOS ANGELES SUSTAINABLE CITY PLAN

Action	Description	Consistency Analysis
Focus Area: Environment		
Local Water	Lead the nation in water conservation and source the majority of water locally.	**Consistent**. The Project would incorporate water conservation measures as defined in the applicable WC2035 Plan FEIR Mitigation Measures AQ-22 and U-4 through U-8. The reductions would be achieved through measures such as the installation of water efficient fixtures that exceed applicable standards, drought-tolerant/California native plant species selection, irrigation system efficiency, and/or smart irrigation systems (e.g., weather-based controls) or other similar water efficiency measures. The Project would not conflict with the City's and LADWP's ability to provide locally sourced water.
Local Solar	Increase Los Angeles' clean and resilient energy supplies by capturing energy from abundant sunshine.	**Consistent**. Building rooftop areas without landscaping, pool, deck, garden or other improvements will be constructed as solar-ready for the future installation of on-site solar photovoltaic (PV) or solar water heating (SWH) systems consistent with applicable State of California Title 24 regulatory requirements.
Energy Efficient Buildings	Save money and energy by increasing the efficiency of buildings.	**Consistent**. The Project would be designed and operated to meet or exceed the applicable requirements of the CALGreen Code and the City's Green Building Code. The Project would incorporate energy efficiency and conservation measures as defined in the applicable WC2035 Plan FEIR Mitigation Measures AQ-22, U-4 through U-8, and U-14.
Carbon and Climate Leadership	As a proactive leader on climate issues, strengthen Los Angeles' economy by dramatically reducing GHG emissions and rallying other cities to follow Los Angeles' lead.	**Consistent**. The Project would be designed to incorporate energy and water efficient designs that exceed the standards, which would result in substantial GHG emissions reductions. The Project would also be located in an area well served by multiple public transportation options and in a walkable environment, which would substantially reduce transportation-related GHG emissions.

Action	Description	Consistency Analysis
Waste and Landfills	Become the first big city in the United States to achieve zero-waste, and recycle and reuse most of its waste locally.	**Consistent**. The Project would be served by a solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with citywide recycling targets.
Focus Area: Economy		
Mobility and Transit	Invest in rail, bus lines, pedestrian/bike safety, and complete neighborhoods that provide more mobility options and reduce vehicle miles traveled.	**Consistent**. The Project would be located in an area well served by multiple public transportation options and in a walkable environment, which would substantially reduce VMT and transportation-related GHG emissions.
Preparedness and Resiliency	Prepare for natural disasters and decrease vulnerability to climate change.	**Consistent**. The Project would be constructed to meet or exceed City requirements for fire, earthquake, and other building safety standards.
Focus Area: Equity		
Air Quality	Healthy air to breathe.	**Consistent**. The Project would implement emissions reductions measures during construction and operations, such as complying with fugitive dust control measures included in SCAQMD Rule 403.
Urban Ecosystem	Have access to parks, open space, including a revitalized Los Angeles River Watershed.	**Consistent**. The Project would be located approximately 0.53 miles from Warner Center Park, which is located at 5800 Topanga Canyon Boulevard. Other nearby parks and recreation areas include the Woodland Hills Recreation Center located at 5858 Shoup Avenue and less than two miles from the Project, the Woodland Hills Country Club located at 21150 Dumetz Road and less than two miles from the Project, and Serrania Avenue Park located at 20865 Wells Drive and less than two miles from the Project.
Livable Neighborhoods	Live in safe, vibrant, well-connected, and healthy neighborhoods.	**Consistent**. The Project would be consistent with nearby vibrant, safe, and well-connected neighborhoods. The Project would provide landscaping that would complement the aesthetic character of the Project Site and enhance its relationship to surrounding buildings. All of the open space areas would have extensive landscaping and well-detailed hardscape. All open space and pedestrian areas, such as internal streets and sidewalks, Publicly Accessible Open Space and Pedestrian Adapted Pathways, would be well-lit for security.

SOURCE: City of Los Angeles, Sustainable City pLAn, 2008; ESA 2018.

City of Los Angeles Green Building Code

The Project would comply with the City's Green Building Code (which incorporates the CALGreen Code with specific City amendments) to reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, installing energy-efficient appliances and equipment, and complying with 2016 California Title 24 Building Energy

Efficiency Standards, as amended by the City, or future applicable standards. The Project would also meet the mandatory measures of the CALGreen Code, as amended by the City, by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The heating, ventilation, and air conditioning (HVAC) system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Therefore, the Project would be consistent with the City's Green Building Code and the CALGreen Code.

Consistency with Executive Orders S-3-05 and B-30-15

At the State level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (HSC Division 25.5). As discussed above, the Project would not conflict with implementation of the Climate Change Scoping Plan strategies and regulations (refer to Table B-10 above) to reduce GHG emissions as required by HSC Division 25.5. Therefore, the Project does not conflict with this component of the Executive Orders.

The Executive Orders also establish the goals to reduce GHG emissions to 40 below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. In order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. These are Statewide efforts that are beyond the scope of a single project. In its *Climate Change Scoping Plan*, CARB acknowledged that the "measures needed to meet the 2050 goal are too far in the future to define in detail."[85] In the First Update, however, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."[86]

The Climate Change Scoping Plan recognizes that HSC Division 25.5 establishes an emissions reduction trajectory that will allow California to achieve the more stringent 2050 target: "These [greenhouse gas emission reduction] measures also put the state on a path to meet the long-term 2050 goal of reducing California's greenhouse gas emissions to 80 percent below 1990 levels. This trajectory is consistent with the reductions that are needed globally to stabilize the climate."[87] Also, CARB's First Update provides that it "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,"

85 California Air Resources Board, Climate Change Scoping Plan, December 2008, page 117, https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed April 2018.

86 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, page 32.

87 California Air Resources Board, Climate Change Scoping Plan, December 2008, page 15, https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed April 2018.

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, as follows:[88, 89]

- **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.[90] Further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[91]
- **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.[92]
- **Water Sector:** The Project's emissions level would be reduced as a result of further enhancements to water conservation technologies.[93]
- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste would reduce the Project's emissions level.[94]

Under AB 398, the Cap-and-Trade Program is scheduled to extend until 2030. The "recommended action" in the First Update to the Climate Change Scoping Plan 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."[95]

In addition to CARB's First Update, in January 2015 during his inaugural address, Governor Jerry Brown expressed a commitment to achieve "3 ambitious goals" that he would like to see accomplished by 2030 to reduce the State's GHG emissions: (1) increasing the State's Renewables Portfolio Standard from 33 percent in 2020 to 50 percent in 2030; (2) cutting the petroleum use in cars and trucks in half; and (3) doubling the efficiency of existing buildings and making heating fuels cleaner.[96] These expressions of Executive Branch policy may be manifested in adopted legislative or regulatory action through the state agencies and departments responsible for

88 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, page 4. See also pages 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.").

89 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, Table 6: Summary of Recommended Actions by Sector, pages. 94-99.

90 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, pages 37-39, 85

91 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, pages 40-41.

92 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, pages 55-56.

93 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, page 65.

94 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, page 69.

95 California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, page 98.

96 Los Angeles Times, Transcript: Governor Jerry Brown's January 5, 2015, Inaugural Address, http://www.latimes.com/local/political/la-me-pc-brown-speech-text-20150105-story.html. Accessed April 2018.

achieving the State's environmental policy objectives, particularly those relating to global climate change. As an example, the Governor signed into law SB 350 (Chapter 547, Statues of 2015), which increased the Renewables Portfolio Standard to 50 percent by 2030 and included interim targets of 40 percent by 2024 and 45 percent by 2027.

Since the WC2035 Plan FEIR was published in 2012, CARB has adopted the 2017 Scoping Plan. According to the 2017 Scoping Plan, California is on track to meet its 2050 GHG reduction target as specified in S-3-05.[97] The State's existing and proposed regulatory framework identified in the 2017 Scoping Plan can allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and puts the State on a trajectory to meet the target of reducing GHG emissions 80 percent below 1990 levels by 2050. According to the 2017 Scoping Plan, reductions needed to achieve the 2030 target are expected to be achieved by targeting specific emission sectors, including those sectors that are not directly controlled or influenced by the Project, but nonetheless contribute to project-related GHG emissions. For instance, Project-related emissions would decline pursuant to adopted state regulations as utility providers and transportation fuel producers are subject to renewable energy standards (i.e., SB 350), Cap-and-Trade, and the Low Carbon Fuel Standard (LCFS).[98] In addition, Project-related emissions would decline if the State or federal government adopts more stringent motor vehicle emissions standards for cars and trucks in the future.[99]

On July 17, 2017 the California legislature passed Assembly Bill 398, extending the Cap-and-Trade program through 2030. The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 and 2030 statewide emission limits will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on a cumulative basis. 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. In other words, the Cap-and-Trade Program functions similarly to an insurance policy for meeting California's GHG emissions reduction mandates.

The 2017 Scoping Plan does not provide an exact regulatory and technological roadmap to achieve the State's long term 2050 GHG reduction goal of 80 percent below 1990 levels. However, studies have 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 2050 targets.[100] For example,

97 California Air Resources Board, 2017 Climate Change Scoping Plan, p. 9, November 2017.

98 California Air Resources Board, 2017 Climate Change Scoping Plan, Table 1, p. 25, November 2017.

99 Ibid, p. 25.

100 Energy + Environmental Economics (E3), Summary of the California State Agencies' PATHWAYS Project: Long-Term Greenhouse Gas Reduction Scenarios, April 2015; Greenblatt, Jeffrey, "Modeling California Impacts on Greenhouse Gas Emissions," Energy Policy, Vol. 78, pages 158-172. The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80% below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved as well as the

while the 2017 Scoping Plan states some policies are not feasible at this time, such as Net Zero Carbon Buildings, potential future adoption and implementation of this type of policy as technology improves may be necessary to meet the 2050 target.

With Statewide efforts underway to facilitate the State's achievement of the Statewide GHG reduction goals, it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Orders' goals.

For all the reasons discussed above, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the establishment of the 2030 and 2050 targets. Therefore, as the Project would be consistent with the applicable plans, policies and regulations adopted by the State and the City for the purpose of reducing GHG emissions. Therefore, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs and the impact would be less than significant.

Project-Level Greenhouse Gas Emissions

The Climate Action Registry General Reporting Protocol provides procedures and guidelines for calculating and reporting GHG emissions from general and industry-specific activities. Although no numerical thresholds of significance have been adopted, and no specific protocols are available for land use projects, the General Reporting Protocol provides a framework for calculating and reporting GHG emissions from the Project. The GHG emissions analysis in this section is consistent with the General Reporting Protocol framework. For the purposes of this Tiered IS, total GHG emissions from the Project were quantified to provide information to decision makers and the public regarding the level of the Project's annual GHG emissions. The General Reporting Protocol recommends separating GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include 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.[101]

For purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions resulting from Project-related incremental (net) increases in the use of on-road mobile vehicles, electricity, and natural gas compared to existing conditions. This includes Project construction activities such as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG emissions from water

mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.

101 Embodied energy includes energy required for water pumping and treatment for end-uses. Third-party vehicles include vehicles used by hotel guests and other visitors of the Project Site.

conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis.

The General Reporting Protocol provides a range of basic calculation methods. However, they are typically designed for existing buildings or facilities and are not directly applicable to planning and development situations where the buildings or facilities do not yet exist. As a result, this section relies on calculation guidance from state and regional agencies with scientific expertise in quantifying GHG emissions, such as CARB and the SCAQMD. GHG emissions are estimated using the California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[102]

Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis (see Section 4.2, Air Quality, of this Draft EIR) to generate GHG emissions values for each construction year. The SCAQMD guidance, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, recognizes that construction-related GHG emissions from projects "occur over a relatively short-term period of time" and that "they contribute a relatively small portion of the overall lifetime project GHG emissions."[103] The guidance recommends that construction project GHG emissions should be "amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies."[104] In accordance with SCAQMD guidance, GHG emissions from construction have been amortized over the 30-year lifetime of the Project.

Operational emissions are also estimated using the CalEEMod software and CARB's on-road vehicle emissions factor (EMFAC2014) model on-road emissions factor model. CalEEMod was used to estimate GHG emissions from electricity, natural gas, solid waste, water and wastewater, fireplaces, and landscaping equipment. With regard to energy demand, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions.

102 South Coast Air Quality Management District, California Emissions Estimator Model (CalEEMod), http://www.aqmd.gov/caleemod/.

103 South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, 2008, page 3-9, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf. Accessed May 2018.

104 Ibid., page 3-8.

Emission factors for GHGs due to electrical generation to serve the demands of the existing Project Site were from the local utility provider, LADWP.

For mobile sources, CalEEMod was used to generate the VMT from the existing and Project uses based on the trip rates in the Traffic Volume Review (see Appendix K to this Tiered IS). The estimated VMT takes into account trip reductions from implementation of the TDM program pursuant to Section 7.8 of the WC2035 Plan. The estimated VMT also takes into account a TOD adjustment, which is based on mode choice distributions to account for walking, biking, and transit trip generation for the WC2035 Plan area and included in the WC2035 Plan FEIR. (WC2035 Plan DEIR, p. 4.12-37). Other trip reductions accounted for include pass-by trips, which are trips not originally destined to the Project Site but already on the street network, and internal capture, which are trip reductions from interaction among adjacent land uses such as residents walking to an adjacent land use.

GHG emissions from solid waste disposal are calculated using CalEEMod software. The emissions are based on the waste disposal rate for the land uses, the waste diversion rate, and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for CH_4, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery) are statewide averages and are used in this assessment.

GHG emissions from water and wastewater are due to the required energy to supply, distribute and treat. Wastewater also results in emissions of GHGs from wastewater treatment systems. Emissions are calculated using CalEEMod, the electrical intensity factors for water supply, treatment, and distribution and for wastewater treatment, the GHG emission factors for the electricity utility provider, and the emission factors for the wastewater treatment process.

Other sources of GHG emissions from operation of the Project include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod software uses landscaping equipment GHG emission factors from the CARB OFFROAD model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)*.[105]

The Project's GHG emissions are quantified based on the Project-related incremental increase in GHG emissions compared to existing conditions.

Existing Site Greenhouse Gas Emissions

The Project Site is currently developed with a contemporary corporate office park (known as Warner Center Corporate Park), consisting of 12 low-rise commercial structures (Existing Buildings), each on a distinct parcel, ranging in height from one to three stories, supported by surrounding surface parking lots. The Existing Buildings include approximately 340,339 square

[105] California Air Resources Board, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, June, 13, 2003, http://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_act.pdf. Accessed March 2018.

feet of floor area. GHG emissions are currently associated with vehicle trips to and from the Project Site (on-road mobile sources), onsite combustion of natural gas for heating and cooking, onsite combustion emissions from landscaping equipment (area source), offsite combustion of fossil fuels for electricity, and offsite emissions from solid waste decomposition, water conveyance, and wastewater treatment.

The existing GHG emissions related to the Project Site are summarized in **Table B-14**, *Existing Site Greenhouse Gas Emissions*. As shown, the existing GHG emissions are 7,328 MTCO2e per year and the primary sources of emissions are from transportation, which accounts for approximately 43 percent of the total, and energy demand (electricity and natural gas), which also accounts for approximately 43 percent of the total.

TABLE B-14
EXISTING SITE GREENHOUSE GAS EMISSIONS

Emissions Sources	CO_2e (Metric Tons per Year) [a,b]
Existing Site	
On-Road Mobile Sources	3,122
Area Sources	<1
Electricity	3,156
Natural Gas	270
Water Conveyance and Wastewater Treatment	726
Solid Waste	53
Total	**7,328**

[a] Totals may not add up exactly due to rounding in the modeling calculations.

[b] CO_2e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report.

SOURCE: ESA 2018.

Project Construction Emissions

The emissions of GHGs associated with construction of the Project were calculated for each year of construction activity using CalEEMod. Results of the GHG emissions calculations are presented on **Table B-15**, *Unmitigated Construction Greenhouse Gas Emissions*. It should be noted that the GHG emissions shown in Table B-15 are based on construction equipment operating continuously throughout the work day. In reality, construction equipment tends to operate periodically or cyclically throughout the work day. Therefore, the GHG emissions shown reflect a conservative estimate. A complete listing of the equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets that are provided in Appendix F.

Although GHGs generated during construction are accordingly considered one-time emissions, it is important to include them when assessing all of the long-term GHG emissions associated with a project. The SCAQMD recommends that construction-related GHG emissions be amortized over a

project's 30-year lifetime in order to include these emissions as part of a project's annualized lifetime total emissions, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. In accordance with this methodology, the estimated Project's construction GHG emissions have been amortized over a 30-year period and are included in the annualized operational GHG emissions.

Due to the potential persistence of GHGs in the environment, for the purposes of this project-specific analysis, impacts are based on annual emissions and, in accordance with SCAQMD methodology, amortized construction-period emissions are added to the operational-period emissions, which are discussed in the next section.

TABLE B-15
UNMITIGATED CONSTRUCTION GREENHOUSE GAS EMISSIONS

Emission Source	Construction Year [a]	CO_2e (Metric Tons per Year) [b, c]
Phase 1	2019	289
Phase 1	2020	1,492
Phase 1	2021	1,354
Phase 1 + Phase 2	2022	1,153
Phase 2 + Phase 3	2023	1,826
Phase 3	2024	1,439
Phase 4	2028	708
Phase 4 + Phase 5 + Phase 6	2029	815
Phase 5 + Phase 6	2030	1,334
Phase 7	2032	1,119
Phase 7	2033	140
Phase 8	2034	1,777
Phase 8	2035	956
	Total Construction Emissions	**14,402**
	Amortized Construction Emissions (30-years)	**480**

[a] The Project would be developed based on market conditions. Based on reasonably foreseeable information, it is anticipated that there may be gaps between the development of some phases.

[b] Totals may not add up exactly due to rounding in the modeling calculations.

[c] The emissions were estimated assuming construction begins at the earliest possible date (2019). This provides for a conservative emissions estimate as emission factors decline in future years. Project construction may commence at a later date, which would generally result in similar or reduced emissions, primarily due to vehicles meeting more stringent emissions standards. If construction starts at a later date, however, the emissions would be similar or reduced compared to the emissions reported.

SOURCE: ESA 2019.

Project Operational Emissions

GHG emissions associated with operation of the Project were calculated to disclose operational emissions from the Project and were estimated using the CalEEMod model. The Project is designed to include green building techniques and other sustainability features. The Project must comply with the portions of City's Green Building Code applicable to mixed-use/commercial development.

In addition, physical and operational Project characteristics for which sufficient data is available to quantify the reductions from building energy and resource consumption have been included in the quantitative analysis, and include the following measures: installation of energy efficient appliances; low-water fixtures; water efficient irrigation; and building energy usage consistent with the current California Title 24-2016 Building Energy Efficiency Standards.

Maximum annual net GHG emissions resulting from motor vehicles, energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, and solid waste were calculated for the expected opening year (2035) when all components of the Project would be operational. The maximum opening year GHG emissions from operation of the Project are shown in **Table B-16**, *Annual Greenhouse Gas Emissions*.

TABLE B-16
ANNUAL GREENHOUSE GAS EMISSIONS

Emissions Sources	Project CO_2e (Metric Tons per Year) [a,b]
Existing Site (refer to Table B-14)	**7,328**
Project Operational	
On-Road Mobile Sources	16,378
Area	18
Electricity	16,719
Natural Gas	1,998
Water Conveyance and Wastewater Treatment	3,123
Solid Waste	275
Construction (Amortized) (refer to Table B-15)	480
Proposed Subtotal	38,991
Net Operational (Project – Existing)	31,663

[a] Totals may not add up exactly due to rounding in the modeling calculations.

[b] The operational emissions were estimated in CalEEMod and EMFAC2014 using model runs set for year 2035, assuming construction begins at the earliest possible date (2019). This provides for a conservative emissions estimate as emission factors, particularly for fleet-wide motor vehicles, decline in future years.

SOURCE: ESA 2019.

Conclusion

In summary, the GHG emissions analysis provided above and the Project's consistency with applicable regulatory plans and policies to reduce GHG emissions demonstrates that the Project would substantially comply with or exceed the GHG reduction actions and strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2016 RTP/SCS, and the GreenLA Plan, Sustainable City pLAn and Green Building Code. The Project would result in reduced vehicle trips and resulting VMT as analyzed in the Traffic Volume Review (see Appendix K to this Tiered IS). Project-related trips and VMT would be reduced from implementation of the TDM program, the

TOD characteristic of the Project, pass-by trips, and internal capture. The Project would implement energy efficiency and conservation Mitigation Measures AQ-22, U-4 through U-8, and U-14. Implementation of these energy and water efficiency and conservation measures would contribute to reductions in GHG emissions from energy consumption and from the energy used to supply and convey water to the Project.

Furthermore, according to the 2017 Scoping Plan, reductions needed to achieve the 2030 target are expected to be achieved by targeting specific emission sectors, including those sectors that are not directly controlled or influenced by the Project, but nonetheless contribute to project-related GHG emissions. Project-related emissions would decline pursuant to adopted state regulations as utility providers and transportation fuel producers are subject to renewable energy standards (i.e., SB 350), Cap-and-Trade, the LCFS, and if the State or federal government adopts more stringent motor vehicle emissions standards for cars and trucks in the future. Thus, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the establishment of the 2030 and 2050 targets and the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

8. Hazards and Hazardous Materials

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) determined that the WC2035 Plan area is occupied by a wide range of land uses, including commercial and industrial uses that may involve the use and storage of potentially hazardous substances. Groundwater in the WC2035 Plan area may contain volatile organic compounds (VOCs) from the former Rocketdyne facilities and leaking underground storage tanks approximately 200 feet south of Sherman Way. However, neither of these facilities is located in the vicinity of the Project Site. The hazardous material and waste database survey prepared in connection with the WC2035 Plan DEIR identified numerous recognized environmental concerns (RECs) within two miles of the WC2035 Plan area, although the specific locations of these facilities were not identified. (WC2035 Plan DEIR, pp. 4.6-2-3)

The Woodlands Hills Academy and Canoga Park High School were identified as sensitive receptors within 0.25 mile of the WC2035 Plan area. Woodland Hills Academy is located at 20800 Burbank Boulevard, approximately 0.1 mile southeast of the Project Site. Canoga Park Senior High School is located at 6850 Topanga Canyon Boulevard, approximately 1.3 miles northwest of the Project Site. Hart Elementary School is located 0.3 mile north of the Los Angeles River, just outside the WC2035 Plan area, approximately 1.4 miles from the Project Site. The Kaiser Permanente Woodland Hills Medical Center, which is located at 5601 De Soto Avenue, approximately 0.15 mile from the Project Site, was identified as a sensitive receptor. The WC2035 Plan FEIR also identified residential areas generally located throughout the WC2035 Plan area as sensitive receptors. The WC2035 Plan area was not identified as being within a two-mile radius of an airport. Similarly, the WC2035 Plan was not identified as being located within a wildlands fire area. (WC2035 Plan DEIR, pp. 4.6-3-4)

Construction

The WC2035 Plan FEIR determined that the construction of individual projects within the WC2035 Plan area could result in the passage of trucks carrying hazardous materials that could pass within 0.25 mile of schools or a hospital. The WC2035 Plan FEIR also recognized that project construction may result in the spill or release of hazardous materials, and a potentially short-term adverse significant impact related to the transport of hazardous materials could occur. It was also found that construction of the individual development projects could impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan. During construction, temporary detours and/or road closures may be required, resulting in localized increase in traffic and circuitous traffic routes. These activities were concluded to result in short-term adverse and significant impacts on the implementation of an evacuation plan. To address the potentially significant construction impacts during associated with individual development projects that are related to hazards and hazardous materials, the WC2035 Plan FEIR recommended several mitigation measures that would reduce those potentially significant impacts to a less than significant level, as further discussed below. (WC2035 Plan DEIR, pp. 4.6-5-6)

Operations

The WC2035 Plan FEIR concluded that proposed land uses would likely require the use of some chemicals (e.g., household and industrial cleaners, solvents, etc.) that are considered hazardous; however, all hazardous materials used and/or generated from onsite land uses would comply with applicable local, state and federal regulations concerning their storage, handling and disposal. Similarly, the transportation of hazardous materials would also be subject to these relevant regulations and only vendors licensed in the handling, transportation and disposal of these materials would be utilized by businesses permitted to deliver these materials within the City. Therefore, impacts associated with the use, transportation and disposal of hazardous materials would be less than significant. It also determined that development within the WC2035 Plan area would not impact implementation of or physically interfere with an adopted emergency response plan or evacuation plan. (WC2035 Plan DEIR, pp.4.6-6-7)

Notwithstanding that the WC2035 Plan FEIR determined that all operational impacts from development within the WC2035 Plan area with respect to hazards and hazardous materials would be less than significant, it recommended several mitigation measures that relate in part to such operational impacts, presumably to ensure that any such operational impacts associated with individual projects would be less than significant.

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended the following five mitigation measures (WC2035 Plan FEIR, pp. V-16-17), designated below as WC-HAZ-1 through WC-HAZ-5, with respect to potentially significant impacts and less than significant impacts related to hazards and hazardous materials that are potentially applicable to the Project:

WC-HAZ-1: The City shall require that individual projects conduct a Phase 1 Environmental Site Assessment to identify any hazardous

materials/wastes that could be present on each project site. The Phase 1 will also include recommendations and measures for further site assessment (Phase 2) and mitigation (Phase 3) to address any hazardous materials/wastes potentially present on each site including any asbestos and lead-based paint.

WC-HAZ-2: The City shall require that a Phase 2 Site Assessment be conducted as may be indicated by the site-specific Phase 1 Environmental Site Assessment. Should the Phase 2 Site Assessment indicate contamination a Phase 3 Mitigation Plan shall be designed and implemented to the satisfaction of the appropriate regulatory agency (DTSC, LARQCB, LAFD or other regulatory agency as appropriate).

WC-HAZ-3: The City shall require that each project applicant and/or contractor ensures that no hazardous materials are transported along Topanga Canyon Boulevard or Burbank Boulevard or within one-quarter mile of a school.

WC-HAZ-4: The City shall require that each applicant and/or contractor coordinate in advance of construction with the City of Los Angeles Department of Transportation and Fire Department to ensure that road closures (temporary or permanent) are identified and that alternate access and evacuation routes are determined in the event of an emergency and/or natural disaster.

WC-HAZ-5: The City shall ensure that any construction site and/or permanent facility storing hazardous materials comply with applicable regulations regarding storage, transport and disposal of hazardous materials and wastes.

In connection with the environmental review for the Project, two technical reports have been prepared with respect to the environmental condition of the Project Site: (1) Phase I Environmental Assessment of Warner Center I: 20935, 20955, 20100, and 20131 Warner Center Lane (Warner Center I Phase I ESA) and (2) Phase I Environmental Assessment of Warner Center II: 20920, 20950, 20970, and 20151 Warner Center Lane and 20931, 20951, 20971, and 21041 Burbank Boulevard (Warner Center II Phase I ESA), both of which are dated May 10, 2013, were prepared by Property Solutions Incorporated (Property Solutions) and are included as Appendix G to this Tiered IS (collectively, Phase 1 ESAs).

Mitigation Measure WC-HAZ-1 has been satisfied by the preparation of the Phase 1 ESAs. As discussed further below, in accordance with Phase 1 ESAs, prior to renovation or demolition of buildings containing asbestos, contractors licensed to conduct asbestos abatement work must be retained. Asbestos abatement contractors must follow state regulations contained in 8 CCR 1529, and 8 CCR 341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. The SCAQMD and the California Occupational Safety and Health Administration (Cal-OSHA) must be notified 10 days prior to initiating construction and demolition activities. Asbestos encountered during demolition of an existing building must be transported and disposed of at an appropriate facility. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Section 19827.5 of the California Health and Safety Code, adopted January

1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos.

As discussed below, Mitigation Measures WC-HAZ-3, WC-HAZ-4 and WC-HAZ-5 are recommended below as mitigation measures for the Project.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts from hazards and hazardous materials, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

Would the project:

(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact with Mitigation Incorporated. Project construction activities would result in a temporary increase in the use of typical construction materials at the Project Site, including concrete, hydraulic fluids, paints, cleaning materials, and vehicle fuels. The use of these materials during Project construction would be short-term in nature and would occur in accordance with standard construction practices, as well as with applicable federal, state, and local regulations.

The WC2035 Plan FEIR concluded that, with the implementation of Mitigation Measure WC-HAZ-5, potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. In addition, these activities would be short-term with respect to each Project phase. Therefore, construction activities would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant. (WC2035 Plan DEIR, pp. 4.6-5-6)

The operation of residential, retail, office, hotel, and residential uses associated with the Project would require the use of minimal amounts of hazardous materials for routine cleaning and maintenance. These hazardous materials include small quantities of commercially available cleaning solutions, solvents, and pesticides. Additionally, Project operation would require the use of limited amounts of hydraulic fluid in the elevator equipment and limited quantities of refrigerant in the Heating, Ventilation and Air Conditioning (HVAC) system.

The WC2035 Plan FEIR concluded that, with implementation of Mitigation Measure WC-HAZ-5, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Through compliance with existing federal, state, and local regulations, the transport, use, and storage of these materials would not pose a significant hazard to the public or the environment in the 2035 Plan area (which includes the Project Site). (WC2035 Plan DEIR, pp. 4.6-5-6)

Therefore, with implementation of Mitigation Measure WC-HAZ-5, development of the proposed Project would result in a less than significant impact to the public and environment through the routine transport, use, or disposal of hazardous materials. This impact was adequately addressed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR).

(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact with Mitigation Incorporated. The following discussion of hazardous materials is based, in part, on the Phase 1 ESAs. Based on the analysis and conclusions in the Phase 1 ESAs, a Phase 2 site assessment is not required. As set forth in the Phase 1 ESAs, the Project Site and adjoining properties consisted predominantly of orchards or citrus groves, based on aerial photographs from 1928, 1938, 1939, 1947, 1956, 1965, and 1976. Because petroleum-based pesticides were commonly used on agricultural land in California at that time, residual soil contamination may have been present on the Project Site. However, the potentially contaminated shallow soils were likely removed in preparation for development of the Existing Buildings in 1981, 1982, and 1984. Therefore, the redevelopment of the Project Site would not result in the release of petroleum-based pesticides into the environment.

As discussed in the Phase 1 ESAs, there is no evidence of recognized environmental conditions (RECs) in connection with the Project Site. However, based on the dates of construction of the Existing Buildings (1981, 1982, and 1984), asbestos-containing materials (ACMs) may be present. Suspect ACMs in the Existing Buildings include acoustic ceiling panels, drywall, and joint compound, all of which were observed to be in an overall undamaged condition. The asbestos would not be exposed to people and would not present a health risk unless it is damaged or disturbed. While the ACMs were not considered to be a significant environmental concern, removal of ACMs would be subject to SCAQMD and Cal-OSHA requirements to ensure proper handling, notification, and disposal by a licensed asbestos abatement contractor prior to any interior demolition or renovation within the buildings containing ACMs. Project construction would require the remediation of buildings and equipment identified as having ACMs. Remediation of these materials would be conducted by qualified professionals in accordance with regulations governing these activities.

As discussed in the Warner Center I Phase 1 ESA, the adjacent property located at 5825 De Soto Avenue (California Highway Patrol) was listed in multiple databases, including the Leaking Underground Storage Tank (LUST), Underground Storage Tank (UST), California Facility Inventory Database (CA FID UST), Historical UST (HUST), and the Statewide Environmental Evaluation and Planning System USF (SWEEPS UST) databases for registered underground storage tanks. The tanks include gasoline and waste oil, but based on the information in all of the databases, the potential for impact is low or non-existent due to the current case closed status.

As discussed in the Warner Center II Phase 1 ESA, the adjacent property located at 20940 Burbank Boulevard (Kaiser Permanente Woodland Hills Medical Center) is listed in multiple databases, include the LUST, CA FID UST, SWEEPS UST, and Cortese database for a registered underground

storage tank. The tank contained gasoline, but the potential for impact is low or non-existent due to the case closed status.

As stated in both of the Phase 1 ESAs, Property Solutions noted that no USTs or above-ground storage tanks (ASTs) were observed during the Project Site visits. Additionally, no polychlorinated biphenyl (PCB) electrical equipment was observed onsite, and is unlikely to be present onsite based on the date of construction of the Existing Buildings. Mechanical rooms for the hydraulic elevators showed no evidence of a release of hydraulic fluid. Additionally, no wells or sumps were observed during the site visits. No stains were observed surrounding floor drains, and no chemical storage was observed in proximity of the floor drains. Pits consisting of concrete construction were located beneath the hydraulic elevators, but no staining was observed near or around the pits. No impacts in regards to radon, lead-based paint, or lead in drinking water were observed on the Project Site.

Based on the information above and the observations of Property Solutions set forth in the Phase 1 ESAs, there is no evidence of RECs on the Project Site. Additionally, no RECs were identified with respect to neighboring properties that would affect the Project Site.

Therefore, based on the information and findings in the Phase 1 ESAs, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and the impact would therefore be less than significant. This impact was adequately addressed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR).

(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact with Mitigation Incorporated. The Project Site is located within 0.25 mile of the following schools: (1) Woodland Hills Academy Middle School (previously Parkman Middle School), located at 20800 Burbank Boulevard approximately 0.1 miles southeast of the Project Site; and (2) Tutor Time of Woodland Hills, located at 5855 De Soto Avenue approximately 0.1 mile north of the Project Site. As stated in the Analysis in WC2035 Plan FEIR, above, and the WC2035 Plan FEIR, Project construction could also result in trucks carrying hazardous materials passing within 0.25 mile of schools. (W2035 Plan DEIR, p. 4.6-5)

Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Any hazardous emissions from the use of such materials would be minimal and localized to the Project Site.

With the implementation of Mitigation Measure WC-HAZ-3, the construction of 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, and this impact would be less than significant. This impact was adequately addressed in the WC2035 Plan FEIR.

(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 create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?

No Impact. The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) determined that groundwater in the WC2035 Plan area may contain VOCs from the former Rocketdyne facilities and leaking underground storage tanks approximately 200 feet south of Sherman Way. However, neither facility is located in the vicinity of the Project Site. (WC2035 Plan DEIR, p. 4.6-2)

In addition, the Phase 1 ESAs reviewed multiple reports and databases as part of their environmental assessment of the Project Site. Property Solutions utilized Environmental Data Resources, Inc. (EDR) as an information source for regulatory agency environmental database records. As stated above in Section 8(b), the Project Site is not listed in any of the environmental databases. A comprehensive list of all databases reviewed can be found in Appendix J to the Warner Center I Phase 1 ESA, which is included in Appendix G to this Tiered IS.

Therefore, the Project is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 that, as a result, would create a significant hazard risk to the public or the environment caused in whole or in part from the Project's exacerbation of existing environmental conditions, and this impact was adequately addressed in the WC2035 Plan FEIR.

(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. As discussed above, and in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), the Project Site is not located within an airport land use plan and is not located within two miles of an airport. The nearest airport is the Bob Hope Airport, located approximately 13 miles east of the Project Site (WC2035 Plan DEIR, p. 4.6-4). Therefore, the Project would have no impact regarding airport-related safety hazards for people residing or working in the vicinity of the Project, and this impact was adequately addressed in the WC2035 Plan FEIR.

(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. As discussed above in Section 8(e) and in the WC2035 Plan FEIR, there are no private airstrips in the vicinity of the Project Site, and the Project Site is not located within a designated airport hazard area. Therefore, the Project would have no impact regarding airport-related safety hazards for people residing or working in the vicinity of the Project, and this environmental topic was adequately addressed in the WC2035 Plan FEIR.

(g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact with Mitigation Incorporated. The Project Site is located in an established urban area that is well-served by a roadway network. Project operation would generate traffic would result in some modifications to the access points to the Project Site. As discussed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), the City's Department of Transportation (LADOT) and Fire Department (LAFD) would be responsible for ensuring that the Project would not impair or physically interfere with an adopted emergency response or evacuation plan. This would be accomplished in a number of ways, including ensuring that the Project provides adequate access and escape routes (clearly marked and delineated) available for the residents and patrons, and that they are aware of emergency evacuation plans in the event of a major emergency/catastrophe. (WC2035 Plan DEIR, pp. 4.6-6-7)

Based on the foregoing, the WC2035 Plan FEIR concluded that the Project would have a less than significant impact with respect to emergency response or evacuation plans. However, to further reduce this less than significant impact, the WC2035 Plan FEIR includes Mitigation Measure HAZ-4, which requires each project applicant and/or contractor to coordinate with LADOT and LAFD to ensure that road closures are identified and that alternate access and evacuation routes are determined in the event of an emergency and/or natural disaster.

Therefore, with or without the implementation of Mitigation Measure HAZ-4, the Project's potential impairment to the implementation of or physical interference with an adopted emergency response or evacuation plan in the WC2035 Plan area (which includes the Project Site) would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

(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 caused in whole or in part from the project's exacerbation of existing environmental conditions?

No Impact. As stated in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), the WC2035 Plan area (which includes the Project Site) is not located in a wildlands fire area (WC2035 Plan DEIR, p. 4.6-4). The Project would be designed to, and its operations implemented in a manner that would, comply with applicable State and local codes and ordinances, including those in the City's Department of Public Works street standards related to construction requirements, and Division 7 of the City's Building Code regarding provision of fire-resistant building materials and smoke control. Therefore, the Project would have no impact regarding the exposure of people or structures to a significant loss, injury or death involving wildland fires, and this impact was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following mitigation measures from the WC2035 Plan FEIR are recommended for the Project to further reduce the less than significant impacts related to hazards and hazardous materials (these mitigation measures have been non-substantively modified to apply specifically to the Project):

HAZ-3: The Applicant and/or contractor shall ensure that no hazardous materials are transported along Topanga Canyon Boulevard or Burbank Boulevard or within one-quarter mile of a school.

HAZ-4: The Applicant and/or contractor shall coordinate in advance of construction with the City of Los Angeles Department of Transportation and Fire Department to ensure that road closures (temporary or permanent) are identified and that alternate access and evacuation routes are determined in the event of an emergency and/or natural disaster.

HAZ-5: Each construction site and/or permanent facility storing hazardous materials shall comply with applicable regulations regarding storage, transport and disposal of hazardous materials and wastes.

9. Hydrology and Water Quality

Analysis in WC2035 Plan FEIR

As discussed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), the WC2035 Plan area is located within the San Fernando Valley Groundwater Basin (SFVGB), which is bounded on the north and northwest by the Santa Susana Mountains, on the north and northeast by the San Gabriel Mountains, on the east by the San Rafael Hills, on the south by the Santa Monica Mountains and Chalk Hills, and on the west by the Simi Hills. The San Fernando Valley is drained by the Los Angeles River and its tributaries. The WC2035 Plan FEIR identified the WC2035 Plan area as being within the Los Angeles River Watershed, which is the receiving water body for stormwater facilities in the WC2035 Plan area. It described the Los Angeles River as more of a flood damage reduction channel, rather than a natural river system, as 37 of its 51 miles have hardened banks and are lined with concrete bottoms. The WC2035 Plan area was further identified as being within Reach 6 of the Los Angeles River (above the Sepulveda Flood Control Basin), which was identified as being impaired for a number of pollutants, including 1,1-dichloroethane (1,1-DCE), coliform bacteria, selenium, tetrachloroethylene (PCE), and trichloroethylene (TCE). (WC2035 Plan DEIR, pp. 4.7-1-2, 8)

Based on the Federal Emergency Management Agency (FEMA) flood insurance rate maps (FIRM), the WC2035 Plan FEIR stated that the WC2035 Plan area is not located within a designated flood plain, flood hazard zone, or regulatory floodway. Furthermore, based on the City's Safety Element, the WC2035 Plan area is not located within an area subject to inundation or tsunami hazard area. (WC2035 Plan DEIR, pp. 4.7-1, 7)

Construction

The WC2035 Plan FEIR noted that individual development projects would utilize machinery and earthmoving equipment during the initial preparation of each construction site that could generate dust and would require the use of water trucks to meet SCAQMD fugitive dust requirements. It also noted that increased erosion and siltation could occur as a result of construction activities and the modification of existing drainage patterns. The use of water trucks to reduce dust could also increase the potential for urban pollutants and sediment to enter the Los Angeles River. Accidental onsite spills of hazardous materials (e.g., fuels, solvents, paints) could also enter ground and surface waters if not properly contained. (WC2035 Plan DEIR, pp. 4.7-15-16)

The WC2035 Plan FEIR acknowledged that most individual projects within the WC2035 Plan area would be developed on large lots and would disturb more than one acre of soil, and therefore would be subject to the State's National Pollutant Discharge Elimination System (NPDES) Construction General Permit (as required pursuant to Mitigation Measure WC-HYDRO-12, as discussed below). Accordingly, individual applicants and/or contractors would be required to prepare and implement a SWPPP to meet the requirements of the Construction General Permit. It also stated that all construction activities would be required to implement stormwater prevention measures identified in the SWPPP during all phases of construction. It concluded that adherence to a SWPPP and the implementation of standard best management practices (BMPs) during construction would reduce the potential for increased siltation, erosion, and hazardous materials spills. Accordingly, the WC2035 Plan FEIR determined that construction impacts associated with water quality would be less than significant. (WC2035 Plan DEIR, p. 4.7-16)

Notwithstanding that the WC2035 Plan FEIR determined that the water quality impact associated with construction activities within the WC2035 Plan area would be less than significant based on compliance with applicable regulations, it recommended several mitigation measures (in addition to WC-HYDRO-12) that relate to such impacts (as discussed below), to further ensure that such construction impacts associated with individual projects would be less than significant. (WC2035 Plan FEIR, pp. V-17-21)

Operation

The WC2035 Plan FEIR stated that the WC2035 Plan would not convert natural lands that provide or substantially contribute to ground water recharge. It also stated that buildout under the WC2035 Plan was not anticipated to include facilities or mechanisms capable of changing the rate or direction of flow of groundwater. However, because the WC2035 Plan area is located in an area of high groundwater, future construction of structures may require dewatering of subterranean levels. The WC2035 Plan FEIR acknowledged that the level of dewatering was unknown and would be determined on an individual project basis, but would not substantially reduce the overall groundwater level contained within the SFVGB. Therefore, the WC2035 Plan FEIR determined that impacts associated with the implementation of the WC2035 Plan on the groundwater levels would be less than significant. (WC2035 Plan DEIR, p. 4.7-16)

Recognizing the potential for water quality impacts from implementation of the WC2035 Plan, the WC2035 Plan FEIR required the preparation of project-specific hydrology and drainage studies for

individual development projects to determine anticipated flows to the existing onsite and offsite storm drain facilities and whether those flows could be accommodated by existing facilities. Based upon these studies, appropriate design features and/or BMPs (e.g., pipe size, pumping stations, etc.) would be required to address project-specific deficiencies. As such, the WC2035 Plan FEIR concluded that impacts on storm drain facilities would be less than significant. (WC2035 Plan DEIR, p. 4.7-16)

With regard to impacts associated with flood hazard, the WC2035 Plan FEIR stated that the WC2035 Plan area is not located within a flood plain, flood hazard zone or regulatory floodway, and it therefore concluded that impacts associated with the placement of housing within a 100-year flood hazard or the WC2035 Plan's ability to impede or redirect flood flows would be less than significant. (WC2035 Plan DEIR, p. 4.7-17)

With regard to the presence of streams and rivers within the WC2035 Plan area, the WC2035 Plan FEIR stated that the Los Angeles River runs directly north of the WC2035 Plan area. It also noted that widening of the Variel Bridge is identified as a transportation mitigation measure and would occur within the Los Angeles River. However, it determined that with proper engineering the proposed widening was not anticipated to modify the Los Angeles River and therefore, impacts would be less than significant. (WC2035 Plan DEIR, p. 4.7-17)

Finally, the WC2035 Plan FEIR determined that the WC2035 Plan area is not located within an area subject to levee or dam failure and therefore would not be subject to seiche, tsunami, or mudflow.

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended 14 mitigation measures, designated as WC-HYDRO-1 through WC-HYDRO-14, with respect to potentially significant impacts or less than significant impacts related to hydrology and water quality (WC2035 Plan FEIR, pp. V-17-21). The mitigation measures set forth below are potentially applicable to the Project. Mitigation Measure WC-HYDRO-14 encourages the daylighting of the Arroyo Calabasas, and relates specifically to the Topanga Plaza Shopping Center property and is therefore inapplicable to the Project Site and is not listed below.

WC-HYDRO-1: For development in the WCRCCSP *[sic]* area, the City shall require compliance with the Low Impact Development (LID) Ordinance. Construction contractors of individual projects shall be required to control erosion and runoff as necessary through the use of site appropriate grading practices. Specifically, the construction contractor shall plan for and implement Best Management Practices (BMPs) during construction to the satisfaction of the Department of Public Works, Bureau of Engineering, Stormwater Management Division City of Los Angeles, and/or other designated responsible agencies/departments. (LID measures also require review and approval of the Watermaster.)

WC-HYDRO-2: For development in the WCRCCSP *[sic]* area the City shall require structural design of individual projects to be modified when possible to avoid the need for a permanent dewatering system. When a permanent dewatering system is necessary, one or more of the following measures as per the Department of Building and Safety shall be followed:

- Pumping water to a beneficial use on site (landscaping, decorative fountains or lakes, toilet flushing, cooling towers); or
- Returning water to the groundwater basin by an injection well.

WC-HYDRO-3: For development in the WCRCCSP *[sic]* area the City shall require sufficient area to be available so that runoff can be collected in roadside vegetated swales as appropriate and directed to existing curb and gutter or storm drains. In other areas, runoff shall be collected in gutters and directed to the storm drain systems. Swale design shall be coordinated with on-site hazardous materials issues as necessary.

WC-HYDRO-4: For development in the WCRCCSP *[sic]* area the City shall require compliance with applicable NPDES permit requirements, including preparation and implementation of a Stormwater Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan (SUSMP) in accordance with the Los Angeles Municipal Storm Water permit. The SUSMP shall identify post development peak runoff, conserve natural areas, minimize storm water pollutants, protect slopes and channels, and post construction Best Management Practices (BMP) and other items as required by the permit. (SUSMP measures require review and approval of the Watermaster.)

WC-HYDRO-5: For development in the Specific Plan area the City shall require runoff from parking lots to be treated, as required by SUSMP regulations, prior to discharging into existing storm drain systems.

WC-HYDRO-6: The City shall require as conditions on *[sic]* project approval within the WCRCCSP *[sic]* area that all wastes from construction in the WCRCCSP *[sic]* area shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.

WC-HYDRO-7: The City shall require as conditions on project approval within the WCRCCSP *[sic]* area that leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

WC-HYDRO-8: The City shall prohibit, as a condition on project approval within the WCRCCSP *[sic]* area, material spills from being hosed down at the pavement. Dry cleanup methods shall be required wherever possible.

WC-HYDRO-9: The City shall require as conditions on project approval within the WCRCCSP *[sic]* area that dumpsters be covered and maintained. Uncovered dumpsters shall be required to be placed under a roof or covered with tarps or plastic sheeting.

WC-HYDRO-10: The City shall require as conditions on project approval within the WCRCCSP *[sic]* area that where truck traffic is frequent, gravel approaches and dirt tracking devices shall be used to reduce soil compaction and limit the tracking of sediment into streets.

WC-HYDRO-11: The City shall require as conditions on project approval within the WCRCCSP *[sic]* area that all vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be required to be conducted at an appropriate location. Drip pans or drop cloths shall be required to catch drips and spills.

WC-HYDRO-12: Short-term water quality impacts may result from the construction of the proposed project. Project construction shall comply with the General Construction Activity Stormwater Permit (General Permit) and the City's Development Construction Program pursuant to the NPDES Permit (Permit No. CA00401). Implementation of the General Permit and NPDES Permit programs will mitigate potential impacts to a level of insignificance.

WC-HYDRO-13: Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control, which requires the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. Applicants must meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board, including the following (a copy of the SUSMP can be downloaded at: (http://www.swrcb.ca.gov/rwqcb4/).

- The project applicant shall implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing 3/4 inch of rainfall in a 24 hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

- Post development peak stormwater runoff discharge rates shall not exceed the estimated predevelopment rate for developments where the increase peak stormwater discharge rate will result in increased potential for downstream erosion.
- Clearing and grading of native vegetation at the project site shall be limited to the minimum needed to build lots, allow access, and provide fire protection.
- Trees and other vegetation at each site shall be maximized by planning additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.
- Natural vegetation shall be promoted by using parking lot islands and other landscaped areas.
- Any identified riparian areas shall be preserved.
- Appropriate erosion control and drainage devices, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code will be incorporated.
- Outlets of culverts, conduits or channels from erosion by discharge velocities shall be protected by installing a rock outlet protection. Rock outlet protection is physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe. Sediment traps shall be installed below the pipe-outlet. Inspect, repair, and maintain the outlet protection after each significant rain.
- Any connection to the sanitary sewer will have authorization from the Bureau of Sanitation.
- Impervious surface area will be reduced by using permeable pavement materials where appropriate. These include pervious concrete/asphalt; unit pavers, i.e. turf block; and granular materials, i.e. crushed aggregates, cobbles.
- Roof runoff systems will be installed where site is suitable for installation.
- Messages that prohibit the dumping of improper materials into the storm drain system adjacent to storm drain inlets shall be painted.
- All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING - DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.
- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks within the project area.
- Legibility of stencils and signs must be maintained.

- Materials with the potential to contaminate stormwater must be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
- The storage area will be paved and sufficiently impervious to contain leaks and spills.
- The storage area shall have a roof or awning to minimize collection of stormwater within the secondary containment area.
- An efficient irrigation system shall be designed to minimize runoff including: drip irrigation for shrubs to limit excessive spray; shutoff devices to prevent irrigation after significant precipitation; and flow reducers.
- Cleaning of oily vents and equipment will be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.
- Trash dumpsters will be stored both under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids. Containers will be washed in an area with properly connected sanitary sewer.
- Wastes, including paper, glass, aluminum, oil and grease will be reduced and recycled.
- Liquid storage tanks (drums and dumpsters) will be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. A secondary containment system such as berms, curbs, or dikes shall be installed. Drip pans or absorbent materials whenever grease containers are emptied will be used.
- The owner(s) of the property will prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer's instructions.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts on hydrology and water quality, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

Would the project:

(a) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR, most individual development projects in the WC2035 Plan area are greater than one acre in size, would disturb more than one acre of soil, and would therefore be subject to the Construction General Permit, which requires that each individual applicant and/or its contractors prepare and implement a SWPPP. Therefore, all construction activities within the WC2035 Plan area would be required to implement the BMPs measures identified in the SWPPP during all phases of construction. Adherence to the SWPPP and implementation of BMPs during construction would reduce the potential impacts associated with water quality to less than significant levels. (WC2035 Plan DEIR, p 4.7-12-16)

With regard to operational impacts, the WC2035 Plan FEIR determined that implementation of the applicable Urban Design Guideline with respect to water treatment and detention capacity on a project-by-project basis would result in less than significant impacts associated with water quality. However, it subsequently stated that increased development, increased density, increased human activity including vehicular activity could potentially result in increased pollutants that could enter surface and groundwater. Therefore, the WC2035 Plan FEIR recommended a series of mitigation measures with respect to water quality and dewatering (WC-HYDRO-1 through WC-HYDRO-13) to ensure that the impacts of individual development projects on water quality and hydrology would be less than significant. (WC2035 Plan DEIR, p 4.7-16, WC2035 Plan FEIR, pp. V-17-21)

In order to confirm that the Project would not have a significant impact on water quality, Psomas, the project engineer, prepared a project-level hydrology and drainage study for the Project, titled *De Soto Ave. & Burbank Blvd. Project Surface Hydrology and Water Quality Technical Memorandum*, dated May 17, 2018 (Hydrology Report), included as Appendix H to this Tiered IS. The Hydrology Report reiterated that the Project would be required to obtain coverage under the Construction General Permit that would be require the preparation of a SWPPP, and that the implementation of the BMPs identified in the SWPPP would be required with respect to each phase of construction (as required pursuant to WC-HYDRO-12). The Hydrology Report concluded that the Project's impacts related to water quality standards and waste discharge requirements would be less than significant with adherence to the requirements in the Construction General Permit SWPPP. In addition, compliance with the NPDES Municipal Stormwater Permit (also referred to as MS4) would require compliance with the City's Standard Urban Stormwater Mitigation Plan (SUSMP) (as also required pursuant to Mitigation Measures WC-HYDRO-4, WC-HYDRO-5 and WC-HYDRO-13), and the City's Low Impact Development (LID) Ordinance (as required pursuant

to Mitigation Measure WC-HYDRO-1), which requires the preparation of a site-specific SUSMP and the incorporation of SUSMP and LID measures in the site-specific Project plans. The stormwater BMPs that would be required to comply with the SUSMP and the LID Ordinance include elements such as permeable pavement, rainwater harvesting, and sufficient landscape area to promote stormwater infiltration and treatment. The Hydrology Report provided further details on the BMPs required to comply with the SUSMP and LID Standards Manual, as listed below: (Hydrology Report, pp. 8-9, 11-12)

- **Site Design BMPs**: To minimize stormwater pollutants of concern, the Project would minimize pollutants of concern (i.e., sediment, trash, and bacteria, and viruses) through a pretreatment settlement device connected to the one or more rainwater harvesting cisterns to be constructed within each of the new buildings. Building roof runoff, which would comprise the majority of the project runoff, would be collected by roof drains and routed internally through the buildings and plumbed into the cisterns. The cisterns would be constructed as a waterproof part of each building sized to contain the LID volume. Prior to connection to the cisterns, downspout filters would remove any debris that enters the onsite piping system. All other stormwater runoff would be collected by catch basins or trench drains fitted with an insert to collect debris and sediment and routed to the cisterns. To conserve natural areas, the Project includes water quality treatment not currently provided in the existing condition.

  These site treatment BMPs are consistent with and would implement the requirements in Mitigation Measures WC-HYDRO-4, WC-HYDRO-5, and WC-HYDRO-13.

- **Source Control BMPs**: There are no unprotected slopes or unlined channels onsite. The entire area to be developed would be either vegetated or hardscaped. In addition, stenciling would be provided for public storm drains on the Project Site to advise the public on keeping pollutants out of the storm drains.

  These source control BMPs are consistent with and would implement the requirements in Mitigation Measure WC-HYDRO-13.

- **Treatment Control BMPs**: The Project mitigation design shall utilize volumetric or flow based design standards either separately or in combination. Volume-based criteria shall be used in the sizing of the one or more cisterns in each New Building. The LID requirements require the treatment of the peak mitigation flow rate or volume of runoff produced either by a 0.75-inch 24-hour or the 85th percentile rainfall event, whichever is greater. The rainfall intensity of the 85th percentile rainfall is 1.03 inch; therefore, the 85th percentile rainfall event governs. The LID calculation methodology was used to calculate the required treatment volume, which was calculated to be 67,647 cubic feet. In other words, the selected BMPs for the Project Site shall have the capacity to capture and reuse more than the required baseline volume of 67,647 feet. The Hydrology Report states that the total provided treatment volume would be designed to be 67,700 feet.

  These treatment control BMPs are consistent with and would implement the requirements in Mitigation Measures WC-HYDRO-2, WC-HYDRO-4, and WC-HYDRO-13.

More generally, consistent with the WC2035 Plan FEIR, and as stated in the Hydrology Report, the Project would implement Mitigation Measures WC-HYDRO-1 through WC-HYDRO-13 to mitigate impacts related to water quality. (Hydrology Report, pp. 10-12)

For these reasons, with the implementation of Mitigation Measures WC-HYDRO-1 through WC-HYDRO-13, the Project would have a less than significant impact on water quality and this impact was adequately addressed in the WC2035 Plan FEIR, as confirmed in the Hydrology Report.

(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)?

Less Than Significant Impact with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR, the development of individual projects in the WC2035 Plan area would not convert natural lands that provide or substantially contribute to groundwater recharge. It also stated that individual development projects in the WC2035 Plan area were not anticipated to include facilities or mechanisms capable of changing the rate or direction of flow of groundwater. However, due to the high groundwater level within the WC2035 Plan area, construction of implementing projects could require dewatering of subterranean levels. However, short-term construction dewatering would not substantially reduce groundwater levels located within the SFVGB. Therefore, the WC2035 Plan FEIR concluded that impacts to groundwater from implementation of development projects within the WC2035 Plan area would be less than significant. (WC2035 Plan DEIR, p. 4.7-16)

However, to further ensure that individual development projects would not have significant dewatering impacts due to permanent dewatering for buildings, Mitigation Measure WC-HYDRO-2 requires individual projects to be structurally designed when possible to avoid the need for a permanent dewatering system. When a permanent dewatering system is necessary, water should be pumped to a beneficial use on site (landscaping, decorative fountains or lakes, toilet flushing, cooling towers) and/or water should be returned to the groundwater basin by an injection well. (WC2035 Plan FEIR, p. V-17)

This analysis is fully applicable to the Project and Project Site, as confirmed in the Hydrology Report. The Hydrology Report concluded that New Buildings 4, 7, 8 and 9 have exposure to the (historic high) groundwater elevations on the sites for those buildings, which range from 21 to 25 feet below the existing ground surface. The lowest floor elevations of subsurface portions of these four New Buildings (and all of the other New Buildings compared to groundwater elevations are shown in **Table B-17**, *Lowest Floor Elevations and Groundwater Elevations,* below.

TABLE B-17
LOWEST FLOOR ELEVATIONS AND GROUNDWATER ELEVATIONS

New Building	Lowest Floor Elevation (feet above mean sea level)	June 2014 Groundwater Elevation (feet above mean sea level)	Anticipated Dewatering Thickness (feet)
1	847.0	827.0	0
2	839.0	826.6	0
3	838.0	826.6	0

New Building	Lowest Floor Elevation (feet above mean sea level)	June 2014 Groundwater Elevation (feet above mean sea level)	Anticipated Dewatering Thickness (feet)
4	833.3	833.0	0.3
5	843.0	828.7	0
6	840.8	836.0	0
7	820.5	836.0	15.5
8	833.5	836.0	2.5
9	833.5	836.0	2.5

SOURCE: Psomas, 2018.

As noted in Table B-17, the subsurface portions of New Buildings 4, 7, 8, and 9 are anticipated to extend to below the depth to groundwater. Consequently, the excavations would require temporary dewatering during construction to enable construction of the foundations and subsurface levels. Consistent with Mitigation Measure WC-HYDRO-12, for these New Buildings, coverage under the NPDES Construction General Permit would be obtained and its requirement to prepare and implement a SWPPP with BMPs to control runoff and prevent pollution would be satisfied. As noted in the WC2035 Plan FEIR, the volume of dewatering effluent generated during construction would be negligible. (Hydrology Report, p. 13)

With further respect to these four New Buildings, any permanent dewatering required with respect to subterranean basements and/or parking structures would be properly engineered in accordance with applicable regulations to ensure that any effects to groundwater volumes would be less than significant. The preferred option would be to design the applicable New Buildings for buoyant conditions considering hydrostatic pressure to avoid the use of a permanent dewatering system. If permanent dewatering is required, the two options would be storing the dewatering effluent for irrigation or reinjecting the water back into groundwater. (Hydrology Report, p. 13, WC2035 Plan FEIR, p. V-17)

The approach in the Hydrology Report is consistent with Mitigation Measure WC-HYDRO-2. To ensure that an individual development projects would not have a significant dewatering impact due to permanent dewatering for buildings, Mitigation Measure WC-HYDRO-2 requires an individual project to be structurally designed when possible to avoid the need for a permanent dewatering system. The Hydrology Report states that any permanent dewatering required with respect to subterranean basements and/or parking structures would be properly engineered in accordance with applicable regulations to ensure that any effects to groundwater volumes would be less than significant. Consistent with Mitigation Measure WC-HYDRO-2, the preferred option would be to design New Buildings to structurally resist the hydrostatic pressure of groundwater and avoid the use of a permanent dewatering system. If permanent dewatering is required, the two options would be storing the dewatering effluent for onsite beneficial use (landscaping, decorative fountains or lakes, toilet flushing, cooling towers) or reinjecting the water back into groundwater.

As previously discussed, any required dewatering during construction would be temporary and the volume of groundwater removed during construction would not be substantial. If a permanent dewatering system is necessary for a New Building, the water would be pumped to a beneficial use on site and/or returned to the groundwater basin by an injection well, consistent with WC2035-HYDRO-2. (WC2035 Plan FEIR, p. V-17)

(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 offsite?

Less Than Significant Impact with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR, there are no streams or rivers located within the WC2035 Plan area. The Los Angeles River runs directly north of the WC2035 Plan area and, as part of the transportation mitigation identified in the WC2035 Plan implementation, the Variel Bridge would be widened within the Los Angeles River. The WC2035 Plan FEIR determined that, with proper engineering, the proposed widening was not anticipated to modify the Los Angeles River, and the impact would be less than significant. (WC2035 Plan DEIR, p. 4.7-17)

This analysis adequately addressed the Project's impact with respect to alteration of existing drainage patterns with respect to streams and rivers. There are no onsite streams or rivers located within the Project Site, so that project construction would not alter the course of a stream or river.

The WC2035 Plan FEIR also stated that, as a result of construction activities and the modification of existing drainage patterns, the development of individual projects in the WC2035 Plan area could cause increased erosion and siltation. However, it determined that adherence to Project-specific SWPPP requirements and implementation of BMPs designed in accordance with SUSMP and LID requirements would reduce potential construction impacts to a less than significant level. This is consistent with Mitigation Measures WC-HYDRO-1 (which requires compliance with the City's LID Ordinance), WC-HYDRO-4 and WC-HYDRO-13 (which requires compliance with the SUSMP for the Project) and WC-HYDRO-12 (which requires compliance with the Construction General Permit, which in turn requires the preparation of a SWPPP). (WC2035 Plan DEIR, pp. 4.7-15-16)

This analysis adequately addressed the Project's impact on onsite or offsite erosion and siltation as a result of an alteration in drainage patterns on the Project Site. Consistent with Mitigation Measures WC-HYDRO-1, WC-HYDRO-4, WC-HYDRO-12 and WC-HYDRO-13, the Project would adhere to the Project-specific SWPPP prepared and approved for the Project and implement BMPs designed in accordance with the SUSMP prepared and approved for the Project and LID requirements.

The analysis in the WC2035 Plan FEIR is also consistent with the analysis in the Hydrology Report. The existing site drainage sheet flows north at about a 1 percent slope toward catch basins located in the parking lots on the Project Site and Warner Center Lane. Those catch basins are connected to the existing 144-inch x 62-inch reinforced concrete box (RCB) storm drain that enters the Project

Site at the southwest corner and exits the site at the northerly property line. The RCB storm drain discharges into the Los Angeles River Reach 6 through an open channel. With Project implementation, the stormwater flows associated with the Project would continue to drain to the onsite catch basins and Warner Center Lane, which would continue to be connected to the RCB storm drain. It also states, consistent with the WC2035 Plan FEIR, that the Project would comply with the Municipal Stormwater Permit by implementing source and treatment control BMPs pursuant to SUSMP and LID requirements. These erosion control measures would prevent substantial erosion or siltation, both onsite and offsite. Therefore, Hydrology Report confirms that the Project's operational impacts related to onsite or offsite erosion and siltation as a result of an alteration in drainage patterns on the Project Site would be less than significant. (Hydrology Report, pp. 4-5, 10-12)

Accordingly, with implementation of Mitigation Measures WC-HYDRO-1, WC-HYDRO-4, WC-HYDRO-12 and WC-HYDRO-13, the Project would not substantially alter the existing drainage pattern of the Project Site in a manner which would result in substantial erosion or siltation. Therefore, the Project's impacts on surface water quality would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR, as confirmed in the Hydrology Report.

(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?

Less Than Significant Impact with Mitigation Incorporated. As discussed in the preceding Section 4.7(c), the Project would not substantially alter the existing drainage pattern of the Project site or surrounding area, including through the alteration of the course of a stream or river. Therefore, the discussion below relates to whether the Project substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite.

With respect to surface runoff, as discussed in the WC2035 Plan FEIR, the preparation of hydrology and drainage studies would be required for individual development projects within the WC2035 Plan area to determine anticipated flows to existing onsite and offsite storm drain facilities and whether those flows could be accommodated by existing facilities. It also stated that, based on those project-specific studies, appropriate treatments/BMPs (e.g., pipe size, pumping stations, etc.) would be required to address deficiencies and, as such, impacts with respect to surface runoff would be less than significant. The W2035 Plan FEIR also stated that, in order to reduce stormwater runoff entering the storm drainage system, the detention capacity for individual development projects retain a rainfall intensity of 0.5 inches per hour. (WC2035 Plan DEIR, p. 4.7-16)

Consistent with the WC2035 Plan FEIR, the Hydrology Report was prepared, among other reasons, to evaluate and address surface runoff associated with the Project. The Hydrology Report compares existing and proposed peak runoff flows at the property line of the Project Site for 5-, 10-, 25-, 50- and 100-year storm events and concluded that stormwater flows associated with the Project would be reduced by 4 to 9 percent in comparison to existing stormwater flows at the common tributary

point in the RCB storm drain at the north property line. The Project design achieves this by increasing the time of concentration. In other words, rainwater falling on the site will take a longer period of time to flow to the RCB storm drain at the north property line, thus reducing the peak flow at any given time. (Hydrology Report, pp. 4-5)

As discussed in the Hydrology Report, the Project's storm flows would be further reduced through compliance with the City's LID requirements. This includes the installation of catch basins, planter drains, and roof downspouts through the Project Site to collect roof and site runoff, and direct stormwater to the LID system through a series of underground storm drain pipes into cisterns to be constructed within each of the nine buildings. This onsite stormwater conveyance system would serve to prevent onsite flooding and nuisance water buildup on the Project Site by onsite infiltration. With implementation of a stormwater capture and re-use system (i.e., harvesting rainwater and storing in cisterns for later onsite irrigation use), the volume of water leaving the Project Site would be reduced from the existing flows. Note that the reductions achieved with compliance with the LID regulations would be in addition to the previously discussed 4 to 9 percent reductions. (Hydrology Report, pp. 4-5 and 8-9)

The Hydrology Report also states that, consistent with current LID requirements and as a treatment control BMP, the Project's storm flow detention system would be designed to retain and treat an 85^{th} percentile 24-hour rainfall depth of 1.03 inches. Based on this design, the detention system could detain a rainfall intensity of 0.5 inch per hour for up to 2 hours. This satisfies the retention of a rainfall intensity of 0.5 inch per hour recommended in the WC2035 Plan FEIR and would reduce stormwater to a greater extent than contemplated in the WC2035 Plan FEIR. (Hydrology Report, pp. 8-9)

This analysis is consistent with Mitigation Measure WC-HYDRO-13, which states that, in accordance with the SUSMP for the Project, the post-development stormwater runoff discharge rates shall not exceed the estimated predevelopment rate under certain circumstances, and Mitigation Measure WC-HYDRO-1, which requires compliance with the City's LID requirements.

The Hydrology Report concludes that the Project would not incrementally impact the risk of flooding either onsite or offsite during a 50-year storm event, would not substantially increase the amount of surface water in a water body, and would not result in a permanent adverse change to the movement of surface water that would result in an incremental effect on the capacity of the existing storm drain system that serves the Project Site. (Hydrology Report, p. 11)

For these reasons, the Project would not substantially alter the existing drainage pattern of the Project 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 onsite or offsite. Therefore, the Project’s impacts on drainage patterns and the rate or amount of surface runoff would be less than significant.

(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?

Less Than Significant Impact with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR, the preparation of hydrology and drainage studies would be required for individual development projects in the WC2035 Plan area to determine anticipated flows to the existing onsite and offsite storm drain facilities and whether flows from projects within the WC2035 Plan area could be accommodated by existing facilities. Based on those project-specific studies, appropriate treatments and BMPs would be required to address deficiencies and, as such, impacts with respect to surface runoff would be less than significant.

In addition, the WC2035 Plan FEIR stated that individual projects would be required to provide runoff and water quality treatments, including the reduction of stormwater runoff entering the storm drainage system and onsite treatment and infiltration of stormwater. Specifically, consistent with the Urban Design Guidelines in the 2035 Plan and required by the City of Los Angeles LID ordinance, it recommended treating 100 percent of the 85th percentile 24-hour rainfall depth of 1.03 inches of stormwater runoff and providing detention capacity to retain a rainfall intensity of 0.5-inch per hour for up to 2 hours. It identified onsite infiltration as the preferred method of treatment. It concluded that implementation of this Urban Design Guideline and LID requirement would result in less than significant impacts associated with water quality impacts. However, it subsequently stated that increased development, increased density, increased human activity including vehicular activity could result in increased pollutants that could enter surface and groundwater, which could potentially result in a significant impact to water quality. (WC2035 Plan DEIR, p. 4.7-16)

Consistent with the WC2035 Plan FEIR, the Hydrology Report was prepared, among other reasons, to evaluate and address surface runoff associated with the Project. The Hydrology Report compared existing and proposed peak runoff flows at the property line of the Project Site for 5-, 10-, 25-, 50- and 100-year storm events and concluded that stormwater flows associated with the Project would be reduced by 4 to 9 percent in comparison to existing stormwater flows at the common tributary point in the RCB storm drain at the north property line. As previously explained, the project design achieves this by increasing the time of concentration, wherein rainwater falling on the site will take a longer period of time to flow to the RCB storm drain at the north property line, thus reducing the peak flow at any given time. (Hydrology Report, pp. 4-5)

As previously noted, the implementation of LID measures would result in further reductions in post-construction stormwater runoff that are in addition to the previously discussed project design. The Hydrology Report notes that the Project's storm flow volumes would be further reduced through compliance with the City's LID requirements. These requirements would include the installation of catch basins, planter drains, and roof downspouts throughout the Project Site to collect roof and site runoff, and a direct stormwater conveyance system to cisterns to be constructed within each of the nine proposed buildings to prevent onsite flooding and nuisance water buildup on the Project Site. The cisterns would collect the water for later use as onsite irrigation water. Collectively, the cisterns would be able to store 63,436 cubic feet of water. With implementation

of a stormwater capture and reuse system, the volume of stormwater leaving the Project Site would be reduced in comparison to the existing storm flows. (Hydrology Report, pp. 4-5, 8-9)

The Hydrology Report also states that, consistent with current LID requirements and as a treatment control BMP, the Project's storm flow detention system would have the capacity to retain and treat a rainfall of 1.03 inches. This satisfies the retention of a rainfall intensity of 0.5 inch per hour recommended in the WC2035 Plan FEIR and would reduce stormwater to a greater extent than contemplated in the WC2035 Plan FEIR. (Hydrology Report, pp. 8-9)

This analysis is consistent with Mitigation Measure WC-HYDRO-13, which states that, in accordance with the SUSMP for the Project, the post-development stormwater runoff discharge rates shall not exceed the estimated predevelopment rate under certain circumstances, and Mitigation Measure WC-HYDRO-1, which requires compliance with the City's LID requirements. The Hydrology Report concludes that the Project would not incrementally impact the risk of flooding either onsite or offsite during a 50-year storm event, would not substantially increase the amount of surface water in a water body, and would not result in a permanent adverse change to the movement of surface water that would result in an incremental effect on the capacity of the existing storm drain system that serves the Project Site. (Hydrology Report, p. 11)

For these reasons, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, but would instead reduce the existing storm flows and thereby increase the capacity of the existing storm drain system. Therefore, the Project's impact would be less than significant.

With regard to Project's impact with regard to polluted runoff, the Hydrology Report states that, consistent with the WC2035 Plan FEIR and the City's LID requirements, 100 percent of the Project's 85th percentile storm flow would be treated to improve the quality of stormwater flow. It states that the pollutants anticipated to be generated by the Project's uses include sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, bacteria and viruses, oil and grease, and pesticides, and that the pollutant of concern is Coliform Bacteria. (Hydrology Report, pp. 6-9, 11-12)

Pursuant to the site design BMPs identified in the Hydrology Report to comply with the City's LID requirements, the pollutants of concern will be addressed through pre-treatment settlement devices connected to the one or more cisterns that will be installed within each of the new buildings. Runoff from the building roofs, which would be the primary contributor to onsite stormwater, would be collected by roof drains and routed internally through the buildings and plumbed into the cisterns. Prior to connection in the cisterns, downspout filters would remove any debris that entered the onsite piping system. All other stormwater runoff would be collected by catch basins or trench basins fitted with an insert to collect debris and sediment and routed to the cisterns. The runoff within the cisterns would be pumped up for irrigation of the landscape around the Project Site. High flow outlets for the cisterns would continue to be routed to Warner Center Lane and onsite catch basins. (Hydrology Report, p. 7)

The Hydrology Report also recommends as a source control BMPs that stenciling be provided for all onsite storm drains to advise the public on keeping pollutants out of the storm drains, consistent with Mitigation Measure WC-HYDRO-13. (Hydrology Report, p. 8)

The Hydrology Report concludes that the pollutants of concern (i.e., sediments, nutrients, organic compounds, trash and debris, oxygen demanding substances, bacteria and viruses including coliform, oil and grease, pesticides, and metals; [trash and debris would also be removed via previously described physical means]) would be addressed through the recommended stormwater BMPs discussed above and compliance with SUSMP and the City's LID Ordinance, which would require additional BMPs such as permeable pavement, rainwater harvesting to the cisterns, and substantial landscaped areas, all of which would treat pollutants by infiltration through the soil, resulting in construction and operational water quality impacts that would be less than significant. In addition, the SWPPP required for each phase of the Project would implement temporary control measures that include managing potential pollutants, such as construction sanitary waste, such that pollutants would treated and/or properly disposed of. Accordingly, the Hydrology Report determined that the Project's construction and operational impact on water quality would be less than significant. (Hydrology Report, pp. 7-8, 11-12)

This analysis is consistent with Mitigation Measure WC-HYDRO-1, which requires compliance with the City's LID requirements, Mitigation Measures WC-HYDRO-4, WC-HYDRO-5 and WC-HYDRO-13, which require compliance with the SUSMP prepared and approved for the Project, and Mitigation Measure WC-HYDRO-12, which requires compliance with the preparation and approval of a SWPPP for each phase of the Project. In addition, the implementation of Mitigation Measures WC-HYDRO-3, WC-HYDRO-6, WC-HYDRO-7, WC-HYDRO-8, WC-HYDRO-9, WC-HYDRO-10 and WC-HYDRO-11, all of which relate to water quality, would further ensure that the Project's construction and operational impacts on water quality would be minimized.

For these reasons, the Project would not create or contribute runoff water that would provide substantial additional sources of polluted runoff. Therefore, the Project's impact on water quality would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR, as confirmed in the Hydrology Report.

(f) Otherwise substantially degrade water quality?

Less Than Significant Impact with Mitigation Incorporated. As discussed in the preceding Sections 4.7(a), (c), and (e), with the implementation of Mitigation Measures WC-HYDRO-1 and WC-HYDRO-3 through WC-HYDRO 13, adherence to the water quality BMPs identified in the Hydrology Report and compliance with the requirements of the SUSMP and LID ordinance, the Project's construction and operational impacts on water quality would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR, as confirmed in the Hydrology Report.

(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?

No Impact. As discussed in the WC2035 Plan FEIR, the WC2035 Plan area is not located within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other fold hazard delineation map. As such, there would be no impact associated with the placement of housing within a 100-year flood area (WC2035 Plan DEIR, p. 4.7-17). Therefore, because the Project Site is located within the WC2035 Plan area, the Project would have no impact with respect to placing housing in a 100-year flood hazard area, and this environmental topic was adequately addressed in the WC2035 Plan FEIR.

(h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, the WC2035 Plan area is not located within a flood plain, flood hazard zone or regulatory floodway. As such, there would be no impact associated with the placement of structures within a 100-year flood hazard area or the ability of the Project to redirect flood flows. Therefore, because the Project Site is located within the WC2035 Plan area, the Project would have no impact with respect to placing structures within a 100-year flood hazard area, and this environmental topic was adequately addressed in the WC2035 Plan FEIR. (WC2035 Plan DEIR, p. 4.7-17)

(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?

No Impact. As discussed in the WC2035 Plan FEIR, the WC2035 Plan area is not located within an area subject to levee or dam failure (WC2035 Plan DEIR, p. 4.7-17). Therefore, because the Project Site is located within the WC2035 Plan area, the Project would have no impact with respect to exposing 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 this environmental topic was adequately addressed in the WC2035 Plan FEIR.

(j) Inundation by seiche, tsunami, or mudflow?

No Impact. As discussed in the WC2035 Plan FEIR, the WC2035 Plan area is not located within an area subject to inundation by seiche, tsunami or mudflow (WC2035 Plan DEIR, p. 4.7-17). Therefore, because the Project Site is located within the WC2035 Plan area, the Project would have no impact with respect to inundation by seiche, tsunami or mudflow, and this environmental topic was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following mitigation measures from the WC2035 Plan FEIR are recommended for the Project to further reduce the less than significant impacts related to

hydrology and water quality (these mitigation measures have been non-substantively modified to apply specifically to the Project):

HYDRO-1: The Applicant shall comply with the Low Impact Development (LID) Ordinance. Construction contractors for the Project shall be required to control erosion and runoff as necessary through the use of site appropriate grading practices. Specifically, the construction contractor shall plan for and implement Best Management Practice (BMP) during each phase of construction to the satisfaction of the Department of Public Works, Bureau of Engineering, Stormwater Management Division City of Los Angeles, and/or other designated responsible agencies/departments. (LID measures also require review and approval of the Watermaster.)

HYDRO-2: The Applicant shall ensure that structural design of the Project will be modified when possible to avoid the need for a permanent dewatering system. When a permanent dewatering system is necessary, one or more of the following measures as per the Department of Building and Safety shall be followed:

- Pumping water to a beneficial use on site (landscaping, decorative fountains or lakes, toilet flushing, cooling towers); or
- Returning water to the groundwater basin by an injection well.

HYDRO-3: The Applicant shall provide sufficient available area so that runoff can be collected in roadside vegetated swales, as appropriate and feasible, and directed to existing curb and gutter or storm drains. In other areas, runoff shall be collected in gutters and directed to the storm drain systems. Swale design shall be coordinated with on-site hazardous materials issues as necessary.

HYDRO-4: The Applicant shall comply with applicable NPDES permit requirements, including preparation and implementation of a Standard Urban Stormwater Mitigation Plan (SUSMP) for each phase of the Project in accordance with the Los Angeles Municipal Storm Water permit. The SUSMP shall identify post development peak runoff, conserve natural areas, minimize stormwater pollutants, protect slopes and channels, and post construction Best Management Practices (BMP) and other items as required by the permit. (SUSMP measures require review and approval of the Watermaster.)

HYDRO-5: The Applicant shall ensure that runoff from parking lots to be treated, as required by SUSMP regulations, prior to discharging into existing storm drain systems.

HYDRO-6: The Applicant shall ensure that all wastes from construction on the Project Site shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non-recyclable materials/wastes shall be taken to an

appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.

HYDRO-7: The Applicant shall ensure leaks, drips, and spills be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

HYDRO-8: The Applicant shall prevent material spills from being hosed down at the pavement. Dry cleanup methods shall be required wherever possible.

HYDRO-9: The Applicant shall ensure that dumpsters be covered and maintained. Uncovered dumpsters shall be required to be placed under a roof or covered with tarps or plastic sheeting.

HYDRO-10: The Applicant shall ensure that where truck traffic is frequent, gravel approaches and dirt tracking devices shall be used to reduce soil compaction and limit the tracking of sediment into streets.

HYDRO-11: The Applicant shall ensure that all vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be required to be conducted at an appropriate location. Drip pans or drop cloths shall be required to catch drips and spills.

HYDRO-12: Short-term water quality impacts may result from the construction of the proposed Project. Each phase of project construction shall comply with the Construction General Activity Stormwater Permit (General Permit) and the City's Development Construction Program pursuant to the NPDES Permit (Permit No. CA00401). Implementation of the General Permit and NPDES Permit programs will mitigate potential impacts to a level of insignificance.

HYDRO-13: Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control, which requires the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. The Applicant must meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board for each phase of the Project, including the following (a copy of the SUSMP can be downloaded at: (http://www.swrcb.ca.gov/rwqcb4/).

- The Applicant shall implement stormwater BMPs to treat and, as appropriate and feasible, infiltrate the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

- Post development peak stormwater runoff discharge rates shall not exceed the estimated predevelopment rate for developments where the increase peak stormwater discharge rate will result in increased potential for downstream erosion.
- Clearing and grading of native vegetation at the project site shall be limited to the minimum needed to build lots, allow access, and provide fire protection.
- Trees and other vegetation at each site shall be maximized by planning additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.
- Natural vegetation shall be promoted by using parking lot islands and other landscaped areas.
- Any identified riparian areas shall be preserved.
- Appropriate erosion control and drainage devices, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code will be incorporated.
- Outlets of culverts, conduits or channels from erosion by discharge velocities shall be protected by installing a rock outlet protection. Rock outlet protection is physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe. Sediment traps shall be installed below the pipe-outlet. Inspect, repair, and maintain the outlet protection after each significant rain.
- Any connection to the sanitary sewer will have authorization from the Bureau of Sanitation.
- Impervious surface area will be reduced by using permeable pavement materials where appropriate. These include pervious concrete/asphalt; unit pavers, i.e. turf block; and granular materials, i.e. crushed aggregates, cobbles.
- Roof runoff systems will be installed where site is suitable for installation.
- Messages that prohibit the dumping of improper materials into the storm drain system adjacent to storm drain inlets shall be painted.
- All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING - DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.
- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks within the project area.
- Legibility of stencils and signs must be maintained.

- Materials with the potential to contaminate stormwater must be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
- The storage area will be paved and sufficiently impervious to contain leaks and spills.
- The storage area shall have a roof or awning to minimize collection of stormwater within the secondary containment area.
- An efficient irrigation system shall be designed to minimize runoff including: drip irrigation for shrubs to limit excessive spray; shutoff devices to prevent irrigation after significant precipitation; and flow reducers.
- Cleaning of oily vents and equipment will be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.
- Trash dumpsters will be stored both under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids. Containers will be washed in an area with properly connected sanitary sewer.
- Wastes, including paper, glass, aluminum, oil and grease will be reduced and recycled.
- Liquid storage tanks (drums and dumpsters) will be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. A secondary containment system such as berms, curbs, or dikes shall be installed. Drip pans or absorbent materials whenever grease containers are emptied will be used.
- The owner(s) of the property will prepare and execute a covenant and agreement satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer's instructions.

10. Land Use and Land Use Planning

Analysis in WC2035 Plan FEIR

The WC2035 Plan area is located within the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan (Community Plan) area. The WC2035 Plan was prepared to address increasing residential development beyond that anticipated in the 1993 Warner Center Specific Plan, and address new planning and regulatory requirements associated with sustainability and reducing

regional greenhouse gas emissions. The entire WC2035 Plan area, including the Project Site, is designated Regional Center Commercial in the Community Plan and zoned Warner Center (WC).

The WC2035 Plan divides the WC2035 Plan area into eight districts, each with its own distinctive character and corresponding development standards. The districts include the following: (1) Downtown; (2) Commerce; (3) Uptown; (4) College; (5) North Village; (6) River; (7) Topanga; and (8) Park (the WC2035 Plan FEIR has different names for some of these districts because they were revised following the completion of the WC2035 Plan DEIR). The permitted land uses and development standards, such as maximum FAR, building height, setbacks, and open space requirements, are different for each district.

The Project Site is located in the central and eastern portion of the Commerce District, which is intended to be the most "jobs-rich" district, providing flexible-employment uses such as hybrid industrial, hospital, creative and cognitive production and research and development uses with some associated retail. A range of land uses is therefore permitted in the Commerce District, including hybrid industrial uses, residential uses ranging from Work-Live Units to multiple residential dwelling units, restaurants, retail stores and service industry and office uses. The WC2035 Plan establishes a base maximum FAR of 4.5:1 for the Commerce District, together with a graduated FAR requirement that sets forth the minimum allowable non-residential floor area and the maximum allowable residential floor area any given overall FAR for the Project, in order to maintain an appropriate balance between commercial and residential development. Within the Commerce District, the residential floor area cannot exceed 50 percent of the overall floor area.

Physically Divide an Established Community

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) stated that the WC2035 Plan would enable and encourage transit-oriented development and support a sustainable regional center. By permitting increased residential development (compared to the 1993 Warner Center Specific Plan), the WC2035 Plan would concentrate a mix of uses within walking distance of transit, as well as within walking distance of one another so people could easily walk rather than drive, thus connecting the area with surrounding uses and reducing vehicle miles traveled.

Existing uses within the WC2035 Plan area would not be significantly impacted by the increased density. Rather, the proposed uses and densities would complement and increase the energy efficiency of existing uses within the WC2035 Plan area. It also concluded that the residential neighborhoods within Warner Center (generally the multi-family area south and east of Warner Center Park) were anticipated to remain substantially untouched by the implementation of the WC2035 Plan. Therefore, it determined that the build out of the WC2035 Plan would not divide, disrupt, or isolate an existing community or neighborhood within the WC2035 Plan area. Rather, it would densify and enhance (by activating streets and increasing the nighttime population of the area) an existing center and promote walkability, the use of transit and would provide amenities to nearby residential communities. These characteristics would serve to connect the proposed uses with surrounding uses. The increased density anticipated would promote characteristics desirable in a center (activity areas appealing to both daytime workers and the residential population), creating a more-vibrant city environment. Therefore, no significant land use impact was anticipated

to occur within the WC2035 Plan area with respect to the division, disruption of isolation of an existing community or neighborhood. (WC2035 Plan DEIR, pp. 4.8-22-23)

Consistency with Surrounding Land Uses

With regard to the WC2035 Plan's consistency with surrounding land uses, the WC2035 Plan FEIR stated that the increased density permitted under the WC2035 Plan would be perceived from outside of the WC2035 Plan area, primarily through the increase in the number and height of buildings visible from surrounding streets and from some buildings. In addition, all areas within WC2035 Plan area were anticipated to experience an increase in traffic. However, only one intersection (Variel Avenue and Victory Boulevard) and one arterial street segment (Canoga between Ventura Boulevard and Oxnard Street) would be significantly impacted following traffic mitigation. The WC2035 Plan FEIR concluded that the perceived changes in density and traffic from outside of the WC2035 Plan area would result in a significant land use impact on areas surrounding the WC2035 Plan area. (WC2035 Plan DEIR, pp. 4.8-23-24)

Consistency with Applicable Land Use Plans

The WC2035 Plan FEIR concluded that the WC2035 Plan would be consistent with regional plans – including the Southern California Association of Governments (SCAG) Regional Transportation Plan and Regional Comprehensive Plan, SCAQMD's AQMP, Metro's Congestion Management Plan – because it would balance and concentrate growth around transit. It stated that such transit-oriented development would reduce regional vehicle trips and vehicle miles travelled, and therefore also reduce greenhouse gas emissions. (WC2035 Plan DEIR, p. 4.8-24)

The WC2035 Plan FEIR concluded that the WC2035 Plan would be consistent with the objectives and goals of the Community Plan (and therefore the General Plan Framework Element), including those that strive to achieve a balanced and diverse housing supply (Objectives 1-1 and 1-4), reduce automobile trips (Objectives 1-2, 2-3, 10-1, 11-1, 12-1, and 13-1); preserve, enhance, and reinforce the identity of land uses within and surrounding the WC2035 Plan area (Objectives 1-3, 2-4, 3-1); provide adequate public services (Objectives 4-1, 5-1, 8-1, and 9-1), and ensure adequate parking (Objective 15-1). The WC2035 Plan FEIR did not identify any objectives with which the WC2035 Plan would be inconsistent. In addition, the WC2035 Plan FEIR concluded that the General Plan Amendment required in connection with the WC2035 Plan would be consistent with the function of the Warner Center designation as a Regional Center. (WC2035 Plan DEIR, pp. 4.8-25-28, Table 4.8-2)

The WC2035 Plan FEIR further concluded that implementation of the WC2035 Plan would also be consistent with the goals and objectives of the General Plan Housing Element, including the following: the production and preservation of an adequate supply of housing and rental opportunities (Objective 1.1); promoting housing strategies which support infrastructure and service capacities (Objective 2.1); locating jobs, housing, and services in mutual proximity (Objective 2.3); and those that preserve and enhance the quality of scale and character of development (Objectives 2.4 and 2.8). The WC2035 Plan FEIR did not identify any objectives of the Housing Element with which the WC2035 Plan would be inconsistent. It also noted that implementation of the Urban Design Guidelines would help ensure that new development within

the WC2035 Plan area would maintain the scale and character of nearby residential neighborhoods. (WC2035 Plan DEIR, p. 4.8-29, Table 4.8-3)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR concluded that implementation of the WC2035 Plan would result in less than significant impacts relating to land use, and no mitigation measures were required (WC2035 Plan DEIR, p. 4.8-30).

Project Impacts

Against the background described above, the Project's tiered impacts on land use are discussed below.

Would the project:

(a) Physically divide an established community?

Less Than Significant Impact. The WC2035 Plan FEIR determined that the implementation of the WC2035 Plan (which includes the Project Site would not divide, disrupt or isolate an existing community or neighborhood. Implementation of the WC2035 Plan would enable and encourage transit-oriented development and support a sustainable regional center. The increase in residential development and density under the WC2035 Plan would locate residential uses within walking distance of transit as well as within walking distance of other goods and services, thus connecting the area with surrounding uses and reducing vehicle miles traveled. Existing uses within the WC2035 Plan area would not be significantly impacted by the increased density. Rather, the proposed uses and densities would complement and increase the energy efficiency of existing uses within the WC2035 Plan area. It also concluded that the residential neighborhoods within Warner Center (generally the multi-family area south and east of Warner Center Park) were anticipated to remain substantially untouched by the implementation of the WC2035 Plan. The increase in density within the WC2035 Plan would be perceived from outside of the area primarily by the increase in the number and height of buildings visible from surrounding streets and from some buildings. The WC2035 Plan FEIR did not find that such perceived changes in density would physically divide an existing community. While all areas within WC2035 Plan area were anticipated to experience an increase in traffic, that increase in traffic was not found to be substantial enough to physically divide a community. Therefore, the WC2035 Plan FEIR concluded that the implementation of the WC2035 Plan would not result in a significant land use impact within or surrounding the WC2035 Plan area. (WC2035 Plan DEIR, pp. 4.8-22-24)

This analysis fully applies to the Project. There is no existing residential use on the Project Site that would be physically divided or otherwise disrupted by the development of the Project. Given that the Existing Buildings on the Project Site are limited to commercial uses, the development of the Project would not physically divide an established community. The Project's New Buildings vary in height from approximately 35 feet (two levels) to 350 feet (24 levels) and would be visible from surrounding streets and other buildings. However, consistent with the analysis in the WC2035 Plan FEIR, such perceived density would not physically divide a community. Furthermore,

notwithstanding any increase in traffic due to the implementation of the Project, as discussed in Section 16 of this Tiered IS, Transportation and Circulation, such increase would not physically divide a community.

For these reasons, the Project's impact would be less than significant, and this environmental topic was adequately addressed in the WC2035 Plan FEIR.

(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?

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, buildout under the WC2035 Plan would be consistent with the City's land use plans, including the General Plan Framework, the General Plan Housing Element, the General Plan Mobility Element, and the Community Plan (WC2035 Plan DEIR, pp. 4.8-24-25, 28-30, Tables 4.8-2 and 4.8-3).

This analysis fully applies to the Project. The WC2035 Plan FEIR determined that the WC2035 Plan was consistent with the applicable portions of the City's land use plans and policies. As discussed below, the Project in turn is consistent with all applicable development standards and other applicable requirements in the WC2035 Plan. Therefore, the Project is consistent with the applicable portions of the City's land use plans and policies.

The Project's general consistency with those land use plans, policies and plans is further demonstrated as follows:

General Plan Framework Element: The land use designation for the Project Site is Regional Center Commercial, and Regional Centers are intended to serve as the focal points of regional commerce, identity and activity. Regional centers should contain a diversity of uses and are encouraged to integrate housing with commercial uses that are designed to improve pedestrian activity. (General Plan Framework Element, Chapter 3) Consistent with the definition and desired physical development for regional centers, the Project is a mixed-use development that will, as discussed below, comply with the applicable development in the WC2035 Plan, including the development standards for the Commerce District, and provide pedestrian adapted pathways throughout the Project Site to maintain pedestrian connectivity between the New Buildings and adjacent street frontages. In conformance with the goals of the General Plan Framework Element, the Project will help establish Warner Center as a regional center providing work, live and play opportunities. Furthermore, the Project contains a diverse range of housing opportunities within proximity to a variety of public transit options, both existing and proposed.

General Plan Housing Element: In accordance with the objectives and goals of producing an adequate supply of rental and ownership housing in the City, the Project is a mixed-use development that would include a substantial number and variety of housing units in proximity to several transit options, including the Metro Orange Canoga Line Station. The Project includes a

total of 1,009 residential units, with a mix of studio, one-, two-, and three-bedroom units and work-live units. The Project would not displace any current residents or remove any existing housing stock, since it would be developed on land currently improved solely with commercial uses.

General Plan Mobility Element: The Mobility Element encourages development, which promotes concentrations of housing, jobs, and local services within close proximity of one another. Policy 3.3 for Land Use Access and Mix is to "[p]romote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services", and Policy 3.4 for Transit Services is to "[p]rovide all residents, workers, and visitors with affordable, efficient, convenient, and attractive transit services." The Project satisfies these policies because it is a mixed-use development with residential and commercial buildings located in close proximity to a variety of existing public transit lines and planned lines. The mix of residential, office, restaurant and retail uses reduces vehicle trips by situating residential and non-residential uses in close proximity to one another, often in the same New Buildings, thereby promoting a work/live/play orientation.

Community Plan: The Community Plan is part of the Land Use Element of the General Plan. The Project is generally consistent with the following relevant residential and commercial land use Goals, Objectives and Policies identified in the Community Plan:

Goal 1: A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the Community Plan Area.

Objective 1-1: Achieve and maintain a housing supply sufficient to meet the diverse economic needs and current and projects population to the year 2010.

Policy 1-1.1: Maintain an adequate supply and distribution of multi-family housing opportunities in the Community Plan Area.

Objective 1-2: Reduce automobile trips in residential areas by locating new housing in areas offering proximity to goods, services, and facilities.

Policy 1-2.1: Locate higher residential densities near commercial centers and major bus routes where public service facilities, utilities and topography will accommodate development.

Policy 1-2.2: Encourage multiple family residential development in commercial zones.

The Project is generally consistent with these goals, objectives, and policies by providing quality, well-designed multi-family units with a range of unit types from studio to three-bedroom floor plans and includes apartment, condominium and Work-Live Units as part of the multi-phase, mixed-use development. This variety of housing types would ensure that the housing is accessible to a wider segment of the community. The Project's proximity to numerous public transportation options would further ensure that the proposed housing is accessible to a broad segment of the population. In addition, the location of housing within a mixed-use development would reduce the need for vehicle trips because services and amenities would be located adjacent to and within walking distance of the Project's non-residential uses.

Goal 2: An economically vital commercial sector offering a diversity of goods and services to meet the needs of the community plan area. This means that commercial land use policies must support maximum efficiency and accessibility of commercial development while preserving the historic commercial and cultural character of the district.

Objective 2-1- Conserve and strengthen viable commercial development and encourage recycling of obsolete commercial development.

The Project would redevelop the current and somewhat obsolete commercial uses with a vibrant mix of residential, commercial, restaurant, retail and hotel uses. The Commerce District established in the WC2035 Plan, where the Project Site is located, is meant to be a center of commercial density for the newly envisioned community. The existing low-density commercial uses limit the Project Site's efficiency and do not provide a diversity of goods and services to the meet the needs of the community. The mixed-use Project would better meet the needs of the Warner Center community and strengthen the economic viability of the commercial sector.

Goal 5: A community with sufficient open space in balance with new development to serve the recreational environment and health needs of the community.

The Project incorporates a significant amount of publicly accessible open space (PAOS), as required by the WC2035 Plan, as well as common area open space for the exclusive use of project residents. Pedestrian-adapted pathways (PAP) are incorporated into the PAOS to provide access to all of the New Buildings and connectivity between De Soto Avenue and Burbank Boulevard. The inclusion of focal points throughout the Project would provide additional open space in the form of shaded seating areas for employees, residents and visitors.

For these additional reasons, the Project would not conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. As such, the impact would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

The Project also complies with all of the development standards in the WC2035 Plan established for the Commerce District, as follows:

Section 6.1.2.2.1 (Uses): A variety of land uses are permitted in the Commerce District, including work-live units, multiple residential dwelling units, offices, hotels, restaurants and retail uses, all of which are proposed as part of the Project.

Section 6.1.2.2.2 (Intensity): A base maximum Floor Area Ratio (FAR) of 4.5:1 is permitted in the Commerce District. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. The Project consists of approximately 2,634,268 square feet of floor area on the 1,042,301-square-foot Project Site (net of anticipated dedications), which results in an overall FAR of 2.52:1, significantly lower than what is allowed in the Commerce District.

Section 6.1.2.2.3 (Permitted Development by Floor Area): The minimum non-residential floor area required for a project with an FAR between 2.5:1 and 2.75:1 is 65 percent, and the maximum

residential floor area allowed is 35 percent. However, since the Project includes two incentivized uses in accordance with Section 6.2.1 (Incentivized Uses and Bonuses), the Project may ascend the Graduated FAR Table from the ">2.5 Up To 2.75" FAR level to the ">3.0" FAR level, which requires 50 percent minimum non-residential floor area and allows 50 percent maximum residential floor area, in accordance with WC2035 Plan Section 6.2.1.2.3. In compliance with Section 6.1.2.2.3, the Project includes a total of 2,634,268 square feet of floor area, including 1,458,755 square feet (55 percent) of non-residential floor area and 1,175,513 square feet (45 percent) of residential floor area.

Section 6.1.2.2.4 (Ground Floor Limitations): No ground-floor residential uses are permitted in the Commerce District. As such, the Project only includes non-residential uses on the ground floor of all New Buildings, including the non-residential portions of the work-live units, office, restaurant and/or retail uses, and non-habitable residential uses that are permitted, including lobby areas and other residential amenities. In compliance with Sections 6.1.2.2.4 (a) through (d), each of the New Buildings would contain non-residential ground-floor uses with a minimum depth of 25 feet from the front building façade and a minimum of floor-to-floor height of 15 feet and would include transparent windows and/or doors along a minimum of 75 percent of the building façade located between 30 and 84 inches from the ground floor. Where parking structures are located on the ground floor and adjacent to a public street or PAOS area, a minimum of 80 percent of the side of the above-grade parking structure would be wrapped with non-residential development.

Section 6.1.2.2.5 (Building Height): Projects within the Commerce District are permitted an unlimited building or structure height, and the maximum building height of any of the New Buildings is approximately 350 feet (24 stories), upon completion of all phases. Each New Building will meet the minimum 35-foot street wall provision as required along De Soto Avenue and Burbank Boulevard. For buildings over 75 feet in height further site-specific analysis is required to minimize shade/shadow impacts to sensitive uses to the extent reasonable and feasible. As previously discussed in Section 1(c) of this Tiered IS, a site-specific shade/shadow study was conducted and the Project would have no significant impact with respect to shadows cast from the Project onto surrounding sensitive uses.

Section 6.1.2.2.6 (Street Standards): The Project complies with the required street standards for the Commerce District and would include improvements/dedications in satisfaction of these requirements, in accordance with the construction phasing plan presented in Figures A-31 through A-39 of this Tiered IS.

Section 6.1.2.2.7 (Activity Nodes): The Project includes an activity node, with a concentration of pedestrian-serving restaurant/retail uses, at the intersection of Burbank Boulevard and Warner Center Lane. This location meets the activity node requirements set forth in Section 6.2.4.2.1 and is proximate to the broadly scoped location of the activity node shown on Map 10 in the WC2035 Plan.

Section 6.1.2.2.8 (Active Street Frontages): The Project does not involve a public street with an active street frontage; however, the Project's frontage on Burbank Boulevard, from the western property line of the Project Site to the east end of the activity node proposed at the intersection of

Burbank Boulevard and Warner Center Lane, would be treated as an active street frontage and meets the requirements for projects along active street frontages set forth in Section 6.2.4.

Section 6.1.2.2.9 (Setbacks): In the Commerce District, projects are required to observe a front setback area of not less than 12 feet and not more than 15 feet. Projects not located on an active street frontage, however, are permitted a front setback area of up to 20 feet. A minimum of 30 percent of the required setback area shall be landscaped. The Project includes front setback areas in compliance with these standards or, where applicable and feasible, with the standards set forth the Urban Design Guidelines. In addition, the Project meets and exceeds the minimum 30 percent landscaped front setback requirement, with approximately 33,947 square feet (or 37 percent) of proposed combined landscaping in the front setback areas (at Project completion).

Section 6.1.2.2.10 (New Street Extension of Variel Avenue (from Califa Street to the North to Burbank Boulevard to the South): According to Section 6.1.2.2.10 of the WC2035 Plan, "it is anticipated that Variel Avenue will be extended from Califa Street to the north to Burbank Boulevard to the south." It is noted that neither Section 6.1.2.2.10 nor any other provision of the WC 2035 Plan or the City's General Plan requires the extension of Variel Avenue. Nonetheless, the Project has been designed to allow for a future connection to the southern terminus of Variel Avenue to the north in the future with the redevelopment of the site to the north. Specifically, the Project includes a north/south drive, designated as Adler Drive, which connects Burbank Boulevard to the northern property line. Adler Drive is aligned with existing Variel Avenue to the north. At such time as the existing buildings and related improvements located on the parcels to the north of the Project Site are removed and those parcels are redeveloped, it would then be possible to connect the northern terminus of Adler Drive to the southern terminus of the Variel Avenue (north of Califa Street) and effectively allow the extension of Variel Avenue through the Project Site.

In addition, the Project is consistent with applicable WC2035 Plan standards that apply to the entire WC2035 Plan area, as follows:

Section 6.2.1 (Incentivized Uses and Bonuses: As previously discussed, the Project is designed to include two incentivized uses in accordance with Section 6.2.1.1, including: (1) five local-serving retail businesses, each with a maximum of 5,000 square feet in floor area, located on ground floors and in compliance with all of the applicable regulations set forth in the WC2035 Plan; and (2) PAOS provided at a minimum of 50 percent more than the size that is required by Section 6.2.2.2. The five proposed local-serving retail businesses will each contain a maximum floor area of 5,000 square feet, and will be located in Buildings 1, 2, 3 and 5. The Project includes a total of approximately 121,683 square feet (2.79 acres) of PAOS, which is approximately 11.66 percent of the net lot area, which is greater than the minimum PAOS required pursuant to Section 6.2.2 of the WC2035 Plan. Furthermore, the Project includes the reconfiguration of Warner Center Lane, a private street that qualifies as a New Street under the WC2035 Plan. Pursuant to Section 6.2.2.3.2 of the WC2035 Plan, the inclusion of this New Street reduces the Project's PAOS requirement by 50 percent, from 15 percent to 7.5 percent of the net lot area. This translates to a reduction in the minimum PAOS required from 156,345 square feet, or 3.59 acres, to approximately 78,172.6 square feet, or 1.80 acres. However, as previously discussed, the Project requires two Incentivized

Uses in order to ascend the Graduated FAR Table use mix for the Commerce District. One of the Incentivized Uses provided is a minimum of 50 percent more PAOS than is required by Section 6.2.2 of the WC2035 Plan. As a result, the PAOS required for the proposed Project increases by 50 percent, from 1.8 acres to approximately 2.69 acres. Therefore, the 2.79 acres of PAOS included in the Project exceeds the required PAOS of 2.69 acres. The proposed incentivized uses would meet the requirements established in WC2035 Plan Section 6.2.1.3 and would be accessible to the general public during regular business hours.

Section 6.2.2 (Publicly Accessible Open Space (PAOS)): The Project's PAOS complies with the standards in Section 6.2.2.2. The PAOS is contiguous and internally integrated into the overall design of the Project. It would be accessible to the public from 6:00 am to 10:00 pm. A minimum of 90 percent of the PAOS is open to the sky and at least 51 percent (116,730 square feet) of the PAOS is comprised of landscaping (50 percent required), Finally, the PAOS includes more seating than required, with 256 seats provided while only 243 seats are required (based on a required rate of 1 seat per 500 square feet).

Section 6.2.3 (Parking): The Project has been designed to be in full compliance with any applicable parking provisions set forth in Section 6.2.3 and any applicable LAMC provisions.

Section 6.2.3.2.1 (Residential Parking Requirements (including Work-Live Units)): Residential uses, including work-live units, require a minimum of 1 parking space per unit and may provide a maximum of 2 parking spaces per unit. Guest parking is optional for projects with more than 100 units. The Project includes a total of 1,009 residential units (including 841 apartment units, 53 of which will be Work-Live Units, and 168 condominium units, 15 of which will be Work-Live Units), resulting in a minimum requirement of 1,009 parking spaces and a maximum limit of 2,018 parking spaces. The Project includes a total of 1,627 residential parking spaces (excluding guest parking spaces), which exceeds the minimum requirement by 618 parking spaces and is well under the maximum limit. The Project also includes 186 non-required parking spaces for residential guests. Pursuant to LAMC Section 12.21.A.16(a), the Project will include 870 long-term bicycle parking spaces and 264 short-term bicycle parking spaces, for a total of 1,124 bicycle spaces for the proposed residential uses. The Project complies with those requirements.

Section 6.2.3.2.2 (Non-Residential Parking Requirements): For office uses, the WC2035 Plan requires a minimum of 1 automobile parking space per 1,000 square feet, and allows a maximum of 4 parking spaces per 1,000 square feet. The Project consists of approximately 1,140,746 square feet of office floor area and will provide parking in compliance with the minimum and maximum requirements. For restaurant and retail (commercial) uses, the WC2035 Plan requires a minimum of 2 parking spaces per 1,000 square feet, and allows no more than four parking spaces per 1,000 square feet. The Project includes approximately 85,545 square feet of restaurant, retail, and floor space which may include retail and/or office floor area. Parking will be provided for the restaurant/retail uses in compliance with the minimum and maximum requirements. For hotel uses, and in accordance with Section 6.2.3.2.2(h), LAMC Section 12.21.A.4(b) would apply, which requires parking as follows: 1 parking space for each individual guest room or suite of rooms for the first 30; 1 additional parking space for each 2 guest rooms or suites of rooms in excess of 30

but not exceeding 60; and 1 additional parking space for each 3 guest rooms or suites of rooms in excess of 60. Based on the proposal for 228 hotel guest rooms in Building 6, a minimum of 111 parking spaces are required. A total 209 parking spaces would be provided, which exceeds the minimum requirement. Community spaces require 1 parking space per 50 square feet, thus resulting in a need for 82 stalls for the community space in Building 4a.

Section 6.2.4 (Activity Nodes and Active Street Frontages): Where uses would front on the activity node proposed at the intersection of Burbank Boulevard and Warner Center Lane and on the active street frontage located on Burbank Boulevard (from the western boundary of the Project Site to the eastern boundary of the activity node), the Project would comply with the non-residential ground floor regulations established in Section 6.2.4.2. No residential uses are proposed on the ground floors at these locations.

Section 6.2.5 (New Streets and Pedestrian Adapted Pathways (PAP)): As a master planned project with two public street frontages that are perpendicular, a "New Street" or PAP must be incorporated into the Project and must connect with each public street at a minimum of one discrete point, as required by Section 6.2.5.3.1(b). The Project includes both a New Street and a PAP.

The Project is also generally consistent with the Urban Design Guidelines and Supplemental Sign District Guidelines in the WC2035 Plan, as follows:

Section 6.2.6.2.1 (Parking in Required Setbacks): The Project does not include surface parking within the front setback area.

Section 6.2.6.2.2 (Architecture): While each New Building is differentiated from one another in terms of design and orientation, their architectural features are reflective of and complementary. The Project design incorporates several different materials to help differentiate the ground floor from the upper floors in all of the New Buildings.

Section 6.2.6.2.3 (Lighting and Security): Lighting for all phases of the Project will be integrated into the building designs and designed to ensure that a safe and secure environment is provided for all users of the Project. Exterior lighting would be appropriately shielded to reduce glare, and would be contained within the Project Site. Lighting for PAOS areas would similarly be focused downward or inward, as appropriate, and shielded to reduce glare and prevent light spillover on adjacent properties.

Section 6.2.6.2.4 (Utilities): Consistent with the requirement for master planned projects, the Project would underground utility lines within the public rights-of-way, subject to the standards of the Bureau of Street Services.

Section 6.2.6.2.5 (Articulation of Building Facades): The New Building facades have been designed to meet the requirements listed in Section 6.2.6.2.5 and include a differentiation between ground-floor (first 35 feet of height) and upper-floor treatments and to distinguish the buildings' appearances from the surrounding street and neighboring buildings. This includes the application of a variety of building materials and ornamentation, and variations in depth, at appropriate

intervals, on all sides of the buildings for at least 15 percent of the length of each entire building façade. In addition, as required, the building façades of above-grade parking structures are designed to be compatible in color, material, and architectural detail with the buildings they serve in order to ensure the parking structure is well-integrated and does not detract from the aesthetics of the building.

Section 6.2.6.2.6 (General Landscape Requirements for All Projects - Landscape and Irrigation Plans): All planted areas within the Project Site would be serviced by an automatic irrigation system and conform to the City's water conservation requirements. Final landscape and irrigation plans for each New Building prepared by a licensed landscape architect would be submitted to the Director of Planning for review and approval prior to the issuance of any building permit for the applicable New Building. The Project has been designed for general consistency with the WC2035 Plan's Urban Design Guidelines, as well as compliance with PAOS requirements (where applicable) The Project would be landscaped to create attractive public and private settings for residents, employees and visitors to enjoy, while enhancing the Project Site's relationship to surrounding properties. As required under the WC2035 Plan's PAOS requirements, a minimum of 50 percent of the PAOS will be landscaped.

Section 6.2.6.2.7 (Landscaping Requirements for Parking Facilities): Only one surface parking lot is proposed, as part of Building 1. This surface lot would be landscaped to satisfy Section 6.2.6.2.7(1). Any and all above-grade parking structures or portions of buildings used for parking located within the interior of the Project Site would include a minimum landscaped setback of 5 feet around the parking perimeter, or as otherwise required by the WC2035 Plan standards. Trees would be planted in setback area around parking structures, at a minimum of 1 tree for every 30 linear feet of length of the parking structure, to screen and break up the appearance of the parking façade, and the parking facades have been designed to minimize headlight and noise impacts on adjacent properties. No new temporary surface parking areas are proposed as part of the Project.

Section 6.2.6.2.8 (Street Trees): The existing street trees located on De Soto Avenue would be removed to accommodate the street widening. As shown on the landscape plans, the Project includes the planting of new Ginkgo Biloba street trees along De Soto Avenue, per the species requirement for street trees in the WC2035 Plan. There are 26 existing street trees located along Burbank Boulevard, 13 of which would be retained and 13 of which would be removed.

WC2035 Plan 6.2.10: Sustainability: The Project is designed to meet the equivalent green standards for Leadership in Energy and Environmental Design (LEED™) at the Silver Level, and would comply with the City's Green Building Ordinance. In addition, the roofs of the New Buildings would comply with Option 1 of the Solar Reflectance Index Requirement set forth in Appendix G to the WC2035 Plan (built-up roofing with an SRI equal to or greater than 78).

Section 7 (Mobility): The Applicant has filed an application with the Department of Transportation for an Initial Site Assessment Form Issuance. The WC2035 Plan allows credit for any uses that were active on or subsequent to January 1, 2008 to be deducted from a Project's mobility fee. The Project Site is currently improved with the 10 Existing Buildings (10 one-story buildings, 1 two-story building and 1 three-story building), which have a combined total floor area

of approximately 340,339 square feet, including approximately 3,000 square feet of restaurant floor area and approximately 18,300 square feet of health club floor area. The lot area (before dedications) is 1,062,923 square feet. Based on the total existing floor area and the lot area (before dedications), the total existing FAR is approximately 0.32:1. Based on Section 7.3.2 of the WC2035 Plan and the existing uses located on the Project Site, it is anticipated that mobility fee credits would be applied to the mobility fee calculation for the Project. The Applicant will submit additional information on any in-lieu credits for mitigation measures and dedications at a later time. LADOT would assign traffic mitigation measures to the Project, from the list of such measures described in Appendix E to the WC2035 Plan, that are commensurate with the net mobility fee for the Project. The Project would require an 18-foot dedication along De Soto Avenue and 2-foot dedication along Burbank Boulevard, consistent with Tables 1 and 2 in the WC2035 Plan Street Standards. Finally, in compliance with WC2035 Plan Section 7.8.1.2, the Applicant would join the Transportation Management Organization (TMO) and comply with the TMO's goals and objectives as outlined in the WC2035 Plan.

Section 9 (Cultural Amenities): The Project is subject to the "Warner Center Cultural Amenities Development Fee" (at the same rate as the Citywide Arts Development Fee) for the proposed uses, based on the expected building permit valuation of $500,000 or more for those commercial/office uses.

Appendix F (Urban Design Guidelines): The Project includes design features that are generally consistent with the Urban Design Guidelines set forth in Appendix F to the WC2035 Plan with respect to blocks, streets, street wall and ground floor, parking and access, architecture, onsite open space, landscape and stormwater treatment, streetscape improvements, signage, and cultural amenities.

For these reasons, the Project would not conflict with the applicable standards and requirements in the WC2035 Plan, some of which were adopted for the purpose of avoiding or mitigating an environmental effect. As such, this impact would be less than significant.

(c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As discussed in Section C (f) of this Tiered IS, Biological Resources, the WC2035 Plan area (which includes Project Site) is not located in any habitat conservation plan or natural community conservation plan (WC2035 Plan DEIR, p. 4.3-13). As such, implementation of the Project would not conflict with any such plans, and this environmental topic was adequately addressed in the WC2035 Plan FEIR.

11. Mineral Resources

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) stated that, in compliance with Section 15128 of the State CEQA Guidelines, the impact of the contemplated development in the

WC2035 Plan area (which includes the Project Site) on mineral resources had previously been determined to be less than significant and therefore was not analyzed in the WC2035 Plan FEIR. It stated that the WC2035 Plan area is already substantially urbanized that that implementation of the WC2035 Plan would have no impact on mineral resources. Therefore, buildout under the WC2035 Plan would not result in any (a) loss of availability of a known mineral resource that would be of value to the region and the residents of the state or (b) loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan within the WC2035 Plan area. (WC2035 Plan DEIR, pp. 5-6-7)

No Further Project Analysis Required

Based on the analysis in the WC2035 Plan FEIR, an evaluation of the Project's potential impacts on mineral resources is not required in this Tired IS because the WC2035 Plan FEIR has already determined that no development within the WC2035 Plan area, including development of the Project Site, would have a significant impact on mineral resources.

12. Noise

With regard to potential construction noise impacts, the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) stated that the onsite construction noise could reach a maximum noise level of 92 dBA at 50 feet. (WC2035 Plan DEIR, p. 4.9-12-13) The presumed ambient noise levels at residences were 50 dBA during the daytime and 40 dBA during the night. Therefore, construction activities lasting more than 10 days in a three-month period would exceed the presumed ambient exterior noise levels by five dBA or more at a sensitive use and would be considered a significant impact. (WC2035 Plan DEIR, p. 4.9-12) Accordingly, the WC2035 Plan FEIR included Mitigation Measures WC-NOI-1 through WC-NOI-8, all of which address construction noise, as discussed further below. However, the construction noise impact would be significant and unavoidable. (WC2035 Plan DEIR, p. 4.9-18-20) It also stated that construction noise impacts for individual projects should be evaluated further. (WC2035 Plan DEIR, p. 4.9-12)

With regard to potential construction vibration impacts, the WC2035 Plan FEIR stated that construction activities that may occur with implementation of the WC2035 Plan would have the potential to expose buildings to ground-borne vibration levels that may result in structural damage. (WC2035 Plan DEIR, p. 4.9-14) Accordingly, the WC2035 Plan FEIR included Mitigation Measures WC-NOI-9 to address construction vibration, as discussed further below. However, that impact would be significant and unavoidable. (WC2035 Plan FEIR, pp. 4.9-14, 19-20) The WC2035 Plan FEIR recommended that construction vibration impacts for individual projects should be evaluated further. (WC2035 Plan DEIR, p. 4.9-14)

With respect to potential traffic noise impacts, the WC2035 Plan FEIR determined that traffic noise for buildout under the WC2035 Plan would not exceed a threshold of increasing ambient noise levels by three dBA CNEL (to or within the "normally acceptable" or "clearly unacceptable" category), or by five dBA or greater under any circumstances, at all but one of the 54 roadway segments in and near the WC2035 Plan area. (WC2035 Plan DEIR, pp. 4.9-15-18) For eight segments of De Soto Avenue, the change in traffic noise ranged from a decrease of -2 dBA to an

increase of 1.3 dBA. (WC2035 Plan DEIR, p. 4.9-17) For two segments of De Soto Avenue, the maximum increase in traffic noise 0.5 dBA. (WC2035 Plan DEIR, p. 4.9-17)

The only roadway segment that would be significantly impacted was Variel Avenue between Victory Boulevard and Vanowen Street, where roadway traffic was predicted to increase ambient noise levels by 7.4 dBA. The closest end of this roadway segment is approximately 0.8 miles north of the Project Site. Variel Avenue continues south, but ends at the intersection of Califa Street just north of the Project Site. Therefore, traffic in the WC2035 Plan area would result in a significant increase in noise levels at sensitive receptors along Variel Avenue between Victory Boulevard and Vanowen Street, although the resultant noise level would still fall well within the normally acceptable range for multi-family housing. This impact would be significant and unavoidable. (WC2035 Plan DEIR, pp. 4.9-17, 20)

The WC2035 Plan FEIR stated that operational stationary noise sources would be subject to City requirements, such as the City's General Plan Noise Element Implementation Program P6, which would reduce potential stationary noise impacts by requiring appropriate design and insulation measures when processing building permits. Implementation Program P12 includes similar requirements with respect to discretionary permits. These requirements were expected to reduce stationary noise impacts to less than significant. (WC2035 Plan FEIR, pp. 4.9-8, 15)

Finally, the WC2035 Plan area is not located within two miles of a public airport and would have no impact with regard to 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, exposing people residing or working in the project area to excessive noise levels. (WC2035 Plan DEIR, p. 4.9-11)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended nine mitigation measures, designated as WC-NOI-1 through WC-NOI-9, with respect to potentially significant impacts related to noise and vibration. (WC2035 Plan FEIR, pp. V-21-22) Mitigation Measures WC-NOI-1, WC-NOI-2, and WC-NOI-8 only apply to LAUSD schools within 500 feet of the Project Site. The closest school (Woodland Hills Academy Middle School is farther than 500 feet from the boundary of the Project Site and therefore these mitigation measures are not applicable. Mitigation Measure WC-NOI-9 only applies to projects that require construction within 100 feet of an offsite building more than 70 years in age. Given that no construction associated with the Project would occur within 100 feet of any such building, Mitigation Measure WC-NOI-9 is not applicable to the Project and therefore is not described below.

WC-NOI-3: The City shall require that all construction activities within the WCRCCSP *[sic]* area be restricted to hours between 7:00 a.m. and 9:00 p.m., Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturday. No noise-generating construction activities shall be allowed on Sundays or national holidays.

WC-NOI-4: The City shall require that noise-generating construction equipment be equipped with the most effective state-of-the-art noise control devices, i.e.,

mufflers, lagging, or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

WC-NOI-5: The City shall require effective temporary noise barriers to be used and relocated, as needed, to block line-of-sight (sound) between the construction equipment and any noise sensitive receptors within 500 feet of a construction site.

WC-NOI-6: The City shall require that truck deliveries and haul routes, to the extent feasible, shall be directed away from the three LAUSD schools in the vicinity of Warner Center and not access construction sites from De Soto Avenue, along the lot line of Woodland Hills Academy Middle School or from Topanga Canyon Boulevard and Vanowen Street along the lot line of Canoga Park High School, or use Variel north of Warner Center to access project sites in Warner Center.

WC-NOI-7: The City shall require applicants for projects within Warner Center to notify schools in advance of construction activities. The construction manager's (or representative's) telephone number shall be provided with the notification so that each school may communicate any concerns.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's potentially significant and less than significant tiered impacts related to noise, and the applicable mitigation measures identified in the WC2035 Plan FEIR, are discussed below. Would the project:

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?

Onsite Construction

Less Than Significant Impact with Mitigation Incorporated. The WC2035 Plan FEIR evaluated construction noise impacts based on the potential for construction activities lasting more than one day to exceed the ambient exterior noise levels by 10 dBA or more at a sensitive use or construction activities lasting more than 10 days in a three-month period to exceed the ambient exterior noise levels by five dBA or more at a sensitive use. The WC2035 Plan FEIR determined that the onsite construction noise could reach a maximum noise level of 92 dBA at 50 feet at a typical construction site, which assumes the simultaneous use of various types of construction equipment at 50 feet and a noise attenuation rate of 6 dBA per doubling of distance for hard surfaces such as pavement. (WC2035 Plan DEIR, pp. 4.9-12-13) Based on the City's presumed ambient noise levels at residences of 50 dBA during the daytime and 40 dBA during the night, the WC2035 Plan FEIR concluded that construction activities could exceed the ambient noise level at a sensitive use and could be considered significant. Accordingly, the WC2035 Plan FEIR included Mitigation

Measures WC-NOI-1 through WC-NOI-8, all of which address construction noise. While the WC2035 Plan FEIR concluded that the construction noise impact with regard to the overall building under the WC2035 Plan would be significant and unavoidable, it also stated that construction impacts would need to be evaluated for individual projects. (WC2035 Plan DEIR, pp. 4.9-12-13, 20)

The proposed Project would require construction activities lasting more than 10 days during a three-month period. As stated in the WC2035 Plan FEIR, the construction noise threshold for construction activities lasting more than 10 days is a five dBA increase in noise levels over ambient noise levels. (WC2035 Plan DEIR, p. 4.9-10) In order to establish the appropriate site-specific significance criterion with regard to construction noise, ambient noise measurements were conducted at noise sensitive receptor locations near the Project Site, which are described in **Table B-18**, *Ambient Noise Measurements* and presented in **Figure B-5**, *Noise Measurements Locations*, below.

TABLE B-18
AMBIENT NOISE MEASUREMENTS

Receptor Location	Measured Ambient Noise Levels (dBA Leq)
Receptor 1	
Residential area east of the Project Site, De Soto Avenue 7/12/17 (11:49 A.M.)/Wednesday	71
Receptor 2	
Tutor Time daycare center north of the Project Site, Califa Street 7/12/17 (12:15 P.M.)/Wednesday	62
Receptor 3	
Woodland Hills Academy Middle School southeast of the Project Site, De Soto Avenue 7/12/17 (11:27 A.M.)/Wednesday	73
Receptor 4	
Kaiser Permanente Woodland Hills Medical Center south of the Project Site, De Soto Avenue 7/12/17 (11:27 A.M.)/Wednesday	73

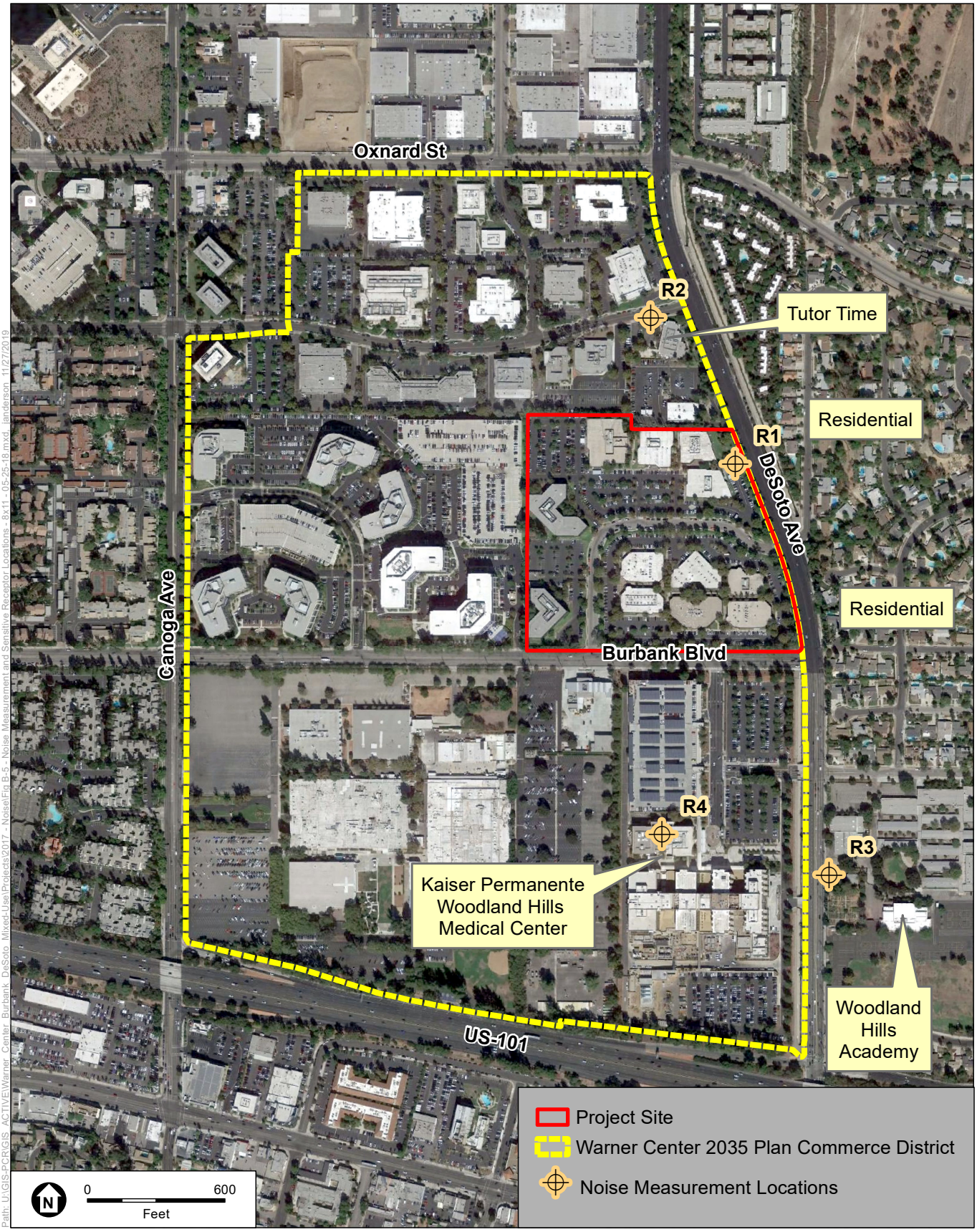
Note: The Kaiser Permanente Medical Center is located approximately 213 meters (700 feet) to the south of the Project Site. The ambient noise measurement taken for Woodland Hills Academy Middle School (Receptor 3) is also used as the ambient noise measurement for for the medical center (Receptor 4) since they are approximately the same distance and same direction from the Project Site. The ambient noise environment would be similar at both receptors, and the application of the Receptor 3 ambient noise measurement to Receptor 4 is a conservative application because Receptor 4 is located approximately 44 feet farther from the Project Site than Receptor 3, which is approximately 200 meters (656 feet) from the Project Site.

Source: ESA, 2018.

As shown in Table B-18, the ambient noise level at Receptor 1, which is the closest boundary of the closest noise-sensitive residential use to the Project Site, located approximately 50 meters (164 feet) east of the Project Site, was measured at 71 dBA Leq. The ambient noise level at Receptor 2, which is the closest boundary of the noise-sensitive Tutor Time, located approximately 107 meters (350 feet) to the north of the Project Site, was measured at 62 dBA Leq. The ambient noise level at

Receptor 3, which is the closest boundary of the noise-sensitive Woodland Hills Academy Middle School, located approximately 177 meters (580 feet) to the southeast of the Project Site, was measured at 73 dBA Leq. The ambient noise level at Receptor 4, which is the closest occupied building in the noise-sensitive Kaiser Permanente Woodland Hills Medical Center to the Project Site, located approximately 213 meters (700 feet) to the south of the Project Site, was measured at 73 dBA Leq. The ambient noise measurement taken for Woodland Hills Academy Middle School (Receptor 3) was used for the medical center since they are approximately the same distance and same direction from the Project Site. The ambient noise environment would be similar at both receptors. The application of the Receptor 3 ambient noise measurement to Receptor 4 is a conservative application for two reasons. First, Receptor 4 is located approximately 120 feet farther from the Project Site than Receptor 3. Second, the Kaiser parking garage, which is located between the medical center and the Project Site, would, to a substantial extent, block construction noise associated with the development of the Project.

Therefore, the significance threshold (ambient noise plus 5 dBA) for construction noise impacts would be 76 dBA Leq at the residential area east of the Project Site (Receptor 1), 67 dBA Leq at Tutor Time (Receptor 2), 78 dBA Leq at Woodland Hills Academy Middle School (Receptor 3), and 78 dBA Leq at Kaiser Permanente Woodland Hills Medical Center (Receptor 4).



SOURCE: Google Earth, 2016

De Soto / Burbank Master Plan Project

Figure B-5
Noise Measurement and Sensitive Receptor Locations

ESA

The WC2035 Plan FEIR did not evaluate the construction noise effects of high-impact equipment, such as pile drivers, sonic pile drivers, and caisson drilling. However, because the development of the Project may require the use of high-impact equipment, the construction noise impact associated with that equipment is addressed below. The use of high-impact equipment is not anticipated to be used for the construction of New Buildings 1, 2, 3, 4a, 5 and 6, which are lower-rise buildings for residential and hotel uses, while high-impact equipment could be required for the construction of New Buildings 4, 7, 8 and 9, which are higher-rise office buildings. High-impact construction equipment would likely not be used simultaneously with other construction. However, the analysis below conservatively assumes that such equipment would be used simultaneously. Thus, construction noise impacts have been analyzed for three scenarios: (1) construction equipment noise without high-impact equipment; (2) high-impact equipment noise; and (3) combined construction equipment noise with simultaneous high-impact equipment noise.

The construction noise analysis for the three scenarios incorporate conservative assumptions to evaluate maximum potential construction noise impacts. These assumptions include the use of multiple high-noise generating, heavy-duty construction equipment in use simultaneously (i.e., dozer, truck, grader/scraper, and pile driver for the high-impact equipment scenarios) and that the equipment would be in use at the locations closest to the noise sensitive receptors. These assumptions result in conservatively estimated noise levels at the noise sensitive receptors because multiple pieces of construction equipment cannot physically be located at the same location closest to the noise sensitive receptors. Construction equipment is actually spread across a construction site, rather than concentrated close to the nearest noise-sensitive receptors, which results in lower noise levels due to distance attenuation of noise. As such, noise from other equipment spread across a construction site would be masked by the noise from the multiple (three to four) high-noise generating, heavy-duty construction equipment that is assumed to be used at the location nearest to the noise sensitive receptors and would not contribute to an increase in the noise levels as measured in the decibel scale. Thus, this section presents conservatively estimated maximum construction noise levels for the Project for the three scenarios, as presented below.

Construction Equipment Noise with Non-High-Impact Equipment

Consistent with the noise analysis in the WC2035 Plan FEIR, construction of the Project would generate onsite construction noise that could reach a maximum noise level of 92 dBA at 50 feet, which assumes multiple concurrent construction equipment in use at the same time at 50 feet. Some of the project construction could occur in overlapping phases. Specifically, (1) Phase 1 building construction, paving, and architectural coating could overlap with Phase 2 demolition and site preparation construction activities and (2) Phase 5 and Phase 6 construction could fully overlap. This potential overlapping construction was taken into account in the analysis below. The Project Site is currently paved; therefore, as discussed below, the noise attenuation rate for hard surfaces assumed in the WC2035 Plan FEIR is applicable to the Project.

The nearest noise-sensitive uses to the Project Site are farther than 50 feet from the Project Site. As stated above, the nearest noise-sensitive use is Receptor 1, which corresponds to the residential area located approximately 50 meters (164 feet) east of the Project Site. The next nearest sensitive use is Receptor 2, which corresponds to Tutor Time of Woodland Hills, located at 5855 De Soto

Avenue, approximately 107 meters (350 feet) north of the Project Site. As stated in the California Department of Transportation's (DOT) *Technical Noise Supplement* (TeNS), noise attenuation is calculated by comparing the reference level of 92 dBA Leq at 50 feet and applying an attenuation factor of 6 dBA per doubling of distance for hard surfaces. (California DOT TeNS, Section 2.1.4.2)

As shown on **Table B-19**, *Unmitigated and Mitigated Construction Noise Levels* (see Appendix I to this Tiered IS for noise impact calculations), with respect to Receptor 1, without any mitigation and no use of high-impact equipment, the maximum construction noise level of 92 dBA Leq at 50 feet would attenuate to 82 dBA Leq at 164 feet. When added to the ambient noise level at Receptor 1 of 71 dBA Leq, the noise level experienced would remain at 82 dBA Leq, which would exceed the significance criterion of 76 dBA Leq (ambient level of 71 dBA Leq plus 5 dBA threshold).

As shown on Table B-19, with respect to Receptor 2, without mitigation or the use of high-impact equipment, the maximum construction noise level of 92 dBA Leq at 50 feet would attenuate to approximately 75 dBA Leq at 350 feet (i.e., at Receptor 2) from the Project Site. When added to the ambient noise level of 62 dBA Leq, the noise level experienced at Receptor 2 would remain at 75 dBA Leq, which would exceed the applicable significance criterion of 67 dBA Leq (ambient plus 5 dBA) at Receptor 2.

TABLE B-19
UNMITIGATED AND MITIGATED CONSTRUCTION NOISE LEVELS

			No High-Impact Equipment [a]		High-Impact Equipment		Combined Equipment (High-Impact and Other Equipment)	
Receptor Location	**Distance to Receptor**	**Ambient Noise Level (dBA Leq) / Threshold (Ambient plus 5 dBA)**	**Unmitigated Noise Level plus Ambient (dBA Leq)**	**Mitigated Noise Level plus Ambient [b] (dBA Leq)**	**Unmitigated Noise Level plus Ambient (dBA Leq)**	**Mitigated Noise Level plus Ambient [b] (dBA Leq)**	**Unmitigated Noise Level plus Ambient (dBA Leq)**	**Mitigated Noise Level plus Ambient [b] (dBA Leq)**
Receptor 1								
Residential area east of the Project Site, De Soto Avenue	164 feet	71 / 76	82	73	85	72	87	74
Receptor 2								
Tutor Time daycare center north of the Project Site, Califa Street	350 feet	62 / 67	75	65	82	63	80	66
Receptor 3								
Woodland Hills Academy Middle School southeast of the Project Site, De Soto Avenue	580 feet	73 / 78	75	Mitigation Not Required	76	Mitigation Not Required	80	75
Receptor 4								
Kaiser Permanente Woodland Hills	700 feet	73 / 78	74.5	Mitigation Not Required	75.5	Mitigation Not Required	76.5	Mitigation Not Required

Medical Center south of the Project Site, De Soto Avenue			

[a] The evaluation of non-high-impact construction equipment noise in this analysis refers to noise at a typical construction site as discussed in the WC2035 Plan FEIR (WC2035 Plan DEIR, pp. 4.9-12-13).
[b] The mitigated noise levels for Receptors 1 and 2 include implementation of Mitigation Measures WC-NOI-4 and WC-NOI-5.
Source: ESA, 2018.

As shown on Table B-19, with respect to Receptor 3, without mitigation or the use of high-impact equipment, the maximum construction noise level of 92 dBA Leq at 50 feet would attenuate to approximately 71 dBA Leq at 580 feet (i.e., at Woodland Hills Academy Middle School) from the Project Site. When added to the ambient noise level of 73 dBA Leq, the noise level experienced at Receptor 3 would be 75 dBA Leq, which would be less than the applicable significance criterion of 78 dBA Leq (ambient plus 5 dBA) at Receptor 3. Therefore, the non-high-impact construction noise impact at Receptor 3 would be less than significant and no mitigation would be required.

As shown on Table B-19, with respect to Receptor 4, without mitigation or the use of high-impact equipment, the maximum construction noise level of 92 dBA Leq at 50 feet would attenuate to approximately 69 dBA Leq at 700 feet (i.e., at Kaiser Permanente Woodland Hills Medical Center) from the Project Site. When added to the ambient noise level of 73 dBA Leq, the noise level experienced at Receptor 4 would be 74.5 dBA Leq, which would be less than the applicable significance criterion of 78 dBA Leq (ambient plus 5 dBA) at Receptor 4. Therefore, the non-high-impact construction noise impact at Receptor 4 would be less than significant and no mitigation would be required. As previously stated, the Kaiser parking garage, which is located between the medical center and the Project Site, would, to a substantial extent, block construction noise associated with the development of the Project. However, the noise levels stated above do not assume attenuation from the garage in order to provide a more conservative estimate.

Therefore, feasible mitigation is required with respect to the construction noise impacts associated with Receptor 1 and Receptor 2 (see Appendix I to this Tiered IS for noise impact calculations). The mitigation scenarios discussed below and summarized in Table B-19 are based on compliance with Mitigation Measures WC-NOI-4 and WC-NOI-5.

Mitigation Measure WC-NOI-4 requires the use of equipment be fitted with state-of-the-art noise control devices (i.e. mufflers, lagging, or motor enclosures). According to the L.A. CEQA Thresholds Guide, use of adequate mufflers systems can achieve reductions in noise levels of up to 3 dBA. (L.A. CEQA Thresholds Guide, p. I.1-9) With incorporation of WC-NOI-4 and no use of high-impact equipment, the noise level at Receptor 1 (the residential area east of the Project Site) would attenuate from 82 dBA Leq to 79 dBA Leq at 164 feet, and the noise level at Receptor 2 (Tutor Time) would attenuate from 75 dBA Leq to 72 dBA Leq at 350 feet.

Mitigation Measure WC-NOI-5 requires the use and relocation of noise barriers, as needed, during construction activities, to block line-of-sight (sound) between construction equipment and any noise-sensitive receptors within 500 feet of a construction site. Temporary noise barriers would be

installed, as needed, during each of the eight construction phases. Noise barriers would, to the extent required and feasible, surround the entire active construction area(s). In order to achieve effective sound attenuation, noise barriers would be approximately 12 feet in height and rated for a minimum of a 10 dBA reduction. Noise barriers could be made out of multi-layered sound-insulating materials, metal, wood, or any other material that limits the sensitive receptors' line-of-sight to the construction site and would achieve a 10 dBA reduction in noise levels. Any equipment operating outside of the confines of a noise barrier (e.g. generator sets) would require a portable noise shelter or housing to limit the noise and rated at the same 10 dBA reduction as the larger noise barrier. Similarly, if the noise barrier cannot form a continuous wall surrounding the construction area (i.e. to allow for access gates, etc.), portable shields would be used to cover gaps while simultaneously allowing access to construction site. Note that noise barriers do have limitations once the building structure reaches a height greater than the barrier and construction activity is within line-of-sight of sensitive receptors. However, the most noise-intensive construction phase involves grading and excavation and the construction noise during that phase that would be at or below ground level and therefore shielded by noise barriers. Additional details regarding the duration of each phase and the equipment mix that will be used in each phase can be found in Appendix A, Air Quality – CalEEMod Output Files. With incorporation of Mitigation Measure WC-NOI-5, the noise level at Receptor 1 (the nearest noise-sensitive residential use to the east of the Project Site) would be reduced by 10 dBA, further reducing the noise level from 79 dBA Leq to 69 dBA Leq at 164 feet. When added to the ambient noise level at Receptor 1 of 71 dBA Leq, the noise level would be 73 dBA Leq (as shown on Table B-19), which would not exceed the significance criterion of 76 dBA Leq (ambient level of 71 dBA Leq plus 5 dBA threshold). At Receptor 2 (the Tutor Time noise-sensitive use to the north of the Project Site), the noise level would be further reduced from 72 dBA Leq to 62 dBA Leq. When added to the ambient noise level at Receptor 2 of 62 dBA Leq, the noise level would be 65 dBA Leq (as shown on Table B-19), which would not exceed the significance criterion of 67 dBA Leq (ambient level of 62 dBA Leq plus 5 dBA threshold).

Therefore, with the implementation of Mitigation Measures WC-NOI-4 and WC-NOI-5, and without the use of high-impact equipment, the Project's construction noise impact at Receptor 1 (the residential area east of the Project Site) would be reduced to below the significance threshold of 76 dBA Leq (ambient noise plus 5 dBA). With the implementation of Mitigation Measures WC-NOI-4 and WC-NOI-5, the Project's construction noise impact at Receptor 2 (Tutor Time) would be reduced to below the significance threshold of 67 dBA Leq (ambient noise plus 5 dBA). Therefore, the Project's construction noise impacts at Receptors 1 and 2 would be less than significant with mitigation.

High-Impact Equipment Noise

The WC2035 Plan FEIR did not address the potential use of high-impact equipment in its noise analysis. However, as discussed in the *Geologic and Geotechnical Report, Proposed Multi-story Buildings with Subterranean Parking, Lots 1 through 12, Tract 42011, Woodland Hills, California* (April 24, 2017), prepared by GeoSoils Consultants, Inc., the Project could require the use of high-impact equipment for the construction of the office buildings, which include New Buildings 4, 7, 8 and 9. (GeoSoils Consultants, Inc., p. 12) According to the FHWA's *Roadway Construction Noise*

Model (RCNM), high-impact equipment is capable of generating noise levels of 95 dBA Leq at 50 feet. (FHWA, RCNM (2006), p. 6)

At Receptor 1, the noise level from high-impact equipment without mitigation would be 85 dBA Leq at 164 feet. As shown on Table B-19, when added to the ambient noise level at Receptor 1 of 71 dBA Leq, the noise level would remain at 85 dBA Leq, which would exceed the significance criterion of 76 dBA Leq (ambient level of 71 dBA Leq plus 5 dBA threshold). At Receptor 2, the noise level from high-impact equipment without mitigation would be 78 dBA Leq at 350 feet. As shown on Table B-19, when added to the ambient noise level at Receptor 2 of 62 dBA Leq, the noise level would remain at 78 dBA Leq, which would exceed the significance criterion of 67 dBA Leq (ambient level of 62 dBA Leq plus 5 dBA threshold). At Receptor 3, the noise level from high-impact equipment without mitigation would be 74 dBA Leq at 580 feet. As shown on Table B-19, when added to the ambient noise level at Receptor 3 of 73 dBA Leq, the noise level would be 76 dBA Leq, which would not exceed the significance criterion of 78 dBA Leq (ambient level of 73 dBA Leq plus 5 dBA threshold). At Receptor 4, the noise level from high-impact equipment without mitigation would be 72 dBA Leq at 700 feet. As shown on Table B-19, when added to the ambient noise level at Receptor 4 of 73 dBA Leq, the noise level would be 75.5 dBA Leq, which would not exceed the significance criterion of 78 dBA Leq (ambient level of 73 dBA Leq plus 5 dBA threshold). As previously stated, the Kaiser parking garage, which is located between the medical center and the Project Site, would, to a substantial extent, block construction noise associated with the development of the Project. However, the noise levels stated above do not assume attenuation from the garage in order to provide a more conservative estimate.

Mitigation Measure WC-NOI-4 requires equipment to be equipped with state-of-the-art noise control devices, such as equipment enclosures. According to a study by the EPA's Office of Noise Abatement and Control, enclosures for high-impact equipment are capable of reducing impact equipment noise by 11 dBA, resulting in a noise level of approximately 84 dBA Leq at 50 feet. (WC2035 Plan FEIR p. 4.9-13; Kessler, 2005) Therefore, implementation of Mitigation Measure WC-NOI-4 would reduce the Project's construction noise level from high-impact equipment to below the construction noise levels disclosed in the WC2035 Plan FEIR for non-high-impact equipment. (WC2035 Plan FEIR pp. 4.9-13) With Mitigation Measure WC-NOI-4, the noise level at Receptor 1 of 85 dBA Leq at 164 feet for high-impact equipment would be reduced by 11 dBA to 74 dBA Leq at 164 feet. The noise level at Receptor 2 of 78 dBA Leq at 350 feet would be reduced by 11 dBA to 67 dBA Leq at 350 feet.

With the implementation of Mitigation Measure WC-NOI-5, the noise levels would be reduced by an additional 10 dBA, reducing the noise level at Receptor 1 from 74 dBA Leq at 164 feet to 64 dBA Leq at 164 feet. When added to the ambient noise level at Receptor 1 of 71 dBA Leq, the noise level would be 72 dBA Leq (as shown on Table B-19), which would not exceed the significance criterion of 76 dBA Leq (ambient level of 71 dBA Leq plus 5 dBA threshold). At Receptor 2, the noise level would be reduced from 67 dBA Leq at 350 feet to 57 dBA at 350 feet. When added to the ambient noise level at Receptor 2 of 62 dBA Leq, the noise level would be 63 dBA Leq (as shown on Table B-19), which would not exceed the significance criterion of 67 dBA Leq (ambient level of 62 dBA Leq plus 5 dBA threshold). Therefore, with implementation of

Mitigation measures WC-NOI-4 and WC-NOI-5, the noise level of high-impact equipment would be reduced to below the significance threshold of a 5 dBA increase at Receptors 1 and 2.

Combined Construction Equipment Noise With Both Non-High-Impact and High-Impact Equipment

It is possible that high-impact equipment could be used simultaneously with non-high-impact equipment. The combined noise level from non-high-impact equipment and high-impact equipment would be 97 dBA Leq at 50 feet without mitigation (i.e., 92 dBA Leq from non-high-impact equipment at 50 feet plus 95 dBA Leq from high-impact equipment at 50 feet equals 97 dBA Leq at 50 feet). At Receptor 1, the combined equipment noise levels would be 87 dBA Leq (82 dBA Leq from non-high-impact equipment plus 85 dBA Leq from high-impact equipment equals 87 dBA Leq) without mitigation. When added to the ambient noise level at Receptor 1 of 71 dBA Leq, the noise level would remain at 87 dBA Leq, which would exceed the significance criterion of 76 dBA Leq (ambient level of 71 dBA Leq plus 5 dBA threshold). However, with the implementation of Mitigation Measures WC-NOI-4 and WC-NOI-5, the combined noise level for the simultaneously operating construction equipment would be reduced to 70 dBA Leq (69 dBA Leq from non-high-impact equipment plus 64 dBA Leq from high-impact equipment equals 70 dBA Leq). When added to the ambient noise level at Receptor 1 of 71 dBA Leq, the noise level would be 74 dBA Leq, as shown in Table B-19, which would not exceed the significance criterion of 76 dBA Leq (ambient level of 71 dBA Leq plus 5 dBA threshold).

The combined noise level without mitigation at Receptor 2 would be 80 dBA Leq (75 dBA Leq from non-high-impact equipment plus 78 dBA Leq from high-impact equipment equals 80 dBA Leq). When added to the ambient noise level at Receptor 2 of 62 dBA Leq, the noise level would remain at 80 dBA Leq, which would exceed the significance criterion of 67 dBA Leq (ambient level of 62 dBA Leq plus 5 dBA threshold). With implementation of Mitigation Measures WC-NOI-4 and WC-NOI-5, the combined noise level at Receptor 2 would be 63 dBA Leq (62 dBA Leq from non-high-impact equipment plus 57 dBA Leq from high-impact equipment equals 63 dBA Leq). When added to the ambient noise level at Receptor 2 of 62 dBA Leq, the noise level would be 66 dBA Leq, which would not exceed the significance criterion of 67 dBA Leq (ambient level of 62 dBA Leq plus 5 dBA threshold). Therefore, the Project's construction noise impact at Receptor 2 with mitigation would be less than significant and less than disclosed in the WC2035 Plan FEIR.

The combined noise level without mitigation at Receptor 3 would be 76 dBA Leq (71 dBA Leq from non-high-impact equipment plus 74 dBA Leq from high-impact equipment equals 76 dBA Leq). When added to the ambient noise level at Receptor 3 of 73 dBA Leq, the noise level would be 80 dBA Leq, which would exceed the significance criterion of 78 dBA Leq (ambient level of 73 dBA Leq plus 5 dBA threshold). However, with implementation of Mitigation Measures WC-NOI-4 and WC-NOI-5, the combined noise level at Receptor 3 would be 69 dBA Leq (68 dBA Leq from non-high-impact equipment plus 63 dBA Leq from high-impact equipment equals 69 dBA Leq). When added to the ambient noise level at Receptor 3 of 73 dBA Leq, the noise level would be 75 dBA Leq, which would not exceed the significance criterion of 78 dBA Leq (ambient level of 73 dBA Leq plus 5 dBA threshold). Therefore, the Project's construction noise impact at Receptor 3 with mitigation would be less than significant and less than disclosed in the WC2035 Plan FEIR.

The combined noise level without mitigation at Receptor 4 would be 74 dBA Leq (69 dBA Leq from non-high-impact equipment plus 72 dBA Leq from high-impact equipment equals 74 dBA Leq). When added to the ambient noise level at Receptor 4 of 73 dBA Leq, the noise level would be 76.5 dBA Leq, which would not exceed the significance criterion of 78 dBA Leq (ambient level of 73 dBA Leq plus 5 dBA threshold). Therefore, the Project construction noise impact at Receptor 4 would be less than significant and no mitigation would be required. As previously stated, the Kaiser parking garage, which is located between the medical center and the Project Site, would, to a substantial extent, block construction noise associated with the development of the Project. However, the noise levels stated above do not assume attenuation from the garage in order to provide a more conservative estimate.

Additional Construction Noise Analysis for Woodland Hills Academy Middle School

The LAUSD considers noise level increases of 3 dBA or more over ambient noise levels to constitute a significant impact on an existing school.[106] The Woodland Hills Academy Middle School, located approximately 177 meters (580 feet) to the southeast of the Project Site, is an existing LAUSD school. Therefore, according to LAUSD's internal noise threshold, a noise level increases of 3 dBA or more over ambient noise levels at the Woodland Hills Academy Middle School would be considered a significant impact.

As shown previously in Table B-18, the existing ambient noise level at Receptor 3 (Woodland Hills Academy Middle School) is 73 dBA Leq. Based on the LAUSD significance criterion for existing schools, the significance threshold at Receptor 3 would be 76 dBA Leq (73 dBA Leq ambient plus 3 dBA). Based on this threshold of 76 dBA Leq, the Project's noise impact at Receptor 3 has been analyzed for three scenarios: (1) construction equipment noise with non-high-impact equipment; (2) high-impact equipment construction noise; and (3) combined construction equipment noise with both non-high-impact and high-impact equipment.

Construction Equipment Noise With Non-High-Impact Equipment

At Receptor 3, without high-impact equipment, the maximum construction equipment noise level of 92 dBA Leq at 50 feet would attenuate to approximately 71 dBA Leq at 580 feet (i.e., at the Woodland Hills Academy Middle School) from the Project Site. As shown in **Table B-20**, *Unmitigated and Mitigated Construction Noise Levels – Receptor 3 (LAUSD Threshold)* (see Appendix I to this Tiered IS for noise impact calculations), without any mitigation and no use of high-impact equipment, when added to the ambient noise level of 73 dBA Leq, the noise level experienced at Receptor 3 would be 75 dBA Leq, which would not exceed the significance criterion of 76 dBA Leq (ambient plus 3 dBA) at Receptor 3. Therefore, this impact would be less than significant and no mitigation would be required (see Appendix I to this Tiered IS for noise impact calculations).

TABLE B-20
UNMITIGATED AND MITIGATED CONSTRUCTION NOISE LEVELS – RECEPTOR 3 (LAUSD THRESHOLD)

	No High-Impact Equipment [a]	High-Impact Equipment	Combined Equipment (High-Impact and Other Equipment)

[106] Correspondence, LAUSD Office of Environmental Health and Safety, June 5, 2018.

Receptor Location	Distance to Receptor	Ambient Noise Level (dBA Leq) / Threshold (Ambient plus 3 dBA)	Unmitigated Noise Level plus Ambient (dBA Leq)	Mitigated Noise Level plus Ambient [b] (dBA Leq)	Unmitigated Noise Level plus Ambient (dBA Leq)	Mitigated Noise Level plus Ambient [b] (dBA Leq)	Unmitigated Noise Level plus Ambient (dBA Leq)	Mitigated Noise Level plus Ambient [b] (dBA Leq)
Receptor 3								
Woodland Hills Academy Middle School southeast of the Project Site, De Soto Avenue	656 feet	73 / 76	75	Mitigation Not Required	76	73	80	75

[a] The evaluation of non-high-impact construction equipment noise in this analysis refers to noise at a typical construction site as discussed in the WC2035 Plan FEIR (WC2035 Plan DEIR, pp. 4.9-12-13).

[b] The mitigated noise levels for Receptor 3 includes implementation of Mitigation Measure WC-NOI-4.

Source: ESA, 2018.

High-Impact Equipment Noise

At Receptor 3, the noise level from high-impact equipment without mitigation would be 74 dBA Leq at 580 feet. As shown on Table B-20, when added to the ambient noise level at Receptor 3 of 73 dBA Leq, the noise level would be 76 dBA Leq, which would be equal to the significance criterion of 76 dBA Leq (ambient level of 73 dBA Leq plus 3 dBA threshold). Therefore, feasible mitigation would be required with respect to the construction noise impacts associated with Receptor 3 (see Appendix I to this Tiered IS for noise impact calculations).

Mitigation Measure WC-NOI-4 requires equipment to be equipped with state-of-the-art noise control devices, such as equipment enclosures. According to a study by the EPA's Office of Noise Abatement and Control, enclosures for high-impact equipment are capable of reducing impact equipment noise by 11 dBA, resulting in a noise level of approximately 84 dBA Leq at 50 feet. (WC2035 Plan FEIR p. 4.9-13; Kessler, 2005) With implementation of Mitigation Measure WC-NOI-4, the high-impact equipment noise level at Receptor 3 of 74 dBA Leq at 580 feet would be reduced by 11 dBA to 63 dBA Leq at 580 feet. As shown in Table B-20 (see Appendix I to this Tiered IS for noise impact calculations), when added to the ambient noise level at Receptor 3 of 73 dBA Leq, the noise level would be 73 dBA Leq at 580 feet, which would not exceed the significance criterion of 76 dBA Leq (ambient level of 73 dBA Leq plus 3 dBA threshold). Therefore, the Project's construction noise impact at Receptor 3 with Mitigation Measure WC-NOI-4 would be less than significant based on LAUSD's criterion. Mitigation Measure WC-NOI-5 would not be required to reduce noise levels to below the LAUSD significance criteria for Receptor 3.

Combined Construction Equipment Noise with Non-High-Impact and High-Impact Equipment

The combined noise level without mitigation at Receptor 3 would be 76 dBA Leq (71 dBA Leq from non-high-impact equipment plus 74 dBA Leq from high-impact equipment equals 76 dBA Leq). As shown in Table B-20, when added to the ambient noise level at Receptor 3 of 73 dBA Leq, the noise level would be 80 dBA Leq, which would exceed the significance criterion of 76 dBA Leq (ambient level of 73 dBA Leq plus 3 dBA threshold). With implementation of Mitigation Measure WC-NOI-4, the noise level from non-high-impact equipment would be reduced by

approximately 3 dBA and from high-impact equipment by 11 dBA. The combined noise level at Receptor 3 with implementation of Mitigation Measure WC-NOI-4 would be 69 dBA Leq (68 dBA Leq from non-high-impact equipment plus 63 dBA Leq from high-impact equipment equals 68 dBA Leq). As shown in Table B-20 (see Appendix I to this Tiered IS for noise impact calculations), when added to the ambient noise level at Receptor 3 of 73 dBA Leq, the noise level would be 75 dBA Leq, which would not exceed the significance criterion of 76 dBA Leq (ambient level of 73 dBA plus 3 dBA threshold). Implementation of Mitigation Measure WC-NOI-4 would be sufficient to reduce the combined non-high-impact and high-impact construction noise level at Receptor 3 to less than significant. Mitigation Measure WC-NOI-5 would not be required to reduce noise levels to below the LAUSD significance criterion for Receptor 3.

Conclusion for Onsite Construction Noise Impacts

For the reasons discussed above, the Project could potentially expose persons to, or generate, construction noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the Project's construction noise impacts would be reduced to less than significant with mitigation.

Traffic Noise

Significant and Unavoidable. The WC2035 Plan FEIR determined that traffic noise for buildout under the WC2035 Plan would not exceed a threshold of increasing ambient noise levels by three dBA CNEL (to or within the "normally acceptable" or "clearly unacceptable" category), or by five dBA or greater under any circumstances, at all but one of the 54 roadway segments in and near the WC2035 Plan area. (WC2035 Plan DEIR, pp. 15-18) For eight segments of De Soto Avenue, the change in traffic noise ranged from a decrease of -2 dBA to an increase of 1.3 dBA (WC2035 Plan DEIR, p. 17). For two segments of De Soto Avenue, the maximum increase in traffic noise 0.5 dBA. (WC2035 Plan DEIR, p. 17)

The only segment that would be significantly impacted was Variel Avenue between Victory Boulevard and Vanowen Street, where roadway traffic was predicted to increase ambient noise levels by 7.4 dBA. (WC2035 Plan FEIR, p. 4.9-17) The closest end of this roadway segment is approximately 0.8 miles north of the Project Site. Variel Avenue continues south, but ends at the intersection of Califa Street just north of the Project Site. Therefore, traffic in the WC2035 Plan area would result in a significant increase in noise levels at sensitive receptors along Variel Avenue between Victory Boulevard and Vanowen Street and this impact would be significant and unavoidable. (WC2035 Plan DEIR, pp. 4.9-17, 20)

This analysis adequately addressed the Project's traffic noise impacts. The Project Site is located in TAZ 19, one of the 26 TAZs for the WC2035 Plan area that provided the basis for the traffic analysis in the WC2035 Plan FEIR. (WC2035 Plan DEIR, p. 4.12-39) Therefore, the traffic analysis in the WC2035 Plan FEIR included the anticipated traffic impacts associated with the redevelopment of the Project Site. Given that the traffic noise analysis in the WC0235 Plan FEIR

was based on the traffic analysis in the WC2035 Plan FEIR, the traffic noise analysis included the anticipated traffic impacts associated with the Project.[107]

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1, and this assumed development intensity was assigned to TAZ 19 for the traffic analysis. (WC2035 Plan DEIR, pp. 2-5-6) In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced traffic noise impact as compared to the impact assumed in the WC2035 Plan FEIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's traffic noise impacts.

The roadway traffic volume data provided in the Traffic Volume Review prepared for the Project (see Appendix K to this Tiered IS) includes data further demonstrating that traffic noise analysis in the WC2035 Plan FEIR adequately addressed the Project's traffic noise impact. Specifically, the Traffic Volume Review includes data for two roadway segments on Burbank Boulevard and De Soto Avenue that would be affected by project-related vehicle trips. The traffic noise levels along those roadway segments were analyzed using the Federal Highway Administration's Traffic Noise Model (FHWA TNM) and the Caltrans Technical Noise Supplement (TeNS) method. A comparison was drawn between the Project's traffic noise levels at full buildout and the WC2035 Plan's previously calculated future with project noise levels. (WC2035 Plan DEIR, pp. 4.9-15-17) **Table B-21**, *WC2035 Plan and Project Future Traffic Noise Levels*, summarizes the comparison (see Appendix I to this Tiered IS for noise impact calculations).

TABLE B-21
WC2035 PLAN AND PROJECT FUTURE TRAFFIC NOISE LEVELS (DBA)

Roadway Segment	2035 Project Full Buildout	WC2035 Future w/Project	Difference (Project – WC2035 Plan)
De Soto Avenue between Ventura Boulevard and Oxnard Street	68.4	69.7	-1.3
Burbank Boulevard between Topanga Canyon Boulevard and De Soto Avenue	65.2	63.6	1.6

Source: Gibson Transportation Consulting, 2017; ESA, 2018; WC2035 Plan DEIR, Appendix F – Noise Modeling.

The Project would have a minimal impact on the one roadway segment that would be significantly impacted by full buildout under the WC2035 Plan (Variel Avenue between Victory Boulevard and Vanowen Street) due to (1) its distance from the Project Site, (2) the layout of the circulation system

[107] Subsequent to the completion of the Preliminary Driveway Traffic Volume Review De Soto/Burbank Master Plan Project (Gibson Transportation Consulting, Inc., 2017), the Project was slightly refined by the Applicant. As originally analyzed in the traffic review, Building 3 included 254 dwelling units. The residential component of Building 3 has been reduced by 20 dwelling units, resulting in a lower count of 234 dwelling units. Relative to trip generation, this results in a reduction of 95 daily trips with seven fewer AM and eight fewer PM peak hour trips. Given that the traffic review was based on a higher dwelling unit count and higher net new trip generation, the findings of the traffic review are conservative and not changed by the refined Project.

between the project access points and that intersection, including that Variel Avenue does not provide direct access to the Project Site, and (3) the fact that a substantial portion of project traffic would be distributed to the US-101 Ventura Freeway, which is in the opposite direction from the Variel Avenue segment.

In any event, a second-tier CEQA document is not required to re-analyze a significant impact that is not susceptible to being mitigated to a level of insignificance. Cal. Pub. Res. Code § 21068.5; State CEQA Guidelines § 15152(f). The WC2035 Plan FEIR concluded that buildout under the WC2035 Plan would have significant traffic noise impact with respect to one roadway segment along Variel Avenue between Victory Boulevard and Vanowen Street. It determined that this significant impact could not be mitigated and was therefore unavoidable.

Accordingly, while the Project's incremental contribution to the one significant traffic noise impact identified in the WC2035 Plan FEIR would be very limited, the impact would be significant and unavoidable, but was adequately addressed in the WC2035 Plan FEIR.

Stationary Sources

Less Than Significant Impact. The WC2035 Plan FEIR stated that individual development projects would include new stationary sources would increase ambient noise levels. Operational stationary noise sources would be subject to City requirements, such as the City's General Plan Noise Element Implementation Program P6, which would reduce potential impacts by requiring appropriate design and insulation measures when processing building permits. Implementation Program P12 includes similar requirements with respect to discretionary permits. The WC2035 Plan FEIR concluded that these requirements would reduce stationary noise impacts to less than significant. (WC2035 Plan FEIR, pp. 4.9-8, 15)

This analysis and conclusion applies to the Project with equal force. The Project includes a mix of land uses that were contemplated in the WC2035 Plan FEIR and permitted in the WC2035 Plan. Therefore, the Project includes new stationary noise sources, such as rooftop air conditioning units, generators, and fans, that were evaluated in the WC2035 Plan FEIR. Project mechanical equipment would be located on rooftops or within buildings, and would be shielded from nearby land uses by rooftop parapets and other design and insulation techniques, consistent with General Plan Noise Element Implementation Programs P6 and P12, to attenuate noise and avoid conflicts with adjacent uses.

Furthermore, all Project mechanical equipment would be designed with appropriate noise control devices, such as sound attenuators, acoustics louvers, or sound screen/parapet walls, to comply with noise limitations in Section 112.02 of the LAMC, which prohibit the noise from such equipment causing an increase in the ambient noise level of more than five decibels on any residential property. The Project would comply with the requirement to install mechanical equipment that would generate noise levels below this threshold, consistent with applicable regulatory requirements.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the

WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. (WC2035 Plan DEIR, pp. 2-5-6) In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced impact with respect to new stationary noise sources as compared to the impact assumed in the WC2035 Plan FEIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact with respect to new stationary noise sources.

For these reasons, the Project's impact from new stationary noise sources would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

(b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?

Offsite Vibration

Less Than Significant Impact. The WC2035 Plan FEIR stated that construction activities that may occur with implementation of the WC2035 Plan would have the potential to expose buildings to ground-borne vibration levels that may result in structural damage. Accordingly, the WC2035 Plan FEIR included Mitigation Measure WC-NOI-9 to ensure appropriate protection for buildings that are more than 70 years old that were more vulnerable to potential vibration impacts. It acknowledged, however, that Mitigation Measure WC-NOI-9 might not be sufficient to prevent damage to existing, fragile buildings in close proximity to a development site. It therefore concluded that construction vibration impact would be significant and unavoidable and stated that construction vibration impacts would need to be evaluated for individual projects. (WC2035 Plan DEIR, pp. 4.9-14, 19-20, WC2035 Plan FEIR, p. V-22)

Information regarding the proposed Project that was unknown at the time the WC2035 Plan FEIR was certified is now available to conduct a project-specific construction vibration analysis to evaluate the potential for offsite structural damage impacts to offsite buildings from project-related vibration. Construction machinery and operations can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. As stated in the WC2035 Plan FEIR and categorized in the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment* (2006), a peak particle velocity (PPV) of 0.5 inches per second can potentially result in damage of newer, more sturdy buildings (Category I buildings), while a PPV of 0.2 inches per second can potentially result in damage of non-engineered timber and masonry buildings (Category III). (WC2035 Plan DEIR, p. 4.9-14; FTA, 2006) The equipment that could be used for the construction of the Project that would generate ground vibration include impact pile drivers, sonic pile drivers, and caisson drilling.

Table B-22 *Off-Site Vibration Impacts by Construction Phase*, presents the different vibration scenarios for each piece of equipment for the nearest building in each direction from the Project Site (see Appendix I to this Tiered IS for vibration impact calculations).

TABLE B-22
OFF-SITE VIBRATION IMPACTS BY CONSTRUCTION PHASE

Receptor	Type of Building[a]	Equipment	Distance to Receptor (ft)[b]	Impact Level PPV (in/sec)	Threshold PPV (in/sec)	Exceeds Threshold?
Office parking garage to the west	Category I	Pile Driver (Impact)	30	0.490	0.5	No
		Pile Driver (Sonic)	30	0.129	0.5	No
		Caisson Drilling	30	0.068	0.5	No
Commercial building to the north	Category I	Pile Driver (Impact)	45	0.267	0.5	No
		Pile Driver (Sonic)	45	0.070	0.5	No
		Caisson Drilling	45	0.037	0.5	No
Residences to the east	Category III	Pile Driver (Impact)	150	0.044	0.2	No
		Pile Driver (Sonic)	150	0.012	0.2	No
		Caisson Drilling	150	0.006	0.2	No
School to the southeast	Category III	Pile Driver (Impact)	750	0.004	0.2	No
		Pile Driver (Sonic)	750	0.001	0.2	No
		Caisson Drilling	750	0.001	0.2	No
Hospital to the south	Category I	Pile Driver (Impact)	700	0.004	0.5	No
		Pile Driver (Sonic)	700	0.001	0.5	No
		Caisson Drilling	700	0.001	0.5	No

[a] Building categories established using guidelines found in FTA's Transit Noise and Vibration Impact Assessment (2006).

[b] Distance to receptor was estimated using satellite imagery from Google Earth and represents the minimum distance that the vibration-generating equipment would be used from the receptor, measured as a straight line distance between the vibration-generating equipment and the nearest existing offsite building.

Source: FTA, 2006; ESA, 2018

As shown in Table B-22, the vibration velocity during the construction of the Project would not exceed the vibration threshold of significance of 0.5 inches per second PPV for Category I buildings or the vibration threshold of 0.2 inches per second PPV for Category III buildings at the nearest offsite, vibration-sensitive structures.

Therefore, the Project would have a less-than-significant construction vibration impact with respect to offsite buildings.

Onsite Vibration

Less Than Significant Impact. Information regarding the proposed Project that was unknown at the time of the WC2035 Plan FEIR was certified is now available to conduct a project-specific construction vibration analysis to evaluate the potential for onsite structural damage to the Existing Buildings on the Project Site from project-related vibration. Construction machinery and operations can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. As stated in the WC2035 Plan FEIR, a PPV of 0.5 inches per second can result in damage of newer, more sturdy buildings (Category I buildings). (WC2035 Plan FEIR 4.9-14)

None of the Existing Buildings are Category III buildings. Therefore, the FTA significance threshold of a peak particle velocity (PPV) of 0.5 inches per second applies to this analysis. The equipment that could be used for the construction of the Project that would generate ground vibration include impact pile drivers, sonic pile drivers, and caisson drilling. **Table B-23**, *On-Site Vibration Impacts by Construction Phase*, presents the different vibration scenarios for each piece of equipment during each phase of construction (see Appendix I to this Tiered IS for vibration impact calculations). The impacts assessed were the vibration impacts to Existing Buildings from the phases of construction. Table B-23 shows the closest Existing Building to any given phase of construction and the calculated inches per second PPV level. Vibration impacts from Phase 8 of construction were not analyzed because all of the Existing Buildings would be removed at the time Phase 8 would be constructed.

TABLE B-23
ON-SITE VIBRATION IMPACTS BY CONSTRUCTION PHASE

Receptor	Type of Building[a]	Equipment	Distance to Receptor (ft)[b]	Impact Level PPV (in/sec)	Threshold PPV (in/sec)	Exceeds Threshold?
Phase I	Category I	Pile Driver (Impact)	45	0.267	0.5	No
		Pile Driver (Sonic)	45	0.070	0.5	No
		Pile Driver (Sonic)	45	0.037	0.5	No
Phase 2	Category I	Pile Driver (Impact)	350	0.012	0.5	No
		Pile Driver (Sonic)	350	0.003	0.5	No
		Caisson Drilling	350	0.002	0.5	No
Phase 3	Category I	Pile Driver (Impact)	300	0.015	0.5	No
		Pile Driver (Sonic)	300	0.004	0.5	No
		Caisson Drilling	300	0.002	0.5	No
Phase 4	Category I	Pile Driver (Impact)	265	0.019	0.5	No
		Pile Driver (Sonic)	265	0.005	0.5	No
		Caisson Drilling	265	0.003	0.5	No
Phase 5	Category I	Pile Driver (Impact)	295	0.016	0.5	No
		Pile Driver (Sonic)	295	0.004	0.5	No
		Caisson Drilling	295	0.002	0.5	No
Phase 6	Category I	Pile Driver (Impact)	225	0.024	0.5	No
		Pile Driver (Sonic)	225	0.006	0.5	No
		Caisson Drilling	225	0.003	0.5	No
Phase 7	Category I	Pile Driver (Impact)	215	0.026	0.5	No
		Pile Driver (Sonic)	215	0.007	0.5	No
		Caisson Drilling	215	0.004	0.5	No

[a] Building categories established using guidelines found in FTA's Transit Noise and Vibration Impact Assessment (2006).

[b] Distance to receptor was estimated using satellite imagery from Google Earth and represents the minimum distance that the vibration-generating equipment would be used from the receptor, measured as a straight line distance between the vibration-generating equipment and the nearest existing onsite building.

Source: ESA 2018

As shown in Table B-23, the vibration velocity during the construction of any phase of the Project would not exceed 0.5 inches per second PPV with respect to any of the Existing Buildings. In addition, while the Existing Buildings are not "offsite", some of them would remain in place during the construction on New Buildings (except of the construction of the final New Building). However, the existing Warner Center Corporate Park was constructed between 1981 and 1984 and is nearly at full occupancy with commercial tenants and no indication that the buildings are historic or otherwise fragile and therefore more susceptible to construction vibration impacts (as discussed in Section 5(a), above).

Therefore, the Project would have a less-than-significant construction vibration impact with respect to onsite buildings.

(c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Significant and Unavoidable Impact. The analysis provided in Section 12(a), above, addresses the potential for project operations to result in permanent increases in ambient noise levels in the project vicinity. The WC2035 Plan FEIR determined that stationary noise impacts would be less than significant, but that increases in traffic would result in significant and unavoidable noise levels in the future within the WC2035 Plan area.

As discussed above in Section 12(a), the Project's impact with respect to new stationary noise sources would be less than significant, consistent with the determination in the WC2035 Plan FEIR. The Project would marginally contribute to a significant traffic noise impact at one of 54 roadway segments (Variel Avenue between Victory Boulevard and Vanowen Street) evaluated in the WC2035 Plan FEIR, but that significant and unavoidable impact was not susceptible to mitigation Therefore, the Project's traffic noise impact was adequately addressed in the WC2035 Plan FEIR.

(d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant with Mitigation Incorporated. The analysis provided Section 12(a), above, addresses the potential for project construction to result in temporary or periodic increases in ambient noise levels in the project vicinity. According to the WC2035 FEIR, construction noise levels would potentially exceed the ambient noise level at a sensitive use, and concluded that this impact would be significant and unavoidable with regard to overall buildout under the WC2-35 Plan, but that construction impacts would need to be evaluated for individual projects.

Based on the project-specific construction noise analysis discussed above in Section 12(a), the construction noise level at Receptor 1 (residential area to the east of the Project Site), which represents the nearest noise-sensitive area, would be reduced to 70 dBA Leq (combined noise level from non-high-impact and high-impact equipment), based on the use of mufflers and a construction noise barrier in accordance with Mitigation Measures WC-NOI-4 and WC-NOI-5. When added to the ambient noise level of 71 dBA Leq, the combined noise level from non-high-impact and high-

impact equipment at Receptor 1 would be 74 dBA Leq. Therefore, with implementation of Mitigation Measures WC-NOI-4 and WC-NOI-5, the construction noise impact with respect to Receptor 1would be reduced to below the significance threshold of a 5 dBA increase over the ambient noise level.

The Project's construction noise impacts at Receptor 2, which represents Tutor Time, would be reduced to 63 dBA Leq (combined noise level from non-high-impact and high-impact equipment), based on the use of mufflers and a construction noise barrier in accordance with Mitigation Measures WC-NOI-4 and WC-NOI-5. When added to the ambient noise level of 62 dBA Leq, the combined noise level from non-high-impact and high-impact equipment at Receptor 2 would be 66 dBA Leq. Therefore, with implementation of Mitigation Measures WC-NOI-4 and WC-NOI-5, the construction noise impact with respect to Tutor Time would not exceed the significance threshold of 5 dBA over the ambient noise level.

The Project's construction noise impact at Receptor 3, which represents the Woodland Hills Academy Middle School, would be 75 dBA Leq without mitigation (combined noise level from non-high-impact and high-impact equipment). When added to the ambient noise level of 73 dBA Leq, the combined noise level from non-high-impact and high-impact equipment at Receptor 3 would be 77 dBA Leq without mitigation. Based on the City's significance threshold of 78 dBA Leq, the Project's construction noise impact with respect to Receptor 3 would be less than significant and no mitigation would be required.

Based on the LAUSD's criterion threshold of 76 dBA Leq, the combined noise level of 77 dBA Leq at Receptor 3 without mitigation from non-high-impact and high-impact equipment would exceed the threshold. With implementation of Mitigation Measure WC-NOI-4, the noise level would be reduced 68 dBA Leq (combined noise level from non-high-impact and high-impact equipment). When added to the ambient noise level of 73 dBA Leq, the combined noise level from non-high-impact and high-impact equipment at Receptor 3 would be 74 dBA Leq. Therefore, with implementation of Mitigation Measure WC-NOI-4, the Project's construction noise impact with respect to the Woodland Hills Academy Middle School would not exceed the LAUSD's criterion threshold of 76 dBA Leq. Mitigation Measure WC-NOI-5 would not be required for Receptor 3.

The Project's construction noise impact at Receptor 4, which represents the Kaiser Permanente Woodland Hills Academy Medical Center, would be 74 dBA Leq without mitigation (combined noise level from non-high-impact and high-impact equipment). When added to the ambient noise level of 73 dBA Leq, the combined noise level from non-high-impact and high-impact equipment at Receptor 3 would be 76.5 dBA Leq without mitigation. Based on the City's significance threshold of 78 dBA Leq, the Project's construction noise impact with respect to Receptor 4 would be less than significant and no mitigation would be required. As previously stated, the Kaiser parking garage, which is located between the medical center and the Project Site, would, to a substantial extent, block construction noise associated with the development of the Project. However, the noise levels stated above do not assume attenuation from the garage in order to provide a more conservative estimate.

Therefore, the Project's construction impact on these noise-sensitive receptors 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 area or within two miles of a public airport or public use airport. Therefore, construction or operation of the Project would not expose people to excessive airport related noise levels, so that no impact would occur.

(f) For a project located 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 within the vicinity of a private airstrip, or heliport or helistop. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels from such uses, and no impact would occur.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following eight mitigation measures, NOI-3 through NOI-7, from the WC2035 Plan FEIR are recommended to reduce or further reduce the Project's significant or less than significant noise and vibration impacts (these mitigation measures have been non-substantively modified to apply specifically to the Project):

NOI-3: The Applicant shall restrict construction hours to hours between 7:00 a.m. and 9:00 p.m., Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturday. No noise-generating construction activities shall be allowed on Sundays or national holidays.

NOI-4: The Applicant shall ensure that noise-generating construction equipment be equipped with the most effective state-of-the-art noise control devices, i.e., mufflers, lagging, or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

NOI-5: The Applicant shall ensure that temporary noise barriers to be used and relocated, as needed, to block line-of-sight (sound) between the construction equipment and any noise sensitive receptors within 500 feet of a construction site.

NOI-6: The Applicant shall ensure that truck deliveries and haul routes, to the extent feasible, shall be directed away from the three LAUSD schools in the vicinity of Warner Center and not access construction sites from De Soto Avenue, along the lot line of Woodland Hills Academy Middle School or from Topanga Canyon Boulevard and Vanowen Street along the

lot line of Canoga Park High School, or use Variel north of Warner Center to access project sites in Warner Center.

NOI-7: The Applicant shall notify schools in advance of construction activities. The construction manager's (or representative's) telephone number shall be provided with the notification so that each school may communicate any concerns.

13. Population and Housing

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) evaluated the WC2035 Plan's potential direct and indirect effects on population and housing, based in large part on projections and other information provided by the Southern California Association of Governments (SCAG) in its 2008 Regional Transportation Plan (2008 RTP). (WC2035 Plan DEIR, Section 4.10, Population, Housing and Employment)

Population

The WC2035 Plan FEIR determined that, based on a comparison between (1) the projected residential development under the WC2035 Plan through the year 2035 and (2) based on the 2008 RTP, the number of residential units that would be developed within the WC2035 Plan area if the WC2035 Plan was not approved, the contemplated development under the WC2035 Plan would result in population growth of approximately 43,464 additional residents. It further stated that this increase exceeded the population increase of 1,194 between 2008 and 2035 that was projected under the 2008 RTP. However, while the population increase exceeded what was projected under the 2008 RTP, the WC2035 Plan FEIR concluded that the contemplated development under the WC2035 Plan would result in a less-than-significant impact related to direct population growth because the WC2035 Plan would help meet the City's housing needs and concentrate population growth in a developed area that has existing infrastructure to handle population growth, consistent with the City's General Plan. (WC2035 Plan DEIR, pp. 4.10-9-10)

With respect to the potential for infrastructure to result in indirect population growth, the WC2035 Plan FEIR concluded that the WC2035 Plan provides for infill development that would make maximum use of existing infrastructure, and that significant regional public infrastructure upgrades for any utility, transportation, facility, or public service would not be required. As a result, it determined that the potential indirect population growth from any infrastructure improvements associated with the WC2035 Plan would be less than significant. (WC2035 Plan DEIR, p. 4.10-9)

Housing

With regard to housing, the WC2035 Plan FEIR noted that an important development strategy with respect to the WC2035 Plan is the creation of additional housing units. The WC2035 Plan FEIR stated that no removal of existing housing was expected, and the contemplated development under the WC2035 Plan could result in approximately 19,317 additional dwelling units. The WC2035

Plan FEIR found that (1) the construction of replacement housing to offset any loss of existing residential housing due to site-specific redevelopment and (2) no additional housing would be required outside of the WC2035 Plan area to replace any potentially displaced housing. Therefore, the WC2035 Plan FEIR concluded that buildout of the WC2035 Plan would help meet the City's housing needs and concentrate population growth in a developed area that has existing infrastructure to handle population growth, consistent with the City's General Plan (WC2035 Plan DEIR, pp. 4.10-9-10); therefore, the WC2035 Plan would result in a less than significant impact as a result of the overall net increase in housing. (WC2035 Plan DEIR, p. 4.10-10)

Employment

With regard to employment, the WC2035 Plan FEIR determined that buildout under the WC2035 Plan would result in a net increase of approximately 49,000 jobs that would be within walking distance of a balanced mix of uses and connected by frequent transit service. The WC2035 Plan FEIR stated that new employment under the WC2035 Plan would be consistent with various regional and local policies, and would not directly foster population and other growth by removing impediments to growth because the property surrounding the WC2035 Plan area was already developed with single-family and multi-family homes, and commercial and industrial uses. It also noted that the contemplated new non-residential and residential uses under the WC2035 Plan would help support the viability of existing businesses and promote a balanced mix of uses. The WC2035 Plan FEIR therefore concluded that impacts associated with employment would be less than significant. (WC2035 Plan DEIR, pp. 4.10-11-12)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR determined that the WC2035 Plan would have less than significant impacts on population growth, housing, and employment. Therefore, it did not recommend any mitigation measures with respect to those impacts. (WC2035 Plan DEIR, p. 4.10-12)

Project Impacts

Against the background described above, the Project's tiered impacts on population growth and housing are discussed below.

Would the project:

(a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. As previously discussed, the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) concluded that implementation of the WC2035 Plan would have a less than significant impact with respect to direct population growth (WC2035 Plan DEIR, pp. 4.10-9-10). While the projected population growth of 43,464 additional residents exceeded the 2008 SCAG projection of 1,194 additional residents, the WC2035 Plan FEIR concluded that buildout of the WC2035 Plan area would have a less-than-significant impact with respect to population growth

because the WC2035 Plan would help meet the City's housing needs and concentrate population growth in a developed area that has existing infrastructure to handle population growth, consistent with the City's General Plan (WC2035 Plan DEIR, pp. 4.10-9-10).

The analysis in the WC2035 Plan FEIR applies with equal force to the proposed Project. The residential component of the Project includes 1,009 multi-family units. Based on an average household size of 2.43 persons per multi-family unit, the Project's residential population would be 2,452 (United States Census Bureau, *2012-2016 American Community Survey, 5-Year Estimates*). These residential units would help meet the City's housing needs and concentrate growth in a developed area that has existing infrastructure to accommodate this population growth. This population growth is consistent with the residential development permitted in the Commerce District under the WC2035 Plan. Section 6.1.2.2.3 of the WC2035 Plan limits the residential portion of a project to 50 percent of the overall floor area. In comparison, residential floor area of the Project is approximately 45 percent, which is less than the 50 percent maximum.

As also discussed above, the WC2035 Plan FEIR concluded that the potential indirect population growth from any infrastructure improvements associated with the WC2035 Plan would be less than significant because (1) the WC2035 Plan provides for infill development that would make maximum use of existing infrastructure and (2) significant regional public infrastructure upgrades for any utility, transportation, facility, or public service would not be required. (WC2035 Plan DEIR, p. 4.10-9)

This analysis is fully applicable to the proposed Project. The Project Site is a fully developed urban site. The Project includes the development of the New Buildings to replace the Existing Buildings. The new, onsite infrastructure that would be constructed as part of the Project would connect to existing utility lines and streets.

As also discussed above, the WC2035 Plan FEIR determined that new employment under the WC2035 Plan would be consistent with various regional and local policies and would not directly foster population and other growth by removing impediments to growth because the property surrounding the WC2035 Plan area was already developed with single-family and multi-family homes, and commercial and industrial uses (WC2035 Plan DEIR, pp. 4.10-11-12). That analysis applies with equal measure to the proposed Project.

The development assumption for the Project Site in the WC2035 Plan FEIR further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact on population growth. The population growth attributable to the Project Site in the WC2035 Plan FEIR was based on the assumption that the Project Site would be redeveloped at a FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1, so that the Project has a lower development intensity than assumed in the WC2035 Plan FEIR. Therefore, the Project's impact on population growth would be consistent with the population growth contemplated under the WC2035 Plan.

For these reasons, the Project would not induce substantial population growth in an area, either directly or indirectly. Therefore, the impact would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

(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?

No Impact. The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) concluded that implementation of the WC2035 Plan was not expected to require the removal of existing housing. It further concluded that the contemplated development under the WC2035 Plan would not displace people through removal of existing housing because the construction of replacement housing to offset any loss of existing residential housing on redeveloped parcels would all be contained within the WC2035 Plan area. (WC2035 Plan DEIR, p. 4.10-11)

This analysis applies fully to the Project and the Project Site. The Project would not involve the removal of any existing housing units, because the there are no existing residential units on the Project Site. For that reason, the Project would not displace any existing residents.

Therefore, the Project would have no impact regarding the displacement of housing or people, necessitating the construction of replacement housing elsewhere, and this impact was adequately addressed in the WC2035 Plan FEIR.

14. Public Services

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 following public services?

Fire protection

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) identified that Los Angeles Fire Department (LAFD) Fire Station Nos. 72, 84, and 105 would provide fire protection services within the WC2035 Plan area. Fire Station No. 84 is located closest to the Project Site (approximately 75 feet to the south), across the street from the Project Site, at 21050 Burbank Boulevard. Fire Station No. 72 is the second closest station to the Project Site, approximately 1.2 miles to the north, located at 6811 De Soto Avenue. Fire Station 105 is the third closest station to the Project Site, approximately 2.9 miles to the northwest, located at 6345 Fallbrook Avenue. The WC2035 Plan FEIR stated that Fire Station No. 84 has an average response time of 5.6 minutes, Fire Station No. 72 has an average response time of 5.1 minutes, and Fire Station No. 105 has an average response time of 5.7 minutes. In an emergency, third and fourth response fire protection and emergency services would be provided, as needed, by other LAFD fire stations in the surrounding area. (WC2035 Plan DEIR, pp. 4-11-1-3, Table 4.11-1)

Construction

The WC2035 Plan FEIR discussed that construction activities in the WC2035 Plan area (which includes the Project Site) could temporarily increase the existing demand on fire protection and emergency medical services and potentially expose combustible materials (e.g., wood plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions in combustible materials and coatings and lighted cigarettes. However, the WC2035 Plan FEIR concluded that the Project's construction impact on fire protection and emergency medical services would be less than significant because (1) fire suppression equipment would be maintained on construction sites and (2) compliance would be required with applicable regulations and requirements, including Cal-OSHA requirements and requirements and policies relating to fire safety practices. It also found that short-term construction activities such as lane closures, sidewalk closures, and utility line construction could have implications on emergency response time, but that such impacts would be reduced to a less than significant level through the required construction staging and traffic management plan consistent with LAFD requirements. (WC2035 Plan DEIR, p. 4.11-8)

Operation

The WC2035 Plan FEIR concluded that the WC2035 Plan's anticipated 45,000 new residents and 49,000 new employees could reduce the firefighter to population ratio. However, this change would occur over an extended period of time (27 years), and with increased development and population (and increased general fund revenue), the City would maintain service levels through the addition of staff and facilities. As such, the WC2035 Plan FEIR determined that the WC2035 Plan's impact on fire protection services and emergency medical services would be less than significant. (WC2035 Plan DEIR, pp. 4.11-8-9)

The WC2035 Plan FEIR also noted that all buildings constructed within the WC2035 Plan area (which includes the Project Site) would require sprinkler systems connecting to water supply systems that meet fire flow requirements. It therefore concluded that the WC2035 Plan's impact on fire flow would be less than significant. (WC2035 Plan DEIR, p. 4.11-9)

The WC2035 Plan FEIR also discussed that the higher density, mixed-use buildings in a mid- to high-rise configuration encouraged by the WC2035 Plan would increase the amount of time firefighters spend on each call. With the additional time the LAFD could spend on calls due to the nature (configuration) of individual projects in the WC2035 Plan area, and if a reduction in the firefighter to resident ratio were to occur, the LAFD could experience a reduction in its ability to maintain the same workload/service level if they were not supplemented with additional fire fighters and equipment. (WC2035 Plan DEIR, p. 4.11-9)

The WC2035 Plan FEIR determined that, overall, the WC2035 Plan's impact related to LAFD's capability to provide adequate fire protection and emergency medical services would be less than significant, subject to compliance with the recommended mitigation measures because (1) the WC2035 Plan area is in close proximity to three fire stations that maintain adequate response times and (2) individual development projects would be subject to plan review and approval either prior

to recordation of a final map or the approval of a building permit to ensure that LAFD has reviewed site plans for access prior to construction. (WC2035 Plan DEIR, p. 4.11-9)

Finally, the WC2035 Plan FEIR concluded that, after mitigation, traffic generated by the WC2035 Plan would not significantly impact the intersections that are within the response routes of the LAFD fire stations that serve the WC2035 Plan area (which includes the Project Site), and therefore any impacts to LAFD response times were anticipated to be less than significant. (WC2035 Plan DEIR, p. 4.11-9)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended the following mitigation measures, designated as WC-PS-1 through WC-PS-11, with respect to potentially significant impacts or less than significant impacts related to fire protection and emergency medical services (WC2035 Plan FEIR, pp. V-23-26). The following mitigation measures are potentially applicable to the Project:

WC-PS-1: The City shall ensure that adequate fire protection service levels are maintained through the addition of personnel and facilities as necessary to meet anticipated demand, and where appropriate, through project-specific on-site features that reduce the demand for such personnel and facilities.

WC-PS-2: The City shall require that applicants of the individual projects developed as part of the WCRCCSP *[sic]* shall submit for review and approval all future project plans to the LAFD to ensure that all new structures would comply with current fire codes and LAFD requirements.

WC-PS-3: Project building plans shall include the submittal of a plot plan for approval by the Los Angeles Fire Department either prior to the recordation of the final map or the approval of a building permit.

WC-PS-4: The City shall require that all applicants within the WCRCCSP *[sic]* area consult with the Fire Department and incorporate fire prevention and suppression features appropriate to the design of each project.

WC-PS-5: The City shall require that plans and specifications shall be submitted to the Fire Department and requirements for necessary permits satisfied prior to commencement of any portion of any project.

WC-PS-6: The City shall require fire hydrants to be installed as appropriate that shall be fully operational and accepted by the Fire Department prior to any building construction above grade.

WC-PS-7: The City shall require plot plans indicating access driveways and roads and turning areas be reviewed and approved by the Fire Department, prior to the issuance of a building permit.

WC-PS-8: The City shall require that during the construction phase of each project, emergency access shall remain clear and unobstructed.

WC-PS-9: The City shall require that each project comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.

WC-PS-10: The City shall require that all access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

WC-PS-11: The City shall require a Fire Flow analysis to be prepared for all projects within the WCRCCSP *[sic]*. The purpose of the analysis will be to determine whether the proposed public water system could deliver required fire flows to the public fire hydrants located in the area. Should fire flow be found to be inadequate each applicant shall be required to comply with the requirements of LADWP (including construction of additional water supply lines within the proposed project area, payment of a fee to cover fair share costs and/or other measures as deemed necessary by LADWP and/or LAFD) to ensure adequate fire flow.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts on fire protection services, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below. Public service provider responses are provided in Appendix J to this Tiered IS.[108]

Less Than Significant Impact with Mitigation Incorporated.

Construction

The WC2035 Plan FEIR discussed that construction activities in the WC2035 Plan area (which includes the Project Site) could temporarily increase the existing demand on fire protection and emergency medical services and potentially expose combustible materials (e.g., wood plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions in combustible materials and coatings and lighted cigarettes. However, the WC2035 Plan FEIR concluded that the Project's construction impact on fire protection and emergency medical services would be less than significant because (1) fire suppression equipment would be maintained on construction sites and (2) compliance would be required with applicable regulations and requirements, including Cal-OSHA requirements and requirements and policies relating to fire safety practices. It also found that short-term construction

[108] Subsequent to the issuance of the service request letter, the Project was refined by the Applicant. As originally proposed, the Project included 1,029 residential dwelling units. The proposed residential component of Building 3 has been reduced by 20 units (from 254 to 234 units), resulting in a lower total residential unit count of 1,009. Because the public service letter assumed the slightly larger Project as originally proposed, the public service provider response is considered to be conservative. Therefore, the public service letter fully applies to the refined Project.

activities such as lane closures, sidewalk closures, and utility line construction could have implications on emergency response time, but that such impacts would be reduced to a less than significant level through the required construction staging and traffic management plan consistent with LAFD requirements. (WC2035 Plan DEIR, p. 4.11-8)

This analysis applies with equal force to the Project. The developer of the Project would be required to comply with all of the regulations and requirements stated in the preceding paragraph. Therefore, the Project's construction impact on fire protection and emergency medical services would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR. In order to further reduce this less than significant impact, the Project would comply with the recommended mitigation measures in the WC2035 Plan FEIR that are related to construction activities, in particular WC-PS-8.

Operation

The WC2035 Plan FEIR concluded that the WC2035 Plan's anticipated 45,000 new residents and 49,000 new employees could reduce the firefighter to population ratio. However, this change would occur over an extended period of time (27 years), and with increased development and population (and increased general fund revenue), the City would maintain service levels through the addition of staff and facilities. As such, the WC2035 Plan FEIR determined that the WC2035 Plan's impact on fire protection services and emergency medical services would be less than significant. (WC2035 Plan DEIR, pp. 4.11-8-9)

The WC2035 Plan FEIR also noted that all buildings constructed within the WC2035 Plan area (which includes the Project Site) would require sprinkler systems connecting to water supply systems that meet fire flow requirements. It therefore concluded that the WC2035 Plan's impact on fire flow would be less than significant. (WC2035 Plan DEIR, p. 4.11-9)

The WC2035 Plan FEIR also discussed that the higher density, mixed-use buildings in a mid- to high-rise configuration encouraged by the WC2035 Plan would increase the amount of time firefighters spend on each call. With the additional time the LAFD could spend on calls due to the nature (configuration) of individual projects in the WC2035 Plan area, and if a reduction in the firefighter to resident ratio were to occur, the LAFD could experience a reduction in its ability to maintain the same workload/service level if they were not supplemented with additional fire fighters and equipment. (WC2035 Plan DEIR, p. 4.11-9)

The WC2035 Plan FEIR determined that, overall, the WC2035 Plan's impact related to LAFD's capability to provide adequate fire protection and emergency medical services would be less than significant, subject to compliance with the recommended mitigation measures because (1) the WC2035 Plan area is in close proximity to three fire stations that maintain adequate response times and (2) individual development projects would be subject to plan review and approval either prior to recordation of a final map or the approval of a building permit to ensure that LAFD has reviewed site plans for access prior to construction. (WC2035 Plan DEIR, p. 4.11-9)

Finally, the WC2035 Plan FEIR concluded that, after mitigation, traffic generated by the WC2035 Plan would not significantly impact the intersections that are within the response routes of the LAFD fire stations that serve the WC2035 Plan area (which includes the Project Site), and therefore any impacts to LAFD response times were anticipated to be less than significant. (WC2035 Plan DEIR, p. 4.11-9)

This analysis adequately addresses the Project's operational impact on fire protection and emergency medical services. The Project would include the installation of sprinkler systems connecting to water supply systems that meet fire flow requirements. Therefore, the Project's impact on fire flow would be less than significant.

In addition, Psomas, the Applicant's civil engineer, met with Inspector Dallas of the Los Angeles Fire Department, Hydrants and Access Section, to discuss the hydrant coverage for the Project. There are multiple existing fire hydrants that surround the Project Site, including four along Burbank Boulevard, two along De Soto Avenue and two along Warner Center Lane. Upon review of the existing water services, Inspector Dallas concluded that the current hydrant locations and coverage are adequate, and no additional public or private fire hydrants would be necessary for the Project. (Wastewater/Water Supply Report, p. 7)

Service Advisory Requests (SARs) for Burbank Boulevard, De Soto Avenue and Warner Center Lane were provided to LADWP to determine water pressure and flow capacity for the existing water lines. The water pressures range between 87-46 pounds per square inch (PSI), depending on the street. The Fire Service Pressure Flow Reports prepared by LADWP in response to the SARs confirmed that the pressure is generally low for a development of this size. Therefore, the Project includes the installation of pumps in order to provide adequate fire flow pressure within each of the New Buildings. Each New Building would include domestic and fire water service that would be connected to existing infrastructure in Warner Center Lane. Fire water service connections would be made from the 12-inch main lines in Warner Center Lane, Burbank Boulevard and De Soto Avenue. With the inclusion of this fire flow infrastructure, the Project's impact on fire flow demand would be less than significant. (Wastewater/Water Supply Report, pp. 6-8)

In addition, consistent with the WC2035 Plan FEIR analysis, the Project's impact related to LAFD's capability to provide adequate fire protection and emergency medical services would be less than significant, subject to compliance with the recommended mitigation measures, because (1) the Project Site is located in close proximity to three fire stations, so that adequate response times would be maintained, and (2) LAFD would review and approve the plans for each phase of the Project prior to recordation of applicable final map or the approval of the applicable building permit.

The three proximate fire stations are Fire Stations 84, 72 and 105. Fire Station 84, a newer regional fire station, is located immediately to the south and across the street from the Project Site. Fire Station No. 84, which contains an engine company, is located less than the LAFD response distance criteria of one mile for an engine company. Additional back-up response would be provided by Fire Station No. 72. Fire Station No. 72, which contains truck companies, are within the LAFD response distance criteria of 1.5 miles for a truck company.

In compliance with recommended mitigation measures, for each phase of the Project, the Applicant would submit project plans to the LAFD for review and approval, incorporate fire prevention and suppression features, retain emergency access during construction, and prepare a fire flow analysis for approval by LADWP to ensure adequate fire flow. The implementation of these mitigation measures, together with compliance with applicable regulations would reduce potential impacts to staffing, equipment levels, and response times to a less than significant level.

The Project also includes design features to reduce any increase in demand on fire protection services. The Project would incorporate applicable requirements set forth in Division 118 of the Fire Code, depending on the height of each building, including a fire control station containing a public address system and telephones for LAFD use, the provision of at least one emergency and fire control elevator in each bank of elevators, fire alarm throughout each building, an emergency smoke control system, a standby and emergency power system, automatic sprinkler systems, and an emergency helicopter landing facility as required. New construction would also be subject to other requirements of the Fire Code, Building Code, and LAFD that address structural design, building materials, alarms, and smoke detectors. (WC2035 Plan DEIR, pp. 4.11-5-7)

The WC2035 Plan FEIR concluded that, with the implementation of the recommended traffic mitigation measures (which have been incorporated into the WC2035 Plan) traffic generated by buildout under the WC2035 Plan would not significantly impact the intersections that are within the response routes of the LAFD fire stations that serve the WC2035 Plan area. Given that the WC2035 Plan area includes the Project Site, the Project would therefore not significantly impact the intersections that are within the response routes of the LAFD fire stations that serve the Project Site, which further demonstrates that the Project's impact on LAFD response times would be less than significant.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan EIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at a FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact on LAFD response times.

For these reasons, with the implementation of Mitigation Measures WC-PS-1 through WC-PS-11, the Project would not 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 with respect to fire protection and emergency medical services. Therefore, the Project would have a less than significant impact on fire protection and emergency medical services, and this impact was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following mitigation measures from the WC2035 Plan FEIR are recommended with respect the Project's potentially significant impact on fire protection and

emergency medical services (these mitigation measures have been non-substantively modified to apply specifically to the Project):

PS-1: Adequate fire protection service levels shall be maintained through the addition of personnel and facilities as necessary to meet anticipated demand, and where appropriate, through project-specific on-site features that reduce the demand for such personnel and facilities.

PS-2: The Applicant shall submit for review and approval all project plans on a phase-by-phase basis to the LAFD to ensure that the applicable new building complies with current fire codes and LAFD requirements.

PS-3: The project building plans shall include the submittal of a plot plan on a phase-by-phase basis for approval by the LAFD prior to the recordation of the final map or the issuance of the first building permit for the applicable phase of the Project.

PS-4: The Applicant shall consult with the LAFD and incorporate fire prevention and suppression features appropriate to the design of each phase of the Project.

PS-5: Plans and specifications shall be submitted to the LAFD on a phase-by-phase basis and requirements for necessary permits satisfied prior to commencement of any portion of the applicable phase of the Project.

PS-6: Fire hydrants shall be installed on a phase-by-phase basis as appropriate that shall be fully operational and accepted by the LAFD prior to any building construction above grade.

PS-7: Plot plans shall indicate access driveways and roads and turning areas be reviewed and approved by the LAFD, prior to the issuance of a building permit for the applicable phase of the Project.

PS-8: During each construction phase of the Project, emergency access shall remain clear and unobstructed.

PS-9: The Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.

PS-10: All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

PS-11: A Fire Flow analysis shall be prepared for each phase of the Project. The purpose of the analysis will be to determine whether the proposed public water system can deliver required fire flows to the public fire hydrants

located in the area. Should fire flow be found to be inadequate with respect a project phase, the Applicant shall be required to comply with the requirements of LADWP (including construction of additional water supply lines within the project area, payment of a fee to cover fair share costs and/or other measures as deemed necessary by LADWP and/or LAFD) to ensure adequate fire flow.

Police protection

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) identified that the WC2035 Plan area is located within the Los Angeles Police Department's (LAPD) Valley Bureau and, more specifically, that the Topanga Community Police Station would provide police protection services within the WC2035 Plan area. The Topanga Community Police Station, which opened in January 2009, is located at 21501 Schoenborn Street in Canoga Park, approximately 3.8 miles northwest of the Project Site. The Topanga Community Police Station has 290 patrol officers, detectives and support staff. (WC2035 Plan DEIR, p. 4.11-11)

Construction

The WC2035 Plan FEIR discussed that construction-related traffic in the WC2035 Plan area could potentially affect emergency access as well as increase travel time within the WC2035 Plan area. The WC2035 FEIR attributed such traffic impacts to temporary lane closures for utility construction and flagging or stopping of traffic to accommodate trucks entering and existing construction sites. The WC2035 Plan FEIR concluded that construction-related emergency access impacts on police protection services would be less than significant because the development and implementation of a construction traffic management plan would be required for each individual development project, subject to LADOT approval. The construction traffic management plan would identify potential interim construction impacts and appropriate mitigation measures, which may include traffic management personnel (flag persons) trained to assist in emergency response and/or the use of appropriate detour signage to ensure emergency access and traffic flow is maintained. Consistent with this requirement, Mitigation Measure WC-PS-13 requires project applicants to provide adequate through access and emergency access to adjacent uses as necessary. (WC2035 Plan DEIR, pp. 4.11-13-15)

The WC2035 Plan FEIR also discussed that the temporary storage of equipment and building materials onsite could result in theft, and thus require police involvement. The WC2035 Plan FEIR concluded that this construction-related impact on police protection services would be reduced to a less than significant level with the implementation of adequate safety and security measures to secure the site, as set forth in recommended Mitigation Measures WC-PS-12 and WC-PS-14. (WC2035 Plan DEIR, pp. 4.11-14-15)

Operation

The WC2035 Plan FEIR stated that the WC2035 Plan's estimated 45,000 new residents and 49,000 new employees would increase the demand for police protection services and likely increase the

number of crimes in the WC2035 Plan area. Without the addition of staff and facilities, implementation of the WC2035 Plan would significantly reduce the officer-to-population service ratio of 22 sworn officers per 1,000 residents. However, the increase in population would be incremental and occur over an extended period of time (27 years) and the City would maintain LAPD response times through the addition of new officers as individual projects are built. The WC2035 Plan FEIR determined that the increase in population could result in significant impacts related to police protection services without the implementation of Mitigation Measures WC-PS-15 through WC-PS-19. The WC2035 Plan FEIR concluded that implementation of Mitigation Measures WC-PS-15 through WC-PS-19 would reduce operational impacts on police protection services to a less than significant level. (WC2035 Plan DEIR, pp. 4.11-14-15)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended the following mitigation measures, designated as WC-PS-12 through WC-PS-19, with respect to potentially significant impacts on police protection identified in the WC2035 Plan FEIR (WC2035 Plan FEIR, pp. V-24-25) that are potentially applicable to the Project:

Construction

WC-PS-12: The City shall require that during construction of individual projects, each project applicant shall implement security measures including security fencing, lighting, locked entry, and security patrol on the site.

WC-PS-13: The City shall require that during the construction phase of each project, each applicant shall provide adequate through access and emergency access to adjacent uses as necessary.

WC-PS-14: The City shall require that each applicant consult with the Police Department and comply with recommended security features for each construction site, including security fencing, locked entrances, lighting, and the use of a seven-day, 24-hour security patrol.

Operation

WC-PS-15: The City shall ensure that adequate police protection levels are maintained in Warner Center through provision of personnel and facilities, and, where appropriate, through project-specific on-site features that reduce the demand for such personnel and facilities.

WC-PS-16: The City shall require that applicants consult with the LAPD Crime Prevention Unit regarding crime prevention features appropriate for the design of the project and subsequently, shall submit plot plans for review and comment. The plans shall incorporate design guidelines relative to security sand *[sic]* semi-public and private spaces which may include but not be limited to access control to buildings, secured parking facilities, wall/fences with key systems, well-illuminated public and semi-public and private spaces, which may include access control to buildings, secured parking facilities, walls/fences with key systems, well –illuminated public

space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provisions of security guard patrol if needed. These measures shall be approved by the LAPD prior to the issuance of building permits.

WC-PS-17: The City shall require that upon completion of each project, each applicant shall provide the local Commanding Officer with access routes and other information that might facilitate police response, as requested by the LAPD.

WC-PS-18: The City shall require that each applicant provide project plans to the LAPD Crime Prevention Unit to determine any additional crime prevention and security features appropriate to the design of the project. Any additional design features identified by the LAPD Crime Prevention Unit shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.

WC-PS-19: The City shall require that each project incorporate design guidelines relative to security, semi-public and private spaces, which may include, but not be limited to, access control to buildings, secured parking facilities, walls/fences with key systems, well illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas and provision of security guard patrol throughout the project site if needed.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts on police protection services, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.[109]

Less Than Significant Impact with Mitigation Incorporated.

Construction

The WC2035 Plan FEIR discussed that construction-related traffic in the WC2035 Plan area (which includes the Project Site) could potentially affect emergency access and increase travel time within the WC2035 Plan area. However, the WC2035 Plan FEIR concluded that construction-related emergency access impacts on police protection services would be less than significant because the development and implementation of construction traffic management plan would be required for each individual development project, subject to LADOT approval. The construction traffic

[109] Subsequent to the issuance of the service request letter, the Project was refined by the Applicant. As originally proposed, the Project included 1,029 residential dwelling units. The proposed residential component of Building 3 has been reduced by 20 units (from 254 to 234 units), resulting in a lower total residential unit count of 1,009. Because the public service letter assumed the slightly larger Project as originally proposed, the public service provider response is considered to be conservative. Therefore, the public service letter fully applies to the refined Project.

management plan would identify potential interim construction impacts and appropriate mitigation measures, which could include traffic management personnel (flag persons) trained to assist in emergency response and/or the use of appropriate detour signage to ensure emergency access and traffic flow is maintained. Consistent with this requirement, Mitigation Measure WC-PS-13 requires project applicants to provide adequate through access and emergency access to adjacent uses as necessary. (WC2035 Plan DEIR, p. 4.11-13)

The WC2035 Plan FEIR also discussed that the temporary storage of equipment and building materials onsite could result in theft, and thus require police involvement. The WC2035 Plan FEIR concluded that this construction-related impact on police protection would be reduced to a less than significant level with the implementation of mitigation to secure the construction site, as set forth in recommended Mitigation Measures WC-PS-12 and WC-PS-14. (WC2035 Plan DEIR, pp. 4.11-14-15)

This analysis applies with equal force to the proposed Project. The Applicant would be required to implement a construction traffic management plan for the Project, which would ensure the Project's emergency access impacts would be less than significant. The construction traffic management plan would identify potential interim construction impacts and appropriate mitigation measures such as the use of traffic management personnel (flag persons) trained to assist in emergency response and/or the use of appropriate detour signage to ensure emergency access and traffic flow is maintained. Therefore, the Project's impact on construction-related emergency access impacts related to police protection would be less than significant with the implementation of recommended Mitigation Measure WC-PS-13, and this impact was adequately addressed in the WC2035 Plan FEIR.

In addition, the Project would implement the security features identified in Mitigation Measures WC-PS-12 and WC-PS-14 in the WC2035 Plan FEIR to ensure the construction site is secure to deter theft of equipment and building materials temporarily stored onsite. Therefore, the Project's construction-related impacts on police protection services would be less than significant with the implementation of recommended Mitigation Measures WC-PS-12 and WC-PS-14, and this impact was adequately addressed in the WC2035 Plan FEIR.

Operation

The WC2035 Plan FEIR stated that the WC2035 Plan's estimated 45,000 new residents and 49,000 new employees would increase the demand for police protection services and likely increase the number of crimes in the WC2035 Plan area (which includes the Project Site). Without the addition of staff and facilities, implementation of the WC2035 Plan would significantly reduce the officer-to-population service ratio of 22 sworn officers per 1,000 residents. However, the WC2035 Plan FEIR determined that the impacts related to police protection services would be less than significant with the implementation of mitigation because the change in population would be incremental and over an extended period of time and the City would maintain acceptable response times through the addition of new officers as individual projects within the WC2035 Plan area are constructed. The recommended mitigation measures require that individual projects consult with the LAPD Crime Prevention Unit prior to construction regarding crime prevention features appropriate for the

design of the project. The WC2035 Plan FEIR concluded that implementation of Mitigation Measures WC-PS-15 through WC-PS-19 would reduce operational impacts to a less than significant level. (WC2035 Plan DEIR, pp. 4.11-13-15)

This analysis also applies fully to the Project. The WC2035 Plan FEIR indicated that a reduction in the officer-to-population service ratio would occur absent the addition of new sworn officers for the WC2035 Plan area (which includes the Project Site). However, consistent with Mitigation Measure WC-PS-16, the City must ensure that adequate police protection levels are maintained in Warner Center through provision of personnel and facilities. Moreover, while the Project would result in an incremental contribution to this reduction in officer-to-population service due to the generation of new residents and employees associated with the Project Site, correspondence from LAPD reflects that the Project would have a minor impact on police services in the Topanga area (LAPD, Captain Al Neil, 2017).

In addition, as discussed in the WC2035 Plan FEIR, the development of the Project, would generate revenue for the City's general fund that would be used to fund LAPD expenditures to hire new officers for the WC2035 Plan area. Depending on the current demand for police protection services within the Topanga Community Police Station service area, the City would have the discretion to use such funds for increased patrolling in the project vicinity. (WC2035 Plan DEIR, p. 4.11-14)

To mitigate any increase in demand on police protection services associated with the Project, the City would ensure that adequate police protection levels are maintained in Warner Center through provision of personnel and facilities pursuant to Mitigation Measure WC-PS-15, and the Project would be subject to Mitigation Measures WC-PS-16 through WC-PS-19, which require, among other things, the use of crime prevention and security features such as gated entryways and well-lit public spaces and the Applicant's submission of a plot plan to the LAPD for review and approval. Any additional design features identified by the LAPD would be incorporated into the Project's final design to the satisfaction of LAPD, prior to issuance of a certificate of occupancy for the applicable New Buildings, and may include, but are not limited to, access control to buildings, secured parking facilities, wall/fences with key systems, and well-illuminated public and semi-public and private spaces. (WC2035 Plan FEIR, pp. V-24-25)

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at a FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact on police protection services.

The WC2035 Plan FEIR concluded that, with implementation of Mitigation Measures WC-PS-15 through WC-PS-19, operational impacts from the anticipated development in the WC2035 Plan area (which includes the Project Site) on police protection services would be less than significant. Therefore, with the implementation of Mitigation Measures PS-12 to PS-19, the Project's impacts on police protection services would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following mitigation measures from the WC2035 Plan FEIR are recommended with respect the Project's potentially significant impact on police protection services (these mitigation measures have been non-substantively modified to apply specifically to the Project):

Construction

PS-12: During construction, the Applicant shall implement security measures including security fencing, lighting, locked entry, and security patrol on the site.

PS-13: During the construction phase of the Project, the Applicant shall provide adequate through access and emergency access to adjacent uses as necessary.

PS-14: The Applicant shall consult with the LAPD and comply with recommended security features for the construction site, including security fencing, locked entrances, lighting, and the use of a seven-day, 24-hour security patrol.

Operation

PS-16: The Applicant shall consult with the LAPD Crime Prevention Unit regarding crime prevention features appropriate for the design of the Project and subsequently, shall submit plot plans on a phase-by-phase basis to the LAPD Crime Prevention Unit for review and comment. The plans shall incorporate design guidelines relative to security and semi-public and private spaces which may include but not be limited to access control to buildings, secured parking facilities, wall/fences with key systems, well-illuminated public and semi-public and private spaces, which may include access control to buildings, secured parking facilities, walls/fences with key systems, well-illuminated public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provisions of security guard patrol if needed. These measures shall be approved by the LAPD prior to the issuance of a building permit for the applicable phase of the Project.

PS-17: Upon completion of each phase of the Project, the Applicant shall provide the local Commanding Officer with access routes and other information with respect such phase that might facilitate police response, as requested by the LAPD.

PS-18: The Applicant shall provide project plans on a phase-by-phase basis to the LAPD Crime Prevention Unit to determine any additional crime prevention and security features appropriate to the design of the applicable phase of the Project. Any additional design features identified by the LAPD Crime Prevention Unit shall be incorporated into the final design

for the applicable phase of the Project and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for such phase of the Project.

PS-19: Each phase of the Project shall incorporate design guidelines relative to security, semi-public and private spaces, which may include, but not be limited to, access control to buildings, secured parking facilities, walls/fences with key systems, well illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas and provision of security guard patrol throughout the portion of the Project Site on which the applicable phase is located, if needed.

Schools

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) identified that Hamlin Elementary School, Woodland Hills Academy (previously known as Francis Parkman Middle School), and Canoga Park Senior High School would serve the WC2035 Plan area. Hamlin Elementary School is located at 22627 Hamlin Street, approximately 1.8 miles northwest of the Project Site, and offers instruction for Grades K–5. Woodland Hills Academy, a college-prep middle school, is located at 20800 Burbank Boulevard, approximately 600 feet south of the Project Site, and offers instruction for Grades 6–8. Canoga Park Senior High School is located at 6850 Topanga Canyon Boulevard, approximately 1.4 miles northwest of the Project Site, and offers instruction for Grades 9–12. All three schools currently operate under a single-track calendar in which instruction generally begins in early September and continues through late June. The WC2035 Plan FEIR identified all three schools as having excess student capacity based on the actual enrollment data. (WC2035 Plan DEIR, pp. 4.11-17-19)

The WC2035 Plan FEIR identified additional schools in the vicinity of the WC2035 Plan area, including LAUSD's Hart Elementary School (located immediately north of the Los Angeles River at Variel Avenue) and a number of private schools. In addition to K–12 schools in the area, Pierce Community College (Los Angeles Community College District) and the West Valley Occupational Center provide continuing education in the WC2035 Plan area. (WC2035 Plan DEIR, p. 4.11-19)

Construction

The WC2035 Plan FEIR recognized that construction haul routes would most likely require trucks to head north on Topanga Canyon Boulevard and De Soto Avenue from the Ventura Freeway. For that reason, it stated that construction-related truck traffic could occur in proximity to Canoga Park High School and Woodland Hills Academy. In addition, construction-related truck traffic could interfere with the designated pedestrian routes for all LAUSD schools that are in proximity to the WC2035 Plan area. It also found that construction staging and construction-related parking would primarily be confined to individual project sites and would not significantly interfere with school traffic.

The WC2035 Plan FEIR concluded that construction-related impacts on school bus routes and pedestrian routes would be less than significant because the development and implementation of a construction traffic management plan would be required for each individual development project, subject to LADOT approval. Each construction traffic management plan would identify potential interim construction impacts and appropriate mitigation measures to reduce impacts to a less than significant level. (WC2035 Plan DEIR, p. 4.11-22)

Operation

The WC2035 Plan FEIR stated that the WC2035 Plan would generate approximately 5,668 new elementary school students, 3,088 new middle school students, and 4,279 new high school students, for a total of 13,035 students. Therefore, it found that the implementation of the WC2035 Plan could potentially generate students substantially in excess of the current capacities of local schools. The WC2035 Plan FEIR identified other options that would allow some students to attend schools outside the WC2035 Plan area, which would reduce enrollment within the WC2035 Plan area, including LAUSD Open Enrollment options, charter schools, and private schools. However, it acknowledged that schools in the vicinity of the WC2035 Plan area were operating at or near capacity, and therefore would not be able to accommodate the volume of students generated by the implementation of the WC2035 Plan. (WC2035 Plan DEIR, pp. 4.11-22-24) There is the potential for additional LAUSD school facilities and private school construction in the WC2035 Plan area through the WC2035 Plan buildout. (WC2035 Plan DEIR, pp. 4.11-24)

The WC2035 Plan FEIR concluded that, with the payment of LAUSD developer impact fees with respect to each individual development project, the WC2035 Plan's impact on schools would be less than significant. Consistent with this determination, Mitigation Measure WC-PS-20 required project applicants to pay the prevailing State Department of Education Development Fee to the extent allowed by State law to the LAUSD prior to the issuance of a building permit. School fees exacted for residential and commercial projects would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment within the LAUSD service area, and would allow the LAUSD to allocate those funds as deemed necessary. (WC2035 Plan DEIR, pp. 4.11-24-25)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended the following mitigation measure, designated below as WC-PS-20, with respect to the WC2035 Plan's potentially significant operational impact on schools identified in the WC 2035 Plan FEIR (WC2035 Plan FEIR, pp. V-25-26) that is potentially applicable to the Project:

WC-PS-20: For projects developed under the WCRCCSP *[sic]*, the City shall ensure that prior to issuance of a building permit, the project developer shall pay to the LAUSD the prevailing State Department of Education Development Fee to the extent allowed by State law. School fees exacted from residential and commercial uses would help fund necessary school service and facilities improvements to accommodate anticipated population and

school enrollment within the LAUSD service area, and would allow for the LAUSD to allocate these funds as they deem necessary.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impact on schools, and the applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.[110]

Less Than Significant Impact with Mitigation Incorporated.

Construction

The WC2035 Plan FEIR discussed that construction-related truck traffic in the WC2035 Plan area (which includes the Project Site) would pass Canoga Park High School and Woodland Hills Academy and could potentially interfere with designated pedestrian routes for all LAUSD schools that are in proximity to the WC2035 Plan area. However, the WC2035 Plan FEIR concluded that construction-related traffic impacts on school bus routes and pedestrian routes would be less than significant because the development and implementation of construction traffic management plan would be required for each individual development project, subject to LADOT approval. Each construction traffic management plan would identify potential interim construction impacts and appropriate mitigation measures. The WC2035 Plan FEIR also noted that construction staging and construction-related parking would primarily be confined to individual project sites and would not be expected to significantly interfere with school traffic. (WC2035 Plan DEIR, p. 4.11-22)

This analysis applies with equal force to the proposed Project. The Applicant would be required to prepare, obtain LADOT approval for and implement a construction traffic management plan for the Project, which would ensure that the Project's impacts on school bus routes and pedestrian routes would be less than significant. The construction traffic management plan would identify interim construction impacts (including any potential impact on schools) and appropriate mitigation measures as needed to reduce the impact to a less than significant level. In addition, consistent with the analysis in the WC2035 Plan FEIR, construction staging and construction-related parking would primarily be confined to the Project Site and would not be expected to materially interfere with school traffic. Therefore, the Project's construction-related impacts would be less than significant with the implementation of the construction traffic management plan, and this impact was adequately addressed in the WC2035 Plan FEIR.

Operation

The WC2035 Plan FEIR stated that the WC2035 Plan (which includes the Project Site) would generate approximately 5,668 new elementary school students, 3,088 new middle school students, and 4,279 new high school students, for a total of 13,035 students. Therefore, it found that the

[110] Subsequent to the issuance of the service request letter, the Project was refined by the Applicant. As originally proposed, the Project included 1,029 residential dwelling units. The proposed residential component of Building 3 has been reduced by 20 units (from 254 to 234 units), resulting in a lower total residential unit count of 1,009. Because the public service letter assumed the slightly larger Project as originally proposed, the public service provider response is considered to be conservative. Therefore, the public service letter fully applies to the refined Project.

implementation of the WC2035 Plan could potentially generate students substantially in excess of the current capacities of local schools. The WC2035 Plan FEIR identified other options that would allow some students to attend schools outside the WC2035 Plan area, which would reduce enrollment within the WC2035 Plan area, including LAUSD Open Enrollment options, charter schools, and private schools. However, it acknowledged that schools in the vicinity of the WC2035 Plan area were operating at or near capacity, and therefore would not be able to accommodate the volume of students generated by the implementation of the WC2035 Plan. (WC2035 Plan DEIR, pp. 4.11-22-24)

On the other hand, the WC2035 Plan FEIR noted that the type of residential development anticipated under the WC2035 Plan (i.e., studio and one-bedroom apartments) would be aimed at young urban professionals without children (although some units would obviously be owned by or rented to families with children), so that the number of students generated by implementation of the WC2035 Plan would be lower than expected. Furthermore, there was the potential for additional LAUSD school facilities and private school construction in the WC2035 Plan area through the WC2035 Plan buildout. (WC2035 Plan DEIR, p. 4.11-24)

The WC2035 Plan FEIR concluded that, with the payment of LAUSD developer impact fees with respect to each individual development project, the WC2035 Plan's impact on schools would be less than significant. Consistent with this determination, Mitigation Measure WC-PS-20 required project applicants to pay the prevailing State Department of Education Development Fee to the extent allowed by State law to the LAUSD prior to the issuance of a building permit. School fees exacted for residential and commercial projects would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment within the LAUSD service area, and would allow for the LAUSD to allocate those funds as it deemed necessary. (WC2035 Plan DEIR, pp. 4.11-24-25)

This analysis adequately addresses the Project's operational impact on schools. The Project's proposed residential and commercial uses would increase the number of children in the WC 2035 Plan area that attend LAUSD schools. However, consistent with Mitigation Measure WC-PS-20, the Applicant would be required to pay to LAUSD the prevailing school fee for development projects on a phase-by-phase basis prior to the issuance of a building permit for the applicable phase. Those school fees would the used to fund school services and facility improvements to accommodate anticipated population and school enrollment within the LAUSD service area, and would allow the LAUSD to allocate these funds as they deem necessary.

Moreover, in accordance with Section 65996(a) of the California Government Code, the payment of such school fees constitutes the exclusive means of considering and mitigating school facilities impacts of projects, and are deemed to provide full and complete school facilities mitigation.

Furthermore, the Project's studio and one-bedroom units, which total 126 and 477 units, respectively, are designed for young urban professionals without children. These units also comprise the majority of the proposed 1,009 residential units for the Project. Therefore, consistent with the analysis in the WC2035 Plan FEIR, the Project's impact on schools would likely be less

than expected, and the school fees for the Project would therefore likely be disproportionate to the Project's school impact.

In addition to the schools discussed in the WC2035 Plan FEIR, current correspondence with LAUSD indicated that the Project Site would be served by additional LAUSD schools in the Woodland Hills community, including Calvert Street Charter for Enriched Studies Elementary School (Calvert Elementary School), located at 19850 Delano Street; Serrania Avenue Charter for Enriched Studies Elementary School, located at 5014 Serrania Avenue; and Taft Charter High School, located at 5461 Winnetka Avenue. The Project Site would also be served by Woodland Hills Academy Middle School, which was discussed in the WC2035 Plan FEIR. (LAUSD Master Planning & Demographics, Rena Perez, 2017)

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact on schools.

Relatedly, and as shown in **Table B-24,** *Estimated Number of Students Generated by the Project*, the Project would generate approximately 191 elementary school students, 60 middle school student and 111 high school students, for a total of 362 students. This is well within the number of students anticipated to be generated by development projects in the WC2035 Plan area (WC2035 Plan DEIR, pp. 4.11-22-25).

TABLE B-24
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE PROJECT

Land Use	Development (sf)	Dwelling Units	Elementary School	Middle School	High School	Total Students[c]
Proposed Uses						
Residential [a,]		1,009	166	45	95	307
Retail and Services[b]	85,545		2	1	1	4
Office[b]	1,140,746		32	16	20	68
Hotel[b]	157,535		1	1	1	3
Total Students Generated by Proposed Uses			**201**	**64**	**117**	**382**
Existing Uses						
Retail and Services[b]	20,143		0.9	0.2	0.2	1
Office[b]	320,196		9	4	6	19
Total Students Generated by Existing Uses			**10**	**4**	**6**	**20**
Net Increase (Proposed – Existing)			**191**	**60**	**111**	**362**

NOTES:

[a] Student generation rates for residential uses are based on the LAUSD 2012 School Facilities Needs Analysis, September 2012. Residential generation rates per Multi-Family residential unit are: Elementary = 0.1649; Middle School = 0.0450; High School = 0.0943.

[b] Student generation rates for commercial uses are taken from the LAUSD 2010 Commercial/Industrial Development School Fee Justification Study, September 27, 2010, which provides the most recent data available for non-residential uses. Retail generation rates per 1,000 sf are: Elementary = 0.0178; Middle School = 0.0089; High School = 0.0111. Office generation rates per 1,000 sf are: Elementary = 0.0278; Middle School = 0.0139;

High School = 0.0173. Hotel generation rates per 1,000 sf are: Elementary = 0.0090; Middle School = 0.0046; High School = 0.0057.

[c] Rounded to the nearest whole number. Numbers may not sum.

SOURCE: ESA 2018.

For these reasons, consistent with the analysis in the WC2035 Plan FEIR, with the implementation of Mitigation Measure WC-PS-20, the Project's operational impacts on schools would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measure

Based on the foregoing analysis, the following mitigation measure from the WC2035 Plan FEIR is recommended to mitigate the Project's potentially significant impact on schools (this mitigation measure has been non-substantively modified to apply specifically to the Project):

PS-20: Prior to issuance of a building permit for each phase of the Project, the Applicant shall pay to the LAUSD the prevailing State Department of Education Development Fee for the applicable phase of the Project to the extent allowed by State law. School fees exacted from residential and commercial uses would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment within the LAUSD service area, and would allow for the LAUSD to allocate these funds as they deem necessary.

Parks

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) identified one park in the WC2035 Plan area, Warner Center Park, which is located at 5800 Topanga Canyon Boulevard. Other park and recreation areas identified as serving the WC2035 Plan Area include the Winnetka Recreation Center, Lanark Park, Runnymeade Recreation Center, Shadow Ranch Park, the Woodland Hills Recreation Center, Woodland Hills Country Club, Serrania Avenue Park, Alizondo Drive Park, West Valley Park, and Reseda Park and Recreation Center. In addition to these parks, two community parks were identified as being within three miles of the WC2035 Plan area, Reseda Park and Recreation Center and Winnetka Recreation Center. The provision of parkland in the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan area was estimated to be 1.17 acres per 1,000 residents. (WC2035 Plan DEIR, pp. 4.11-25-27)

The WC2035 Plan FEIR recognized that buildout under the WC2035 Plan would include the development of a mix of residential, shopping, office and other uses. Consistent with Section 6.2.2.1 of the WC2035 Plan, each development project is required to create and maintain Publicly Accessible Open Space (PAOS) on 15 percent of the net site area. It noted that, if additional open space is required, payment of fees would provide adequate mitigation. Given the PAOS requirement in the WC2035 Plan, the WC2035 Plan FEIR determined that the WC2035 Plan would not cause or accelerate substantial physical deterioration of any offsite local or regional park or recreational facility, nor would it substantially increase the use of offsite neighborhood and regional

parks and recreational facilities. It therefore concluded that the WC2035 Plan's impact on parks would be less than significant. (WC2035 Plan DEIR, p. 4.11-30)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended the following mitigation measure, designated as WC-PS-21, with respect to the potentially significant impact on parks and recreational facilities (WC2035 Plan FEIR, p. V-25) that is potentially applicable to the Project:

> **WC-PS-21:** The City shall require that project applicants comply with the open space regulations of the WCRCCSP *[sic]* and, for projects that involve a residential subdivision, also undertake one of the following: (1) dedicate additional parkland to meet the requirements of Los Angeles Municipal Code Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in lieu fees. If any fees are collected, they should be spent within the WCRCCSP *[sic]* area, including, for example, within opportunity areas along the Los Angeles River.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts on parks, and the applicable mitigation measure identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.[111]

Less Than Significant Impact with Mitigation Incorporated. The WC2035 Plan FEIR recognized that buildout under the WC2035 Plan would include the development of a mix of residential, shopping, office and other uses. Consistent with Section 6.2.2.1 of the WC2035 Plan, each development project is required to create and maintain PAOS on 15 percent of the net site area. It noted that, if additional open space is required, payment of fees would provide adequate mitigation. Given the PAOS requirement in the WC2035 Plan, the WC2035 Plan FEIR determined that the WC2035 Plan would not cause or accelerate substantial physical deterioration of any offsite local or regional park or recreational facility, nor would it substantially increase the use of offsite neighborhood and regional parks and recreational facilities. It therefore concluded that the WC2035 Plan's impact on parks would be less than significant. (WC2035 Plan DEIR, p. 4.11-30)

This analysis adequately addresses the Project's impact on parks. As discussed in the **Attachment A,** *Project Description,* of this Tiered IS, the Project includes approximately 121,683 square feet (or approximately 2.79 acres, which is approximately 11.66 percent of the net lot area) of PAOS which is greater than the minimum PAOS required in Section 6.2.2 of the WC2035 Plan. With the inclusion of the New Street, the Project's PAOS requirement is reduced by 50 percent, from 15 percent to 7.5 percent of the net lot area. This translates to a reduction in the minimum PAOS

[111] Subsequent to the issuance of the service request letter, the Project was refined by the Applicant. As originally proposed, the Project included 1,029 residential dwelling units. The proposed residential component of Building 3 has been reduced by 20 units (from 254 to 234 units), resulting in a lower total residential unit count of 1,009. Because the public service letter assumed the slightly larger Project as originally proposed, the public service provider response is considered to be conservative. Therefore, the public service letter fully applies to the refined Project.

required from 156,345 square feet, or 3.59 acres, to approximately 78,172.6 square feet, or 1.80 acres. However, as previously discussed, the Project requires two Incentivized Uses in order to ascend the Graduated FAR Table use mix for the Commerce District. One of the Incentivized Uses provided is a minimum of 50 percent more PAOS than is required by Section 6.2.2 of the WC 2035 Plan. As a result, the PAOS required for the proposed Project increases by 50 percent, from 1.8 acres to approximately 2.69 acres. Therefore, the 2.79 acres of PAOS included in the Project exceed the required PAOS of 2.69 acres.

The PAOS excess open space areas that are part of the Project would be attractively improved and landscaped, and would connect the Project to the adjoining public streets, as well as connect buildings on the Project Site together, with the express purpose of developing urban gathering spaces to benefit the occupants, users and visitors of and to the Project. Some of the key features envisioned for these areas include, but are not limited to, the following (the features described in Items 1 through 6 are shown in Figure A-29):

1. A publicly-accessible children's play area (approximately 6,750 square feet in size) located between Buildings 2 and 3, adjacent to (north of) the Town Center public plaza.
2. A designated gathering space between Buildings 6, 8 and 9 to function as a flexible outdoor use area that may also be used for events. This space includes a grand lawn, gently sloping down to the gathering space. During the day, this space will be populated with tables, chairs and umbrellas to allow the public and office workers to enjoy the outdoor setting.
3. A Zen garden north of the flexible outdoor use area (west of Building 9).
4. Pet relief stations (approximately six) incorporated throughout the open space, which will include waste disposal bags, trash cans, water and dog friendly vegetation.
5. Public green space incorporated between Buildings 5 and 6. The north/south walk meanders with a prominent feature wall/fireplace terminating the view to the south.
6. Public green space in the Town Center public plaza between Buildings 2 and 3. The restaurant patios provide adjacencies to the plaza, while allowing more buffer and landscape between the plaza and the buildings.
7. Other amenities sprinkled throughout the areas, such as chess tables, backgammon tables, outdoor office/meeting spaces, tables, chairs, umbrellas, picnic tables, seat walls, accent lighting, shade structures and lounge seating.
8. Public art features, such as an art/sculpture garden/walk throughout areas and murals on Buildings 8 and 9.
9. As an additional community amenity, Building 4A is proposed to include an approximately 4,068-square-foot community space on the second floor. The programming for this community space would be determined in collaboration with local constituents, including the Woodland Hills-Warner Center Neighborhood Council, Council District 3 and the Warner Center Cultural Amenities Committee (or similar body).

In addition, consistent with Mitigation Measure WC-PS-21, the Applicant would also be required to dedicate additional parkland and/or pay the required in-lieu fees, and the required in-lieu fees can be offset in whole or in part by providing onsite improvements. Pursuant to Section 12.33.H.2 of the LAMC, the Applicant has requested a credit against the dedication/in-lieu fee requirement

with respect to (1) the Project's approximately 109,762 square feet (2.52 acres) of additional open space (i.e., in addition to the 2.79 acres of PAOS) for potential park and recreational facilities available to the public, (2) the Project's non-publicly accessible open space areas and (3) the physical improvements associated with those areas.

For these reasons, consistent with the analysis in the WC2035 Plan FEIR, the Project would not cause or accelerate substantial physical deterioration, or substantially increase the use of, any offsite local or regional park/recreation facilities. Therefore, with the implementation of Mitigation Measures WC-PS-21, the Project's impact on parks and recreational facilities would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measure

Based on the foregoing analysis, the following mitigation measure from the WC2035 Plan FEIR is recommended to mitigate the Project's potentially significant impact on parks and recreational facilities (this mitigation measure has been non-substantively modified to apply specifically to the Project):

PS-21: The Applicant shall comply with the open space regulations of the WC2035 Plan and also undertake one of the following: (1) dedicate additional parkland to meet the requirements of LAMC Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall; and/or (3) provide onsite improvements equivalent in value to said in lieu fees. If any fees are collected, they should be spent within the WC2035 Plan area, including, for example, within opportunity areas along the Los Angeles River.

Other public facilities (libraries)

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) identified the following three Los Angeles Public Library (LAPL) branch libraries that would service the WC2035 Plan area: (1) Woodland Hills Branch Library; (2) Canoga Park Branch Library; and (3) Platt Branch Library. The Woodland Hills Branch Library is located at 22200 Ventura Boulevard (approximately 1.6 miles to the southwest of the Project Site). Canoga Park Branch Library is located at 20939 Sherman Way (approximately 2.0 miles to the north of the Project Site). Platt Branch Library is located at 23600 Victory Boulevard (approximately 4.8 miles to the northwest of the Project Site).

To guide the construction, maintenance, and operation of libraries within the City, the LAPL Board of Commissioners adopted the 2007 Branch Facilities Plan, which has two components: (1) it establishes standards for the size and features of a local branch based on the population and location it would serve; and (2) it provides a status list of existing branches and identification of communities that do not have library services. The site criteria for library branch facilities include the following size standards:

- Branches serving a population above 45,000 people must have a facility of at least 14,500 square feet on a 40,000-square-foot property;
- Branches serving a population below 45,000 people must have a facility of at least 12,500 square feet on a property of at least 32,500 square feet;
- The size of a regional branch facility must not exceed 20,000 square feet on a 52,000-square-foot property; and
- When a community reaches a population of 90,000, an additional branch should be considered for the area.

The WC2035 Plan FEIR stated that the Woodland Hills Branch Library had a projected service population of approximately 50,281 residents in 2010. The library is approximately 12,500 square feet in size and has 11 staff positions and 55,000 volumes. While the library does not meet the LAPL size criteria set forth in its 2007 Facilities Plan, the LAPL indicated that this library met the demand for library services. (WC2035 Plan DEIR, p. 4.11-31)

The WC2035 Plan FEIR discussed that the Canoga Park Branch Library had a projected service population of approximately 79,763 residents in 2010. The library is approximately 12,500 square feet in size and has 12 staff positions and 61,006 volumes. The Canoga Park Branch Library does not meet the 2007 LAPL Facilities Plan size criteria, but the LAPL indicated that the facility met the demand for library services in the area and no new facilities were planned. (WC2035 Plan DEIR, p. 4.11-31)

The WC2035 Plan FEIR also stated that the Platt Branch Library had a projected service population of approximately 43,871 residents in 2010. The library has 14 staff positions and 65,071 volumes. Unlike the Woodland Hills Branch Library and the Canoga Park Branch Library, the Platt Branch Library is 14,053 square feet in size, which meets the 2007 LAPL Facilities Plan size criteria. The LAPL found that the demand for library services was met by the Platt Branch Library and no new facilities were planned. (WC2035 Plan DEIR, p. 4.11-31)

The WC2035 Plan FEIR concluded that the WC2035 Plan's approximately 45,000 new residents would exceed the population recommended for a 14,500 square foot library property. It stated that the three existing libraries that serve the WC2035 Plan area are each 12,500 square feet and do not meet the LAPL standard (with the exception of the Platt Branch Library, which at 14,053 square feet in size, does meet the standard). It also stated that new population generated by the WC2035 Plan would increase demand at each of the three libraries within the WC2035 Plan area. While the current facilities were operating below the LAPL size standard (although maintaining adequate service), the additional residents generated by the implementation of the WC2035 Plan would not trigger the 90,000-resident threshold for a new library branch. However, because the current facilities do not meet the LAPL size standard, the WC2035 Plan FEIR determined that it is possible that facilities could deteriorate with increased use. The WC2035 Plan FEIR concluded that the payment of appropriate fees would reduce the library impact to a less than significant level. Expanding on this statement, Mitigation Measure WC-PS-22 in the WC2035 Plan FEIR required project applicants to offset the burden on the existing libraries through one of the following: (1) payment of a fee based on an established nexus between the new individual development project,

demand and the need for additional personnel and facilities; (2) provide onsite facilities commensurate with the demand generated; or (3) some combination of (1) and (2). (WC2035 Plan DEIR, pp. 4.11-33-34, WC2035 Plan FEIR, p. V-26)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended the following mitigation measure, designated as WC-PS-22, with respect to potentially significant impacts on libraries identified in the WC2035 Plan FEIR (WC2035 Plan FEIR, p. V-26) that is potentially applicable to the Project:

> **WC-PS-22:** The City shall require that individual projects developed within the WC2035 Plan area offset the burden on the existing libraries through one of the following: (1) payment of a fee based on an established nexus between the new development, demand and the need for additional personnel and facilities; (2) provision of on-site facilities commensurate with the demand generated; or (3) some combination of the foregoing. If any fees are collected, they should be spent within the WCRCCSP *[sic]* area.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts on libraries, and the applicable mitigation measure identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

Less Than Significant Impact with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), the addition of new residents in the WC2035 Plan area (which includes the Project Site) is anticipated to increase demand at each of the three libraries that serve the WC2035 Plan area. Although two of these libraries are currently operating below the LAPL Branch Facilities Plan size standard, the additional residents generated by the implementation of the WC2035 Plan would not meet the threshold (90,000 people) for requiring a new branch library. However, because the existing library facilities in the WC2035 Plan area do not currently meet LAPL size standards, the WC2035 Plan FEIR concluded that the facilities could deteriorate with the addition of new residents. (WC2035 Plan DEIR, p. 4.11-33)

The WC2035 Plan FEIR concluded that with the payment of appropriate library impact fees and/or the provision of onsite facilities with respect each individual development project, the WC2035 Plan's impact on libraries would be less than significant. Specifically, Mitigation Measure WC-PS-22 requires project applicants to offset the burden on the existing libraries through one of the following: (1) payment of a fee based on an established nexus between the new individual development project, demand and the need for additional personnel and facilities; (2) provide onsite facilities commensurate with the demand generated; or (3) some combination of (1) and (2). (WC2035 Plan DEIR, pp. 4.11-33-34, WC2035 Plan FEIR, p. V-26)

This analysis is fully applicable to the Project. The Project's proposed residential and commercial uses would result in an increase in project residents and employees using library facilities.

However, consistent with Mitigation Measure WC-PS-22, the Applicant would be required either to pay an impact fee based on an established nexus between the proposed Project and the associated demand for additional library personnel and facilities, provide onsite facilities commensurate with the demand for library facilities generated by the Project, or some combination of an impact fee and onsite facilities.

Moreover, while the Project would result in an incremental increase in library usage due to the generation of new residents and employees, recent correspondence from LAPL is consistent with the analysis and conclusion in the WC2035 Plan FEIR. The LAPL correspondence confirmed that the 90,000-person threshold for requiring a new branch library has not been met at any of the three library facilities. In addition, consistent with Mitigation Measure WC-PS-22, LAPL recommended a mitigation fee to be paid by the Applicant to reduce impacts to libraries by providing the funding for additional staff, books, computers and other library materials. (LAPL, Thomas Jung, 2018)

The WC2035 Plan FEIR acknowledged that the shift from traditional book research to electronic research methods is changing the demand for library facilities. It stated that there is increased demand for computer resources, and therefore, an increased demand for upgraded library facilities. The LAPL maintains Virtual Library branches with multiple computer workstations, which provide the public with access to LAPL's online catalog, extensive information databases and the Internet. Virtual Library branches also provide Wi-Fi connectivity for mobile electronic devices. The three libraries that would serve the Project – Canoga Park Branch Library, West Valley Regional Branch Library, and Woodland Hills Branch Library – are all Virtual Library branches. Research and reading materials are now conveniently accessible to the general population that otherwise may have used a traditional library facility. The Project would include facilities that would serve to offset the demand for Virtual Library services at existing LAPL libraries and the need for upgraded library facilities, such as business centers, computer rooms and Wi-Fi capability that would permit project residents, commercial tenants, employees and visitors to conduct online research and access LAPL online information databases and services. (WC2035 Plan DEIR, p. 4.11-33; LAPL, Thomas Jung, 2018)

Moreover, the Project's impact on library services would be less than assumed in the WC2035 Plan FEIR because the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan EIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at a FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's impact on library facilities.

The WC2035 Plan FEIR concluded that, with implementation of Mitigation Measure WC-PS-22, the WC2035 Plan's impact on library services from the anticipated development in the WC2035 Plan area (which includes the Project Site) would be less than significant. Therefore, with the implementation of Mitigation Measure WC-PS-22, the Project's impact on library services would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measure

Based on the foregoing analysis, the following mitigation measure from the WC2035 Plan FEIR is recommended to mitigate the Project's potentially significant impact on library facilities (this mitigation measure has been non-substantively modified to apply specifically to the Project):

PS-22: The Applicant shall offset the burden on the existing libraries through one of the following: (1) payment of a fee based on an established nexus between the Project, demand and the need for additional personnel and facilities on a phase-by-phase basis; (2) provision of onsite facilities commensurate with the demand generated; or (3) some combination of the foregoing. If any fees are collected, they should be spent within the WC2035 Plan area.

15. Recreation

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) did not separately analyze the potential impact of the WC2035 Plan on recreation. Instead, the impact on recreational facilities was evaluated in its discussion of Public Services, Parks (WC2035 Plan DEIR, Section 4.11). As such, the analysis of the Project's potential impacts on recreation and recreational facilities is provided in Checklist Question 14(d) above and summarized below.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts on recreation, and the applicable mitigation measure identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact with Mitigation Incorporated. As discussed in Section 14(d) above, the WC2035 Plan FEIR recognized that buildout under the WC2035 Plan would include the development of a mix of residential, shopping, office and other uses. Consistent with Section 6.2.2.1 of the WC2035 Plan, each development project is required to create and maintain Publicly Accessible Open Space (PAOS) on 15 percent of the net site area. It noted that, if additional open space is required, payment of fees would provide adequate mitigation. Given the PAOS requirement in the WC2035 Plan, the WC2035 Plan FEIR determined that the WC2035 Plan would not cause or accelerate substantial physical deterioration of any offsite local or regional park or recreational facility, nor would it substantially increase the use of offsite neighborhood and regional parks and recreational facilities. It therefore concluded that the WC2035 Plan's impact on parks would be less than significant. (WC2035 Plan DEIR, p. 4.11-30)

This analysis is fully applicable to the Project's impact on parks and other recreational facilities. As discussed in the **Attachment A,** *Project Description*, of this Tiered IS, the Project includes approximately 2.79 acres (or 121,683 square feet) of PAOS. With the inclusion of the New Street and the requested Incentivized Use to ascend the Graduated FAR Table, the Project would be required to provide 2.69 acres of PAOS, while the Project includes 2.79 acres of PAOS.

In addition, consistent with Mitigation Measure WC-PS-21, the Applicant would also be required to dedicate additional parkland and/or pay the required in-lieu fees, and the required in-lieu fees can be offset in whole or in part by providing onsite improvements. Pursuant to Section 12.33.H.2 of the LAMC, the Applicant has requested a credit against the dedication/in-lieu fee requirement with respect to (1) the Project's approximately 109,762 square feet (2.52 acres) of additional open space (i.e., in addition to the 2.79 acres of PAOS) for potential park and recreational facilities available to the public, (2) the Project's non-publicly accessible open space areas and (3) the physical improvements associated with those areas. Some of the key features envisioned for these areas, but are not limited to, the following:

1. A publicly-accessible children's play area (approximately 6,750 square feet in area) located between Buildings 2 and 3, adjacent to (north of) the Town Center public plaza.
2. A designated gathering space between Buildings 6, 8 and 9 to function as a flexible outdoor use area that may also be used for events. This space includes a grand lawn, gently sloping down to the gathering space. During the day, this space will be populated with tables, chairs and umbrellas to allow the public and office workers to enjoy the outdoor setting.
3. A Zen garden north of the flexible outdoor use area (west of Building 9).
4. Pet relief stations (approximately six) incorporated throughout the open space, which will include waste disposal bags, trash cans, water and dog friendly vegetation.
5. Public green space incorporated between Buildings 5 and 6. The north/south walk meanders with a prominent feature wall/fireplace terminating the view to the south.
6. Public green space in the Town Center public plaza between Buildings 2 and 3. The restaurant patios provide adjacencies to the plaza, while allowing more buffer and landscape between the plaza and the buildings.
7. Other amenities sprinkled throughout the areas, such as chess tables, backgammon tables, outdoor office/meeting spaces, tables, chairs, umbrellas, picnic tables, seat walls, accent lighting, shade structures and lounge seating.
8. Public art features, such as an art/sculpture garden/walk throughout areas and murals on Buildings 8 and 9.

As an additional community amenity, Building 4A is proposed to include an approximately 4,068-square-foot community space on the second floor. The programming for this community space would be determined in collaboration with local constituents, including the Woodland Hills-Warner Center Neighborhood Council, Council District 3 and the Warner Center Cultural Amenities Committee (or similar body).

For these reasons, consistent with the analysis in the WC2035 Plan FEIR, the Project would not cause or accelerate substantial physical deterioration, or substantially increase the use of, any offsite

local or regional park/recreation facilities. Therefore, with the implementation of Mitigation Measure WC-PS-21, the Project's impact on parks and recreational facilities would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. As discussed in Section 14(d) above, the WC2035 Plan requires 2.69 acres of PAOS for the Project, and the Project includes 2.79 acres of PAOS. In addition, the Project includes approximately 109,762 square feet (2.52 acres) of additional open space (i.e., in addition to the 2.79 acres of PAOS) for potential park and recreational facilities available to the public. These project features have been incorporated into the overall project design and would be constructed in phases as part of the Project. Therefore, the tiered environmental impacts of the Project's onsite recreational areas and facilities have necessarily been evaluated throughout this Tiered IS. Moreover, the environmental impacts associated with the proposed recreational areas and facilities, which feature open space and limited improvements, are minimal in comparison to the overall Project.

Summary of Recommended Project Mitigation Measure

Based on the foregoing analysis, the following mitigation measure from the WC2035 Plan FEIR is recommended to mitigate the Project's potentially significant impact on parks and recreational facilities (this mitigation measure has been non-substantively modified to apply specifically to the Project):

PS-21: The Applicant shall comply with the open space regulations of the WC2035 Plan and also undertake one of the following: (1) dedicate additional parkland to meet the requirements of LAMC Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall on a phase-by-phase basis; and/or (3) provide onsite improvements equivalent in value to said in lieu fees on a phase-by-phase basis. If any fees are collected, they should be spent within the WC2035 Plan area, including, for example, within opportunity areas along the Los Angeles River.

16. Transportation and Circulation

Analysis in WC2035 Plan FEIR

The WC2035 Plan FEIR (which includes the WC2035 Plan DEIR) describes the WC2035 Plan area as a predominantly commercial center with some residential uses, which the WC2035 Plan seeks to transform into a regional center with mixed-use transit-oriented development. The WC2035 Plan is therefore designed to encourage increased density throughout most of the Plan area, largely through infill redevelopment (i.e., replacement of existing uses in already urbanized areas), including nearly quadrupling the current residential area and nearly doubling the existing non-residential area. In so doing, development under the WC2035 Plan would ultimately concentrate a more diverse mix of uses in close proximity to one another (i.e., walking distance)

within Warner Center, pulling in growth from outlying areas in the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan, and reducing vehicle use and vehicle miles traveled. (WC2035 Plan DEIR, pp. 4.8-22-23)

In order to analyze the traffic impacts associated with buildout under the WC2035 Plan, the WC2035 Plan area was divided into 26 Traffic Analysis Zones (TAZs). The Project Site is in part of TAZ 19. (WC2035 Plan DEIR, pp. 4.12-33-39)

Intersection and Arterial Level of Service Impacts

The WC2035 Plan FEIR determined that 87 of the 152 intersections analyzed in the WC2035 Plan area would be significantly impacted by buildout under the WC2035 Plan (WC2035 Plan DEIR, pp. 4.12-65-71). In addition, it determined that four of the 52 arterial roadway segments analyzed would be significantly impacted by buildout under the 2035 Plan (WC2035 Plan DEIR, pp. 4.12-65, 73). Physical intersection improvements, which are set forth as Mitigation Measures WC-TR-1 through WC-TR-98, as well as WC-TRS-1 (which relates to the contemplated Variel Avenue Corridor Improvements between Victory Boulevard and the L.A. River), in the WC2035 Plan FEIR (as discussed further below), were identified as feasible at all but one of the significantly impacted intersections and one of the significantly impacted arterial roadway segments (WC2035 Plan DEIR, pp. 4.12-79-91). With the implementation of the intersection mitigation package and the arterial improvements and the Variel Avenue Corridor Improvements, the WC2035 Plan would only result in a significant and unavoidable impact at one intersection (Variel Avenue/Victory Boulevard) and one arterial segment (Canoga Avenue between Ventura Boulevard and Oxnard Street) (WC2035 Plan DEIR, pp. 4.12-94-113). The WC2035 Plan FEIR also concluded that, if the Variel Avenue Corridor Improvements (well north of the Project Site) were not implemented as a system-wide mitigation measure, three additional intersections would have a significant and unavoidable impact (Canoga Avenue/Sherman Way, Owensmouth Avenue/Saticoy Street, Winnetka Avenue/Vanowen Street) (WC2035 Plan DEIR, p. 4.12-95).

Congestion Management Program (CMP) Facility Impacts

The WC2035 Plan FEIR determined that the WC2035 Plan would have a significant impact on all five of the CMP intersections located within the WC2035 Plan area without mitigation. However, with the implementation of Mitigation Measures WC-TR-1 through WC-TR-98 and WC-TRS-1, the impacts on those intersections would be reduced to a less-than-significant level.

The WC2035 Plan would not have a significant impact on freeway traffic because the number of peak hour vehicle trips projected to be generated by buildout under the WC2035 Plan would not exceed 150 trips in either travel direction along the mainline of the US-101 Ventura Freeway at Winnetka Avenue, which is nearest CMP freeway mainline monitoring station. (WC2035 Plan DEIR, pp. 4.12-73, 75)

Neighborhood Circulation Impacts

The WC2035 Plan FEIR determined that unforeseeable impacts on local residential streets could result from buildout under the WC2035 Plan, as drivers in the increasingly densely developed Plan

area sought alternate routes and cut through residential neighborhoods. A total of 41 intersections were identified as having the potential to generate cut-through traffic in adjacent residential neighborhoods. (WC2035 Plan DEIR, pp. 4.12-75-77)

The WC2035 Plan FEIR concluded that, with the implementation of the traffic mitigation improvements identified in Mitigation Measures WC-TR-1 through WC-TR-98 and WC-TRS-1, the number of intersections with an LOS of F during the AM or PM peak hour would be reduced from 41 to 15, a substantial improvement. The highest-risk neighborhoods were directly adjacent to the north and northeast boundaries of the WC2035 Plan area, also to the southwest of the Plan area. (WC2035 Plan DEIR, pp. 4.12-93-94)

The WC2035 Plan DEIR also recommended Mitigation Measure WC-TR-101, which directs the City to implement a Neighborhood Protection Program. The WC2035 Plan requires a portion of the collected mobility fees for this purpose, in particular to address and mitigate any unforeseeable neighborhood traffic impacts as they arise from buildout under the WC2035 Plan. The WC2035 Plan FEIR indicated that, with the implementation of Mitigation Measure WC-TR-101, the impact of the WC2035 Plan on neighborhood circulation would be less than significant. (WC2035 Plan DEIR, p. 4.12-93)

Temporary Traffic Impacts

The WC2035 Plan FEIR concluded that temporary (that could extend for a number of years) interim significant traffic impacts could occur if:

- Incremental implementation of mitigation measures does not precisely match specific impacts generated as development occurs;
- Mitigation measures lag behind development; or
- Construction of new development and/or construction of mitigation measures adversely affects traffic.

Parking Impacts

Based on the WC2035 Plan area's designation as a State Enterprise Zone, the WC2035 Plan defined parking requirements for implementation in the Plan area, which include minimum and maximum allowable parking ratios for residential and non-residential land uses, as well as a range of measures such as centralized public parking, a system of shared parking credits, and reduced parking requirements for large or mixed-use projects. With implementation of these requirements and measures, the WC2035 Plan's parking impact was determined to be less than significant. (WC2035 Plan DEIR, p. 4.12-77)

Accident and Emergency Access Impacts

The WC2035 Plan FEIR noted that the decrease in the rate of auto trips and increased utilization of transit and other alternative modes in the WC2035 Plan area would potentially reduce system-wide injury and fatality rates. The WC2035 Plan FEIR concluded that, in any event, with the implementation of the mitigation measures identified in WC-TR-1 through WC-TR-98 and WC-

TRS-1 have been implemented at the significantly impacted intersections and arterial street segments, the WC2035 Plan buildout was not expected to impact emergency vehicle access because only one intersection and one arterial street segment would remain significantly impacted. (WC2035 Plan DEIR, p. 4.12-78)

Mobility Fee

To fund the traffic infrastructure improvements recommended in the WC2035 Plan FEIR, a Mobility Fee Nexus Study was prepared for the WC2035 Plan as part of the WC2035 Plan FEIR (Appendix G to the WC2035 Plan DEIR) and updated and finalized in Appendix E to the WC2035 Plan. The Mobility Fee Nexus Study estimated the costs associated with the physical mitigation measures related to traffic improvements, including right-of-way acquisition, construction, and City administrative expenses, as well as the costs of other traffic and transit improvements including roadway widening for key streets, streetscape improvements, neighborhood traffic management costs (e.g., traffic calming, etc.), expansion of the bus fleet to serve the Plan area, operational costs associated with the expanded bus fleet, and Warner Center Orange Line terminus station costs. (WC2035 Plan, Appendix E, p. 2)

The total cost of the planned mobility improvements was then divided by the number of net new traffic trips anticipated as the result of WC2035 Plan buildout to determine a mobility fee per person trip. An appropriate per-job trip rate was determined for each of the four Warner Center land use categories – residential, retail, office, and institutional – based on established SCAG model inputs, which was then converted to person trip rates (i.e., employees) per thousand square feet for all but the residential uses, which yielded a final person trip rate for each land use category. As is typical, institutional and residential uses resulted in the lowest trip generation (0.80 trips per 1,000 square feet and 0.89 trips per dwelling unit, respectively) and retail uses resulted in the highest trip generation (3.16 trips per 1,000 square feet). The final person trip rates were multiplied by the mobility fee per person trip, to determine the total fee per square feet or dwelling unit for individual projects within the WC2035 Plan area. (WC2035 Plan, Appendix E, p. 3)

The mobility program developed a schedule of mobility fees for a range of development scenarios that account for the land uses and FAR densities permitted by the WC2035 Plan. The fee schedule incentivizes the replacement of low-density existing development with higher-density development, reflecting the fact that higher density and co-location of a mix of uses will more fully achieve the WC2035 Plan's goals with regard to transit-oriented development. In accordance with established LADOT methodology, trip credits are permitted for existing uses on a project site proposed for redevelopment, so that only net new trips compared to existing conditions are considered in the mobility fee calculation for a given project. Existing uses are defined in the WC2035 Plan as those uses in existence as of January 1, 2008, at the time of the commencement of the environmental review process for the WC2035 Plan FEIR. The mobility program factored in the granting of fee credits in its determination of the net amount of fees required to fund the mobility improvements identified in the WC2035 Plan. (WC2035 Plan, Appendix D, Tables 1 and 2)

Pursuant to Section 7.3 of the WC2035 Plan, the payment of a mobility fee is required for development projects in the WC2035 Plan area. The mobility fee for a project is calculated based

on a project's land and size, in accordance with the Mobility Fee Table set forth in Appendix D to the WC2035 Plan. Each mobility fee payment is deposited into the Warner Center Mobility Trust Fund for the implementation of the six components of the Transportation Mitigation Plans, and other mobility measures and improvements, identified in the WC2035 Plan. The transportation and mobility improvements that will be funded by the payment of mobility fees are set forth in Appendix D to the WC2035 Plan. The traffic improvements identified in Mitigation Measures WC-TR-1 through WC-TR-98 and WC-TRS-1 in the WC2035 Plan FEIR (as discussed below) include all of the transportation and mobility improvements set forth in Appendix D to the WC2035 Plan.

WC2035 Plan FEIR Mitigation Measures

Mitigation Measures WC-TR-1 through WC-TR-98 and WC-TRS-1 in the WC2035 Plan FEIR identify a number of roadway and transit infrastructure improvements to reduce traffic impacts associated with buildout under the WC2035 Plan to a less than significant level. These improvement projects will be funded by the payment of mobility fees, which will be held in the Warner Center Mobility Trust Fund and administered by the City's Department of City Planning. As a result, the applicant for an individual development project in the WC2035 Plan area, including the proposed Project, is only responsible for paying the mobility fee for the project, and not to carry out any of the transportation infrastructure improvements identified in Mitigation Measures WC-TR-1 through WC-TR-98 and WC-TRS-1.

The WC2035 Plan FEIR recommended three mitigation measures that apply to the Project. The City has the responsibility to implement two of them, which include Mitigation Measure WC-TR-99 (which implements the assignment of mobility fees for a development process to related traffic mitigation measures in WC-TR-1 through WC-TR-98 and WC-TRS-1) and WC-TR-101 (relating to the City's implementation of a neighborhood protection program). Since the implementation of those mitigation measures are the City's responsibility, they are not included in the list of applicable traffic mitigation measures below. Mitigation Measure WC-TR-100 (Construction Mitigation Measures), which relates to potential construction traffic impacts associated with the Project, does apply to the Project. (WC2035 Plan FEIR, pp. V-33-34)

> **WC-TR-100:** Require proposed WCRCCSP [sic] projects to assess construction impacts prior to project approval. Each project will be required to develop and, if necessary, implement a construction traffic management plan, subject to LADOT approval. The construction traffic management plan will identify potential interim construction impacts and mitigation measures.

In compliance with WC-TR-100, a project-specific construction traffic impact analysis has been prepared for the Project, which is discussed below. As such, the Project has complied with the requirements of this mitigation measure.

Preliminary Driveway Traffic Volume Review

In a transportation memorandum for the Project prepared by Gibson Transportation Consulting, Inc., entitled Preliminary Driveway Traffic Volume Review, dated December 14, 2017 (Traffic Volume Review), the Project's anticipated traffic volumes were calculated to determine whether

there would be sufficient inbound and outbound queue storage at (1) the two ends of Warner Center Lane (which would be modified as part of the Project), where it intersects with De Soto Avenue and Burbank Boulevard, and (2) the driveway for Building 8 where it intersects with Burbank Boulevard. In addition, the Traffic Volume Review determined whether intersection signalization would be warranted at the following intersections:

- Warner Center Lane and De Soto Avenue/Serrania Avenue (WC2035 Plan FEIR Intersection No. 64)
- Burbank Boulevard and Warner Center Lane (WC2035 Plan FEIR Intersection No. 76)
- Burbank Boulevard and Building 8/Kaiser Driveway

The Traffic Volume Review is included in Appendix K to this Tiered IS and the results are discussed below.[112]

Project Impacts

Against the background described above, the Project's tiered impacts related to transportation and circulation are discussed below.

Would the project:

(a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant Impact.

Construction Traffic Analysis

Mitigation Measure WC-TR-100 in the WC2035 Plan FEIR requires an assessment of the Project's construction traffic impacts prior to project approval and, if necessary, the implementation of a construction traffic management plan, subject to LADOT approval. In compliance with Mitigation Measure WC-TR-100, an evaluation of the Project's construction traffic impacts is set forth below. This analysis relates to the temporary traffic impacts that may result from the construction activities associated the Project, which may include safety, operational, or capacity impacts, and was performed in accordance with the L.A. CEQA Thresholds Guide. In further compliance with

[112] Subsequent to the completion of the Preliminary Driveway Traffic Volume Review De Soto/Burbank Master Plan Project (Gibson Transportation Consulting, Inc., 2017), the Project was slightly refined by the Applicant. As originally analyzed in the traffic review, Building 3 included 254 dwelling units. The residential component of Building 3 has been reduced by 20 dwelling units, resulting in a lower count of 234 dwelling units. Relative to trip generation, this results in a reduction of 95 daily trips with seven fewer AM and eight fewer PM peak hour trips. Given that the traffic review was based on a higher dwelling unit count and higher net new trip generation, the findings of the traffic review are conservative and not changed by the refined Project.

Mitigation Measure WC-TR-100, while the Project would not have any significant construction impacts (as discussed below), a construction traffic management plan would be developed and implemented for each phase of the Project (as discussed below).

Methodology and Thresholds of Significance

The L.A. CEQA Thresholds Guide identifies four types of in-street construction traffic impacts and a number of factors for determining the significance of a project's construction-related traffic impacts. Each of the four types of construction impacts refers to a particular population that could be inconvenienced by construction activities. The four types of impacts and related populations are:

- Temporary traffic impacts: potential impacts on vehicular travelers on roadways
- Temporary loss of access: potential impacts on vehicular and pedestrian access
- Temporary loss of bus stops or rerouting of bus lines: potential impacts on bus travelers
- Temporary loss of on-street parking: potential impacts on parkers.

The analysis below is based, in part, on an estimate of construction-related trips (i.e., construction worker trips and construction truck trips) that would occur as a result of the Project.

The L.A. CEQA Thresholds Guide states that the determination of significance regarding in-street construction impacts shall be made on a case-by-case basis, considering the following factors:

Temporary Traffic Impacts:

- The length of time of temporary street closures or closures of two or more traffic lanes;
- The classification of the street (major arterial, state highway) affected;
- The existing traffic levels and level of service (LOS) on the affected street segments and intersections;
- Whether the affected street directly leads to a freeway on- or off-ramp or other state highway;
- Potential safety issues involved with street or lane closures; and
- The presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street.

Temporary Loss of Access:

- The length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;
- The availability of alternative vehicular or pedestrian access within one-quarter mile of the lost access; and
- The type of land uses affected, and related safety, convenience, and/or economic issues.

Temporary Loss of Bus Stops or Rerouting of Bus Lines:

- The length of time that an existing bus stop would be unavailable or that existing service would be interrupted;
- The availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated;
- The existence of other bus stops or routes with similar routes/destinations within a ¼ mile radius of the affected stops or routes; and
- Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).

Temporary Loss of On-Street Parking:

- The current utilization of existing on-street parking;
- The availability of alternative parking locations or public transit options (e.g. bus, train) within ¼ mile of the project site; and
- The length of time that existing parking spaces would be unavailable.

Based on the considerations above, for the purposes of this analysis, project construction would have a significant impact on traffic and circulation if construction activities were to: (1) cause substantial delays and disruption of existing traffic flow; (2) require substantial roadway and/or sidewalk closures to the extent that a hazard to roadway travelers and/or pedestrians would occur; (3) result in changes to bus/transit service such that a substantial inconvenience to riders would occur; or (4) result in the substantial loss of onsite and/or offsite parking such that parking needs in the project area would not be met.

Analysis of Construction Traffic Impacts

Potential traffic impacts from the project construction activities could occur as a result of the following types of activities:

- Increases in truck traffic associated with export or import of fill materials and delivery of construction materials;
- Increases in automobile traffic associated with construction workers traveling to and from the Project Site;
- Reductions in existing street capacity or on-street parking from temporary lane closures necessary for the construction of roadway improvements, utility relocation and drainage facilities; and
- Blocking existing vehicle or pedestrian access to other parcels fronting streets.

The following discussion addresses each of these potential impacts based on the phased construction of the Project.

Construction Phasing

The Project is anticipated to be constructed in eight phases, with the duration of each phase ranging from approximately 12 to 29 months, with overall completion anticipated in the year 2035. Each construction phase would include sub-phases for demolition, site preparation, grading, building construction, architectural coating and paving. Haul truck activity would primarily occur during the demolition and grading sub-phases; peak worker activity would occur during the building construction and architectural coating sub-phases. In addition, the construction management plan for each phase of the Project would require that all delivery/haul truck activity occur outside of the morning (AM) and afternoon (PM) peak hours to the extent feasible. Finally, as discussed in more detail in the following section, it is also anticipated that all worker traffic trips to and from the Project Site would occur outside of the peak hours.

The analysis below is based on the construction phase that would include the highest level of construction traffic. In order to provide a conservative analysis and peak scenario of potential construction traffic impacts, this construction analysis assumes that New Buildings 8 and 9, which are part of Phase 3, would be constructed at precisely the same time. Given the various sub-phases within each construction phase, the peak of Phase 3 construction activity on the Project Site would occur during the simultaneous building construction, architectural coating, and paving activity sub-phases for New Buildings 8 and 9. This construction activity includes both construction worker trips and vendor deliveries.

Temporary Construction Traffic Impacts

The transportation impacts associated with construction workers depends on the number of construction workers employed during the various sub-phases of construction, as well as the travel mode and travel time of the workers. In general, the hours of construction for a project typically require workers to be onsite before the weekday commuter morning peak period and they normally leave before or after the commuter afternoon peak period (i.e., arrive at the Project Site prior to 7:00 AM and depart before 4:00 PM or after 6:00 PM). Therefore, most, if not all, construction worker trips would occur outside of the typical weekday commuter peak periods.

The estimated number of construction worker trips each day depends on the sub-phase of construction. According to construction air quality projections prepared for the Project (provided in Appendix A, Air Quality Calculations), the building construction, architectural coating and paving sub-phases of construction would generate the most construction worker trips. Based on those projections, and as shown in **Table B-25,** *Phase 3 Peak Construction Activity Trip Generation*, the simultaneous construction of New Buildings 8 and 9 (Phase 3) would generate approximately 485 cumulative worker trips[113] per day (485 inbound trips and 485 outbound trips) for all construction components (i.e., framing, plumbing, elevators, inspections, finishing) relating to the overlapping construction sub-phases. Since the different building components would not be constructed or installed simultaneously, this cumulative estimate substantially overstates the number of worker trips that would be expected on the peak construction day.

[113] Worker trips expressed as a complete round trip (i.e., inbound and outbound).

TABLE B-25
PHASE 3 PEAK CONSTRUCTION ACTIVITY TRIP GENERATION

Construction Activity	Daily Trip Ends Volume	Morning (AM) Peak Hour			Afternoon (PM) Peak Hour		
		In	Out	Total	In	Out	Total
Building Construction (7/1/2023-11/29/2024)							
Construction Worker Trips	392	78	0	78	0	78	78
Vendor Truck Trips	172	6	6	12	6	6	12
PCE Adjusted Trips[a]	344	12	12	24	12	12	24
Sub-Phase Total (PCE Adjusted Trips)	736	90	12	102	12	90	102
Architectural Coatings (4/1/2024-12/1/2024)							
Construction Worker Trips	78	16	0	16	0	16	16
Paving (5/2/2024-11/1/2024)							
Construction Worker Trips	15	3	0	3	0	3	3
Cumulative Overlapping Construction Activity							
Construction Worker Trips	485	97	0	97	0	97	97
Vendor Truck (PCE Adjusted) Trips	344	12	12	24	12	12	24
New Construction Trips[b]	829	109	12	121	12	109	121
Phase 3 Existing Trips to be Removed[c]	(589)	(74)	(10)	(84)	(13)	(66)	(79)
Net New Construction Trips	**240**	**35**	**2**	**37**	**(1)**	**43**	**42**

Notes: Phase 3 peak construction activity defined as the overlap of the building construction, architectural coatings, and paving activity sub-phases. Table 25 identifies the types of trips generated by the construction activity associated with each sub-phase.
[a] *A Passenger Car Equivalent (PCE) factor of 2.0 was applied to all truck trips based on standard traffic engineering practice to conservatively estimate the equivalent number of vehicles associated with the trucks.*
[b] New construction trips generated by 485 construction worker and 172 vendor truck trips.
[c] Phase 3 existing trips to be eliminated as identified in *Preliminary Driveway Traffic Volume Review* (Gibson Transportation Consulting, Inc., 2017)

As stated above, worker trips to and from the Project Site are anticipated to occur outside of the peak hours (i.e., arrive at the Project Site prior to 7:00 AM and depart before 4:00 PM or after 6:00 PM). Therefore, most, if not all, construction worker trips would occur outside of the typical weekday commuter peak periods. However, for the purpose of this analysis, it has been conservatively assumed that 20 percent of the inbound daily construction worker trips would arrive at the Project Site during the morning (AM) peak hour and that 20 percent of the outbound daily construction worker trips would depart the Project Site during the afternoon (PM) peak hour. As shown on Table 25, this results in 97 morning peak hour trips (inbound) and 97 afternoon peak hour trips (outbound).

The peak construction activity for Phase 3 would also require approximately 172 daily vendor trips[114], assumed as deliveries by truck, as shown on Table 25. With 172 inbound and 172 outbound vendor trips forecast to occur during this period of overlapping construction, it is anticipated that those trips would occur during a six-hour period (9:00 AM and 3:00 PM) between the morning and

[114] Vendor trips expressed as a complete round trip (i.e., inbound and outbound).

afternoon peak hours. However, for the purposes of this analysis, it has been conservatively assumed that 20 percent of the vendor trips may arrive and depart during the morning and afternoon peak hours. This represents 12 morning peak hour vendor trips (6 inbound and 6 outbound) and 12 afternoon peak hour trips (6 inbound and 6 outbound).

Based on regionally accepted standards, and as shown on Table 25, a passenger car equivalency (PCE) of 2.0 was applied to adjust the 172 daily vendor trips to 344 daily PCE trips.[115] Similarly, the 12 hourly truck trips would be equivalent to 24 hourly PCE trips during the morning peak hour (12 inbound and 12 outbound trips) and 24 hourly PCE trips during the afternoon peak hour (12 inbound and 12 outbound).

The construction of New Buildings 8 and 9 would also require the removal of the three Existing Buildings located within the boundaries of the Phase 3 site. As identified in *Preliminary Driveway Traffic Volume Review* (Gibson Transportation Consulting, Inc., 2017), those Existing Buildings generate 589 daily trips with 84 morning (AM) peak hour trips (74 inbound with 10 outbound) and 79 afternoon (PM) peak hour trips (13 inbound with 66 outbound). As shown on Table 25, these existing peak hour trips are subtracted from the peak hour construction trips to determine the net peak hour trips associated with the construction of New Buildings 8 and 9.

Based on these data and assumptions, and as summarized on Table 25, the simultaneous construction of New Buildings 8 and 9 would generate a peak total of approximately 240 net new daily construction trips, including 37 net new morning peak hour trips (35 inbound with 2 outbound) and 42 net new afternoon peak hour trips (a reduction of one inbound trip with 43 outbound).

By comparison, as identified in *Preliminary Driveway Traffic Volume Review*, the operation of New Buildings 8 and 9 is anticipated to generate approximately 3,072 net new daily trips during a typical weekday, including approximately 414 net new vehicle trips (363 inbound and 51 outbound) during the morning peak hour and 401 net new vehicle trips (71 inbound and 330 outbound) during the afternoon peak hour. Therefore, the construction of Phase 3 would generate significantly fewer trips than during the operation of those phases.

As discussed below with respect to the Project's operational traffic impacts, the WC2035 Plan FEIR adequately addressed the Project's operational impacts because (1) the Project Site is located in TAZ 19, one of the 26 TAZs for the WC2035 Plan area that provided the basis for the traffic analysis in the WC2035 Plan FEIR, (2) the traffic analysis in the WC2035 Plan FEIR therefore included the anticipated traffic impacts associated with the redevelopment of the Project Site and (3) the density of the Project (2.52:1 FAR) is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR (3:1 FAR).

[115] *Transportation Research Circular No. 212, Interim Materials on Highway Capacity* (Transportation Research Board, 1980) (*Transportation Research Circular No. 212)* defines passenger car equivalency (PCE) for a vehicle as the number of through moving passenger cars to which it is equivalent based on the vehicle's headway and delay-creating effects. Table 8 of *Transportation Research Circular No. 212* and Exhibit 16.7 of *2010 Highway Capacity Manual* (Transportation Research Board, 2010) suggest a PCE of 2.0 for trucks.

Therefore, given that the WC2035 Plan FEIR adequately addressed the operational traffic impacts associated with the Project, it also adequately addressed the Project's construction traffic impacts because the peak construction trips during the construction of Phase 3 would be only a fraction of the operational traffic trips associated with Phase 3 and the same would be true for all of the other project phases. In any event, it is reasonable to conclude that, based on the significantly lower vehicular trip generation during construction as compared to project operation, as well as the small numbers of net construction trips during the morning peak hour (37) and the afternoon peak hour (42) as compared to the existing condition, the Project would not cause substantial delays and disruption of existing traffic flow, and construction traffic impacts associated with the Project would be less than significant. Moreover, as discussed below, the construction management plan would identify specific actions to further reduce the Project's construction trip impacts where feasible.

With respect to the haul route for construction vehicles, the WC2035 Plan FEIR includes Mitigation Measure WC-AQ-9, which requires that developers ensure that construction vehicles avoid, to the extent feasible, travel on streets immediately adjacent to Woodland Hills Academy Middle School. Given the Project Site's proximity to Woodland Hills Academy Middle School (to the southeast, across De Soto Avenue), the Project's haul routes will be developed, to the extent feasible, to comply with Mitigation Measure WC-AQ-9. Subject to Mitigation Measure WC-AQ-9, project construction vehicles would use the most direct route to transport demolition and construction debris from the Project Site to the designated landfill.

For all of these reasons, the construction trip impact was adequately addressed in the WC2035 Plan FEIR and, in any event, the Project would not cause substantial delays and disruption of existing traffic flow, the temporary construction traffic impacts associated with the Project would be less than significant and the implementation of the construction traffic plan for each phase of the Project would further reduce the less than significant impact.

Access and Safety Impacts

Construction activities are expected to be contained within the Project Site, although. Construction fences may encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site. Construction staging activities and construction worker parking could potentially be located onsite in the parking lanes along Warner Center Lane because it is a private street located within the Project Site. It is anticipated that, because the Project includes multiple phases, portions of the 24-acre Project Site unrelated to a construction phase could be used for the staging of construction activities and equipment, the storage of construction materials, and potentially for construction worker parking. The containment of construction activities onsite would minimize for disrupting existing traffic flow or requiring the closure of a roadway lane on Burbank Boulevard or De Soto Avenue.

It is not anticipated that any lane closures would be required for onsite project construction activities. There may be limited instances, lasting a few hours per occurrence, during the course of construction of a phase of the Project, such as utility work within the street on De Soto Avenue, Burbank Boulevard and/or Warner Center Lane and the widening of De Soto Avenue, that may

require the use of traffic control devices, such as traffic safety cones, to slightly modify vehicular traffic flow and/or the use of flaggers to maintain two-way traffic flow on these streets. This work would be temporary in nature (e.g., during daytime hours over the course of one or a few days) and would be coordinated under review and approval with the appropriate City agencies, as needed. Temporary closures of the sidewalks adjacent to the Project Site on Warner Center Lane, Burbank Boulevard and/or De Soto Avenue may be required during portions of the construction period for project phases. More specifically as part of several of the construction phases, the public rights-of-way along De Soto Avenue and Burbank Boulevard would be upgraded with improved sidewalks, landscaping and street trees, which would require temporary rerouting of pedestrian traffic as the sidewalks fronting the Project Site would be closed.

As such, the use of the public right-of-way along Warner Center Lane, Burbank Boulevard and/or De Soto Avenue could require temporary rerouting of pedestrian traffic that could result in the temporary loss of access to sidewalks along those streets. While these temporary measures would not result in a significant construction traffic impact, in order to further reduce any potential impact and ensure pedestrian safety, the construction management plan would identify the location of any temporary street parking or sidewalk closures, provide for the posting of signs advising pedestrians of temporary sidewalk closures and provide alternative routes (including directional signage), provide for the installation of other construction-related warning signs, and provide for maintaining continuous and unobstructed pedestrian paths.

Construction activities associated with the Project could also potentially impact the provision of services by the Los Angeles Fire Department and the Los Angeles Police Department in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Specifically, access to the Project Site and could be temporarily impacted by project-related construction activities, such as the construction of utility line connections. Construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic.

These short-term and temporary construction activities could temporarily increase response times for emergency vehicles along Warner Center Lane, Burbank Boulevard and/or De Soto Avenue during a construction phase and other main connectors due to travel time delays caused by traffic. However, as discussed above, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts. While these temporary and short-term construction activities would have a less-than-significant impact on emergency response times, as previously discussed, the construction plan for each phase of the Project would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate and temporary construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

Project construction is not expected to create hazards for roadway travelers, bus riders, or parkers, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (to address temporary traffic control, lane closures, sidewalk closures, etc.)

would be included into the construction management plan, as discussed below. As discussed below, the construction management plan would include measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering).

For these reasons, the Project would not require substantial roadway and/or sidewalk closures to the extent that a hazard to roadway travelers and/or pedestrians would occur. Therefore, access and safety impacts during construction of the Project would be less than significant and the implementation of the construction management plan described below would further reduce those less than significant impacts.

Bus/Transit Impact

There are two bus stops located immediately adjacent to the Project Site, one on De Soto Avenue (Los Angeles County Metro Line 244 and Santa Clarita Transit Commuter Express Line 796) and the other on Burbank Boulevard (Ventura County Transportation Commission Highway 101/Conejo Connection and Antelope Valley Transit Authority Line 787). In addition, the Metro Shuttle Line 601 is the recently implemented Warner Center Shuttle, which now provides two stops located adjacent to and on the Project Site – one stop is located at the northwest intersection of Burbank Boulevard and De Soto Avenue and the other stop to the west of that along Warner Center Lane, just north of Burbank Boulevard – and runs through the Project Site along Warner Center Lane. The construction of the required offsite roadway improvements along De Soto Avenue and construction activity along Burbank Boulevard or Warner Center Lane with respect to applicable phases of the Project may require the temporary relocation of one or more of these bus stops, but that construction work is not anticipated to require the rerouting of any bus line. Nearby locations are available for use as temporary bus stops within 600 feet walking distance from the current bus stop locations. Because the Project Site is relatively large and the construction would occur on a phased basis, the Applicant has substantial flexibility to limit potential service disruptions to the shortest possible period and to accommodate the bus/transit services such that a substantial inconvenience to bus riders would not occur. This impact would be less than significant and the implementation of the construction management plan described below would further reduce this less than significant impacts.

On-Street Parking Impact

No street parking is allowed on the segments of Burbank Boulevard and De Soto Avenue adjacent to the Project Site. Therefore, the construction of the Project would not require the temporary loss of any parking spaces on those streets. On-street parking is available within the Project Site, along Warner Center Lane, which is provided as an amenity to tenants/visitors, in addition to the required off-street parking for the Existing Buildings. To the extent that portions of the parking lanes along Warner Center Lane may be intermittently utilized for construction activity, a temporary loss of on-street parking may result. However, the required off-street parking would remain fully available for use by site tenants/visitors. Therefore, the Project would not result in the substantial loss of onsite and/or offsite parking such that parking needs in the project area would not be met. This impact would be less than significant and the implementation of the construction management plan described below would further reduce this less than significant impact.

Construction Management Plan

Prior to the start of construction for each phase of the Project, and in accordance with Mitigation Measure WC-TR-100, the Applicant would prepare and submit to LADOT, for its review and approval, a detailed construction management plan would be prepared and submitted to LADOT for review and approval. The construction management plan would formalize how construction would be carried out and identify specific actions that would be required to reduce transportation and circulation impacts on the surrounding community. The construction management plan for each project phase shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Advance notification to adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.
- Prohibition of construction-related vehicles parking on nearby residential streets.
- Require offsite parking for construction related vehicles, if necessary.
- Coordinate with the general contractor to minimize haul truck trips and vendor deliveries during the morning and afternoon peak hours.
- Coordinate with the general contractor to schedule work shifts to minimize construction trips during the morning and afternoon peak hours.
- Coordinate with the Warner Center TMO to promote the use of alternate travel modes, to the extent feasible, in order to reduce construction worker trips to the Project site.
- Temporary pedestrian and vehicular traffic controls during all construction activities adjacent to De Soto Avenue and Burbank Boulevard to ensure traffic safety within public rights-of-way. These controls shall include, but are not limited to, flag people trained in pedestrian and student safety.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, including along all identified Los Angeles Unified School District (LAUSD) pedestrian routes to nearby schools.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, and so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to nearby schools.
- Coordination with public transit agencies to provide advanced notifications of bus stop relocations and durations.

- Provision of advanced notification of temporary parking removals and duration of removals.
- Provision of detour plans to address temporary road closures during construction.

Intersection Levels of Service

The WC2035 Plan FEIR determined that 87 of the 152 intersections analyzed in the WC2035 Plan area would be significantly impacted by buildout under the WC2035 Plan (WC2035 Plan DEIR, pp. 4.12-65-71). Physical intersection improvements were identified as feasible at all but one of the significantly impacted intersections (WC2035 Plan DEIR, pp. 4.12-79-90). With the implementation of Mitigation Measures WC-TR-1 through WC-TR-98 and WC-TRS-1, the WC2035 Plan would only have a significant and unavoidable impact at one intersection (Variel Avenue/Victory Boulevard) (WC2035 Plan DEIR, pp. 4.12-94-112). The WC2035 Plan FEIR further concluded that, if the Variel Avenue Corridor Improvements were not implemented as a system-wide mitigation measure, an additional three intersections would have a significant and unavoidable impact (Canoga Avenue/Sherman Way, Owensmouth Avenue/Saticoy Street, Winnetka Avenue/Vanowen Street) (WC2035 Plan DEIR, p. 4.12-95). Therefore, these traffic measures would almost fully mitigate the intersection traffic impacts at the plan level.

This analysis adequately addresses the Project's intersection impacts. The Project Site is located in TAZ 19, one of the 26 TAZs for the WC2035 Plan area that provided the basis for the traffic analysis in the WC2035 Plan FEIR (WC2035 Plan DEIR, p. 4.12-39). Therefore, the traffic analysis in the WC2035 Plan FEIR included the anticipated traffic impacts associated with the redevelopment of the Project Site.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1, and this assumed development intensity was assigned to TAZ 19 for the traffic analysis (WC2035 Plan DEIR, pp. 2-5-6). In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced intersection impact as compared to the impact assumed in the WC2035 Plan EIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's intersectional impacts.

In addition, after applying transportation demand management (TDM) and transit-oriented development (TOD) car trip reductions to the modeled trip generation for the WC2035 Plan area, the total peak hour trips estimated to be generated by full build-out (Year 2035) of TAZ 19 is 2,308 during the AM peak hour and 2,981 during the PM peak hour (WC2035 Plan DEIR, Appendix G.6, Model Data, pp. 7-8). According to the *Preliminary Driveway Traffic Volume Review* (Gibson Transportation Consulting, Inc., 2017), the Project would generate 1,309 net new AM peak hour vehicle trips and 1,399 net new PM peak hour vehicle trips (Traffic Volume Review, Table 1). In other words, the Project would generate approximately 57 percent and 47 percent of the AM and PM peak hour vehicle trips, respectively, that were approved for TAZ 19 in the WC2035 Plan FEIR.

Finally, the Project would have a minimal impact on the one intersection that would be significantly impacted by full buildout under the WC2035 Plan (Variel Avenue/Victory Boulevard) due to its distance from the Project Site. As a result, the Project would only contribute a small portion of the overall anticipated increase in traffic at the Variel Avenue/Victory Boulevard intersection.

Potential Extension of Variel Avenue

As part of the Project, Warner Center Lane would be improved in compliance with the WC2035 Plan's "New Street" standards. The Project also includes a north/south driveway, designated as Town Center Drive, from Warner Center Lane to the north property line. These onsite improvements provide for circulation through the Project Site in the approximate location of a portion of the potential route to extend Variel Avenue from Califa Street to Burbank Boulevard, as described in Section 6.1.2.2.10 of the WC2035 Plan. Currently, however, the potential Variel Avenue extension cannot be implemented because other portions of the extension route between Califa Street and the northern boundary of the Project Site are occupied by existing buildings. In the event that, following buildout of the Project, Variel Avenue can be, and is, extended from Califa Street to the northern boundary of the Project Site, then at such time the portions of Warner Center Lane and the north/south driveway on the Project Site that are in the approximate location of the portion of the Variel extension route located on the Project Site could be used to complete the Variel extension, while still functioning as part of the onsite circulation system.

Arterial Levels of Service

The WC2035 Plan FEIR included arterial segment analysis on an area-wide programmatic basis/plan level. The WC2035 Plan FEIR determined that four of the 52 arterial roadway segments analyzed would be significantly impacted by buildout under the 2035 Plan (WC2035 Plan DEIR, pp. 4.12-65, 73-74). Physical improvements were identified as feasible at one of the significantly impacted arterial roadway segments (WC2035 Plan DEIR, pp. 4.12-91). With the implementation of the intersection and arterial improvements, the WC2035 Plan would only have a significant and unavoidable impact on one arterial segment (Canoga Avenue between Ventura Boulevard and Oxnard Street) (WC2035 Plan DEIR, pp. 4.12-112-115). Therefore, these traffic measures would almost fully mitigate the arterial segment traffic impacts at the plan level.

The City does not require the analysis of arterial segments for individual development projects. Nonetheless, for informational purposes, it is noted that the WC2035 Plan FEIR adequately addressed the Project's impact on arterial segments. The Project Site is located in TAZ 19, one of the 26 TAZs for the WC2035 Plan area that provided the basis for the traffic analysis in the WC2035 Plan FEIR (WC2035 Plan DEIR, p. 4.12-39). Therefore, the arterial segment analysis in the WC2035 Plan FEIR included the anticipated arterial segment impacts associated with the Project.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1, and this assumed development intensity was assigned to TAZ 19 for the traffic analysis (WC2035 Plan

DEIR, pp. 2-5-6). In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced impact on arterial segments as compared to the impact assumed in the WC2035 Plan EIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's potential arterial segments impact.

Residential Street/Neighborhood Intrusion Impact Analysis

The WC2035 Plan FEIR determined that unforeseeable impacts on local residential streets could result from buildout under the WC2035 Plan, as drivers in the increasingly densely developed Plan area sought alternate routes and cut through residential neighborhoods. A total of 41 intersections within the WC2035 Plan area with an unmitigated level of service (LOS) of F during the AM or PM peak hour were identified as having the potential to generate cut-through traffic in adjacent residential neighborhoods. (WC2035 Plan DEIR, pp. 4.12-75-77) The WC2035 Plan FEIR ranked the 41 study intersections that are projected to operate at LOS F with full buildout under the WC2035 Plan for their potential to result in unforeseeable neighborhood circulation impacts.

The WC2035 Plan FEIR concluded that, with the implementation of the traffic mitigation improvements identified in Mitigation Measures WC-TR-1 through WC-TR-98 and WC-TRS-1, the number of intersections with an LOS of F during the AM or PM peak hour would be reduced from 41 to 15, a substantial improvement. The highest-risk neighborhoods were directly adjacent to the north and northeast boundaries of the WC2035 Plan area, also to the southwest of the Plan area. (WC2035 Plan DEIR, pp. 4.12-93-94)

The WC2035 Plan DEIR also recommended Mitigation Measure WC-TR-101, which directs the City to implement a Neighborhood Protection Program. The WC2035 Plan requires a portion of the collected mobility fees for this purpose, in particular to address and mitigate any unforeseeable neighborhood traffic impacts as they arise from buildout under the WC2035 Plan. The WC2035 Plan FEIR indicated that, with the implementation of Mitigation Measure WC-TR-101, the impact of the WC2035 Plan on neighborhood circulation would be less than significant. (WC2035 Plan DEIR, p. 4.12-93)

This analysis adequately addresses the Project's neighborhood circulation impact. The Project Site is located in TAZ 19, one of the 26 TAZs for the WC2035 Plan area that provided the basis for the traffic analysis in the WC2035 Plan FEIR (WC2035 Plan DEIR, p. 4.12-39). Therefore, the traffic analysis in the WC2035 Plan FEIR included the anticipated traffic impacts associated with the redevelopment of the Project Site.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1, and this assumed development intensity was assigned to TAZ 19 for the traffic analysis (WC2035 Plan DEIR, pp. 2-5-6). In comparison, the Project has a substantially lower FAR of 2.52:1. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's neighborhood circulation impact.

In addition, none of the 15 study intersections that would operate at an LOS of F following mitigation are located in TAZ 19, where the Project Site is located. Relatedly, none of the existing residential areas that have the highest risk of cut-through circulation impacts are located in proximity to the Project Site. Those areas, as discussed in the WC2035 Plan FEIR, are located to the north, northeast and southwest of the WC2035 Plan Area.

For these reasons, the WC2035 Plan FEIR adequately addressed the Project's potential 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. With the payment of the required mobility fee for the Project and other development projects in the WC2035 Plan area, as required by the WC2035 Plan, and the City's assignment of mobility fees applicable components of the Transportation Mitigation Plans, and other mobility measures and improvements, identified in the WC2035 Plan in accordance with Mitigation Measure WC-TR-99, the impacts of buildout under the WC2035 Plan (including the development of the Project) on intersections and arterial segments within the WC2035 Plan area have been mitigated or avoided. With regard to neighborhood circulation impacts, the City's implementation of WC-TR-101 would ensure that the Project's impact on neighborhood circulation would be less than significant.

(b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, the WC2035 Plan area contains five Congestion Management Program (CMP)-monitored intersections and one CMP freeway mainline monitoring station. The WC2035 Plan FEIR determined that buildout under the WC2035 Plan would have a significant impact on all five of the CMP intersections located within the WC2035 Plan area without mitigation. However, with the implementation of Mitigation Measures WC-TRS-1 and WC-TR-1 through WC-TR-98, the impacts on those intersections would be reduced to a less-than-significant level.

The WC2035 Plan would not have a significant impact on freeway traffic because the number of peak hour vehicle trips projected to be generated by buildout under the WC2035 Plan would not exceed 150 trips in either travel direction along the mainline of the US-101 Ventura Freeway at Winnetka Avenue, which is nearest CMP freeway mainline monitoring station. (WC2035 Plan DEIR, pp. 4.12-73, 75)

This analysis adequately addresses the Project's impact on CMP intersections and freeway mainline volumes. The Project Site is located in TAZ 19, one of the 26 TAZs for the WC2035 Plan area that provided the basis for the traffic analysis in the WC2035 Plan FEIR (WC2035 Plan DEIR, p. 4.12-39). Therefore, the traffic analysis in the WC2035 Plan FEIR included the anticipated traffic impacts associated with the redevelopment of the Project Site.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1, and this assumed development intensity was assigned to TAZ 19 for the traffic analysis (WC2035 Plan DEIR, pp. 2-5-6). In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced impact on CMP intersection and freeway mainline volumes as compared to the impacts assumed in the WC2035 Plan EIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's CMP facilities impacts.

Therefore, consistent with the analysis and conclusion in the WC2035 Plan FEIR, the Project would result in a less-than-significant impact associated with CMP facility performance, and this impact was adequately addressed in the WC2035 Plan FEIR.

(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?

No Impact. This impact was not evaluated in the WC2035 Plan FEIR. The Project is not located in the immediate vicinity of an airport or private airstrip. The nearest public airport is the Van Nuys Airport, located at 16461 Sherman Way, approximately 6.5 miles northeast from the Project Site. There are no private airport facilities located in proximity to the Project Site. Therefore, project activities would not alter the existing air traffic patterns, levels, or locations that result in safety risks, and therefore no impact would occur.

(d) 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. This impact was not evaluated in the WC2035 Plan FEIR. All of the residential, office, retail, restaurant and hotel uses proposed for the Project are permitted uses under the WC2035 Plan are compatible with one another and with adjacent existing uses. The Traffic Volume Review prepared for the Project evaluated vehicle queuing conditions and whether traffic signals would be warranted at the three primary access points between the Project Site and the local roadway network. Based on the traffic volumes developed for this analysis, the site access design is able to adequately serve the projected traffic volumes of the Project, so that the Project would not substantially increase traffic hazards due to any design feature. A summary of the results of this analysis is provided below. Further detail is provided in Appendix K to this Tiered IS.

Signal Warrant Analysis

The Traffic Volume Review includes preliminary signal warrant analyses to determine whether and when the development of the Project would create a need for new traffic signals at the following three intersections in order to facilitate access to the Project Site:

- Warner Center Lane and De Soto Avenue/Serrania Avenue (WC2035 Plan FEIR Intersection No. 64)
- Burbank Boulevard and Warner Center Lane (WC2035 Plan FEIR Intersection No. 76)
- Burbank Boulevard and Building 8/ (across the street from the Kaiser Driveway)

The technical evaluation follows the guidelines set forth in *Manual of Policies and Procedures* (LADOT, December 2008) and *California Manual on Uniform Traffic Control Devices* (California Department of Transportation, 2014) (CA MUTCD). The signal warrant analysis takes into account peak hour traffic volumes and the total number of travel lanes for each intersection approach. (Traffic Volume Review, pp. 4-5)

The analysis determined that the peak hour warrant for the De Soto Avenue/Warner Center Lane intersection would be met following the development of Phase 3 of the Project. However, given the number of collisions that have occurred in recent years along the segment of De Soto Avenue between Burbank Boulevard and Califa Street, the installation of a traffic signal at that intersection might be appropriate in connection with an earlier phase of the Project, and would be consistent with goal of the City's *Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025* (City of Los Angles, August 2015). (Traffic Volume Review, pp. 5-7)

The analysis determined that the peak hour warrant for the Burbank Boulevard/Warner Center Lane intersection would be satisfied following the development of Phase 1 of the Project, although the potential signalization of this intersection would likely not occur until a later phase (Traffic Volume Review, p. 7). Finally, the peak hour warrant for the Burbank Boulevard/Building 8 Driveway intersection would be satisfied following the development of New Building 8. (Traffic Volume Review, p. 8)

Queuing Analysis

The Traffic Volume Review also includes preliminary queuing analyses for the same three intersections that were evaluated for signal warrants. With respect to the De Soto Avenue/Warner Center Lane intersection, it determined that, with the installation of a traffic signal in conjunction with the development of Phase 1 of the Project, both the De Soto Avenue and Warner Center Lane approaches would have sufficient queue storage. With regard to the Burbank Boulevard/Warner Center Lane intersection, it determined that, with the installation of a traffic signal in conjunction with the development of Phase 7 of the Project, both the Burbank Boulevard and Warner Center Lane approaches would have sufficient queue storage. Finally, with respect the Burbank Boulevard/Building 8 Driveway, it determined that, with the installation of a traffic signal in conjunction with the development of New Building 8, the Burbank Boulevard approach would have sufficient queue storage. (Traffic Volume Review, pp. 8-10)

For these reasons, the Project would not create or substantially increase a hazard due to a design feature or incompatible uses, and this impact would therefore be less than significant.

(e) Result in inadequate emergency access?

Less Than Significant Impact. The WC2035 Plan FEIR noted that the decrease in the rate of auto trips and increased utilization of transit and other alternative modes in the WC2035 Plan area would potentially reduce system-wide injury and fatality rates. The WC2035 Plan FEIR concluded that, in any event, with the implementation of the mitigation measures identified in WC-TRS-1 and WC-TR-1 through WC-TR-98 have been implemented at the significantly impacted intersections and arterial street segments, the WC2035 Plan buildout was not expected to impact emergency vehicle access because only one intersection and one arterial street segment would remain significantly impacted. (WC2035 Plan DEIR, p. 4.12-78)

This analysis fully applies to the Project. The Project Site is located in TAZ 19, one of the 26 TAZs for the WC2035 Plan area that provided the basis for the traffic analysis in the WC2035 Plan FEIR (WC2035 Plan DEIR, p. 4.12-39). Therefore, the traffic analysis in the WC2035 Plan FEIR included the anticipated traffic impacts associated with the redevelopment of the Project Site, and Mitigation Measures WC-TRS-1 and WC-TR-1 through WC-TR-98 would eliminate the Project's potential impact on emergency access.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1, and this assumed development intensity was assigned to TAZ 19 for the traffic analysis (WC2035 Plan DEIR, pp. 2-5-6). In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced impact on emergency access as compared to the impact assumed in the WC2035 Plan EIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's potential emergency access impact.

Therefore, the Project would have no impact on emergency access, and this impact was adequately addressed in the WC2035 Plan FEIR.

(f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. The bicycle and pedestrian components of this impact criterion were not evaluated in the WC2035 Plan FEIR. Class II Bicycle Lanes are located adjacent to the Project Site on De Soto Avenue, and 10- to 12-foot-wide sidewalks are provided along all Project Site frontages. Implementation of the Project would not disrupt or require the removal of any of these bicycle or pedestrian facilities. Therefore, the Project would result in a less-than-significant impact associated with bicycle and pedestrian facilities.

As noted in the WC2035 Plan FEIR, the WC2035 Plan's transit component calls for the addition of a local serving transit service capable of accommodating the 6,740 PM peak hour transit trips anticipated with full buildout under the Plan. To achieve this, the WC2035 Plan includes the implementation of a 40-bus local circulator system gradually over the life of the Plan, as well as

the construction of a fourth Orange Line Bus Rapid Transit Terminal Station in WC2035 Plan area. Both of these measures were included in the development assumptions underlying the WC2035 Plan FEIR and have a dedicated funding component through implementation of the mobility fee requirement for each project. These improvements are necessary to meet the forecasted transit demand, and to provide the forecasted TOD coverage throughout the WC2035 Plan area. It is expected that there will also be a regular increase in the Metro bus transit services in Warner Center as part of Metro's ongoing regional and local service expansion in response to growth in ridership demand. This component is expected to be funded through standard Metro funding sources and is not covered by the mobility fee established in the WC2035 Plan. (WC2035 Plan DEIR, p. 4.12-91)

This analysis applies in equal measure to the Project. The Project Site is located in TAZ 19, one of the 26 TAZs for the WC2035 Plan area that provided the basis for the traffic analysis in the WC2035 Plan FEIR (WC2035 Plan DEIR, p. 4.12-39). Therefore, the traffic analysis in the WC2035 Plan FEIR included the anticipated traffic impacts associated with the redevelopment of the Project Site, which analysis was based in part on the implementation of the transit component in the WC2035 Plan.

Moreover, the density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1, and this assumed development intensity was assigned to TAZ 19 for the traffic analysis (WC2035 Plan DEIR, pp. 2-5-6). In comparison, the Project has a substantially lower FAR of 2.52:1, which means that the Project would have a reduced impact on transit services as compared to the impact assumed in the WC2035 Plan EIR. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's potential transit impact.

In addition, the Project Site is currently served by one bus line operated by the Ventura County Transportation Commission (VCTC) Intercity (Highway 101/Conejo Connection), and two bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) (Rapid 787 and Local 244/245). In addition, the Metro Shuttle Line 601 is the recently implemented Warner Center Shuttle, which now provides two stops located adjacent to and on the Project Site – one stop is located at the northwest intersection of Burbank Boulevard and De Soto Avenue and the other stop to the west of that along Warner Center Lane, just north of Burbank Boulevard – and runs through the Project Site along Warner Center Lane. The development of the Project would not require the removal of any bus stop, nor does the Project include any component that would impede transit operations along Burbank Boulevard or De Soto Avenue.

For these reasons, the Project would result in a less-than-significant impact associated with transit, and this impact was adequately addressed in the WC2035 Plan FEIR.

(g) Result in inadequate parking capacity?

The Project includes a total of 5,579 parking spaces, in compliance with the applicable parking requirements in Section 6.2.3.2 of the WC2035 Plan and, as applicable, the LAMC. With respect to residential uses, Section 6.2.3.2.1(a) requires at least one parking space per unit and not more than two parking spaces per unit. The Project includes 1,009 residential units. Therefore, the Project must include a minimum of 1,009 parking spaces and a maximum of 2,018 parking spaces for the proposed residential uses. The Project provides 1,627 parking spaces for residential uses, which exceeds the minimum number of spaces and is less than the maximum number of spaces permitted. While no guest parking is required for the Project (see Section 6.2.3.2.1(b)), the additional parking provided above the minimum residential parking requirement may be allocated for guest parking. Accordingly, the Project is compliant with the number of residential parking spaces required for the Project.

With respect to non-residential uses, the Project includes a total of 3,921 parking spaces for the proposed office, restaurant/retail and hotel uses. Section 6.2.3.2.2 of the WC2035 Plan requires (1) for office use, a minimum of one parking space per 1,000 square feet of floor area and up to a maximum of four parking spaces per 1,000 square feet of floor area and (2) for other commercial uses, a minimum of two parking spaces per 1,000 square feet of floor area and up to a maximum of four parking spaces per 1,000 square feet of floor area. Pursuant to Section 12.21A.4(b) of the LAMC, a hotel use requires (1) one parking space for each guest room for the first 30 rooms, (2) one additional parking space for each two guest rooms in excess of 30 but not exceeding 60 and (3) one additional parking space for each three guest rooms in excess of 60.

Based on these requirements, the Project's office uses require a minimum of 1,141 parking spaces and a maximum of 4,562 parking spaces. In comparison, the Project provides 3,430 parking spaces for the office uses, which is above the minimum and approximately midway between the minimum and maximum requirements. For the restaurant/retail uses, a minimum of 174 parking spaces and a maximum of 344 parking spaces are required. In comparison, the Project provides 308 parking spaces for the restaurant/retail uses, which exceeds the minimum requirement and is less than the maximum requirement. The Project's hotel use requires a minimum of 101 parking spaces, while the Project provides 195 parking spaces for hotel use, which exceeds the minimum requirement by 82 spaces.

At the time the Applicant filed its application for the Project, it proposed 1,340 long-term bicycle parking spaces and 282 short-term bicycle spaces, for a total of 1,622 bicycle parking spaces. The City has since amended its bicycle parking ordinance, which has resulted in a reduction of required bicycle parking for the Project. Accordingly, the Project will include 870 long-term bicycle parking spaces and 264 short-term bicycle parking spaces, for a total of 1,134 bicycle parking spaces. In addition, a minimum of 280 parking spaces for motorcycles/scooters will be included as part of the Project.

As the Project provides automobile and bicycle parking in compliance with requirements of the WC2035 Plan and the LAMC, the Project's parking impacts would be less than significant.

17. Tribal Cultural Resources

Analysis in WC2035 Plan FEIR

Potential impacts to tribal cultural resources were not addressed as a separate topic in the WC2035 Plan FEIR, as this environmental topic was added to the Checklist in Appendix G to the State CEQA Guidelines after certification of the WC2035 Plan FEIR as a result of the passage and implementation of Assembly Bill (AB) 52. As such, an analysis of potential impacts on tribal cultural resources is provided in the Tiered IS.

Assembly Bill 52

AB 52 was approved by California State Governor Edmund Gerry "Jerry" Brown, Jr. on September 25, 2014. AB 52 amended California Public Resource Code (PRC) Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. The primary intent of AB 52 is to include California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under CEQA, known as tribal cultural resources. PRC Section 21074(a)(1) and (2) define tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. Unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria. On July 30, 2016, the California Natural Resources Agency adopted the final text for tribal cultural resources provided in Appendix G to the State CEQA Guidelines, which was approved by the Office of Administrative Law on September 27, 2016.

PRC Section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency (PRC Section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC Sections 21080.3.1(d) and 21080.3.1(e)).

On June 14, 2017, pursuant to PRC Section 21080.3.1(b), the City as the lead agency sent consultation notification letters by certified mail to the California Native American Tribes that requested notification of any proposed projects in the geographic area, as shown in **Table B-26**, *Summary of AB 52 Consultation*. The letters, provided in Appendix L to this Tiered IS, included a

description of the Project, the Project location, and a notification that the tribe had 30 days to request consultation with the City. The City received a response from one tribe, the Fernandeno Tatviam Band of Mission Indians, within the 30-day response period. That response is set forth in an August 2, 2017 email from a Tribal Historic and Cultural Preservation Department Technician Sara Hansen, pursuant to which she initiated AB 52 consultation in response to the City's notification. The City engaged in AB 52 consultation by email correspondence and a phone call on December 12, 2019 with Jairo Avila, Tribal Historic and Cultural Preservation Officer. During the consultation with the Fernandeno Tatviam Band of Mission Indians, the Tribe did not present any evidence that any tribal cultural resources were located within the Project Site. However, the Tribe did raise a concern, based on information in its possession, that the Project could potentially impact tribal cultural resources. Therefore, the Tribe requested three mitigation measures, and the City has agreed to honor the requested mitigation measures. The requested mitigation measures are included herein. After acting in good faith and after reasonable effort, the City has concluded that mutual agreement has been reached. As such, consultation has been deemed concluded. The other Native American groups contacted by the City have not responded. Consultation was officially closed on December 17.

TABLE B-26
SUMMARY OF AB 52 CONSULTATION

Contact	Tribe/Organization	Date AB 52 Notice Sent	Response Received	AB 52 Initiation Sent	Consultation Results
Kimia Fatehi, Director, Public Relations	Fernandeño Tataviam Band of Mission Indians	7/14/2017	Request consultation	Via email 8/2/2017	Consultation concluded on 12/17/2019
Andrew Salas, Chairperson	Gabrieleño Band of Mission Indians – Kizh Nation	7/14/2017	No response	-	-
Robert F. Dorame, Tribal Chair/Cultural Resources	Gabrielino Tongva Indians of California Tribal Council	7/14/2017	No response	-	-
Sam Dunlap, Cultural Resources Director	Gabrielino/Tongva Nation	7/14/2017	No response	-	-
Sandonne Goad, Chairperson	Gabrielino/Tongva Nation	7/14/2017	No response	-	-
Anthony Morales, Chairperson	Gabrielino/Tongva San Gabriel Band of Mission Indians	7/14/2017	No response	-	-
Charles Alvarez, Co-Chairperson	Gabrielino-Tongva Tribe	7/14/2017	No response	-	-
John Valenzuela, Chairperson	San Fernando Band of Band of Mission Indian	7/14/2017	No response	-	-
Joseph Ontiveros, Cultural Resource Director	Soboba Band of Luiseño Indians	7/14/2017	No response	-	-
Michael Mirelez, Cultural Resource Coordinator	Torres Martinez Desert Cahuilla Indians	7/14/2017	No response	-	-

Sacred Lands File Search

The Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File that contains sites of traditional, cultural, or religious value to the Native American community. As previously discussed in Section 5(b), above, a Sacred Lands File search conducted by the NAHC indicated that no known Native American cultural resources are located within the Project Site, although it noted that the absence of specific site information does not indicate the absence of Native American cultural resources in any project site. (Cultural Resources Assessment, p. 29)

WC2035 Plan FEIR Mitigation Measures

As this issue was not evaluated in the WC2035 Plan FEIR, there are no applicable mitigation measures in the WC2035 Plan FEIR.

Project Impacts

The evaluation of potential impacts on tribal cultural resources consists of two parts: (1) identification of tribal cultural resources within the project site or immediate vicinity through AB 52 consultation and the review of pertinent records and literature, and (2) a determination of whether the project may result in a "substantial adverse change" in the significance of any identified resources. In accordance with Appendix G, the Project would have a significant impact related to Cultural Resources if it would:

(a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

Less Than Significant Impact with Mitigation Incorporated. As previously discussed, the City sent notification letters on July 14, 2017 to the California Native American Tribes that had previously requested inclusion on the City's AB 52 notification list. As of April 2018, the City had received only one response to these notification letters, from Kimia Fatehi, Director of Public Relations for the Fernandeno Tataviam Band of Mission Indians. Ms. Fatehi initiated AB 52 consultation in response to the City's notification and engaged in consultation with the City by email correspondence and a phone call on December 12, 2019 with Jairo Avila, Tribal Historic and Cultural Preservation Officer. As previously discussed, the Tribe has raised a concern that the Project could potentially impact tribal cultural resources. The Tribe has recommended three mitigation measures to ensure that the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, and the City has agreed to honor that request. The requested mitigation measure is included below. After acting in good faith and after reasonable effort, the City has concluded that mutual agreement has been reached. As such, consultation has

been deemed concluded. The other Native American groups contacted by the City did not respond. Consultation was officially closed on December 17.

A Sacred Lands File search conducted by the NAHC indicated that no known Native American cultural resources are located within the Project Site. It noted that the absence of specific site information does not indicate the absence of Native American cultural resources in any project site. (Cultural Resources Assessment, p. 29)

As previously discussed in Section 5 of this Tiered IS, a site-specific cultural resources assessment (Cultural Resources Assessment) was conducted to assess the potential for project-related impacts on onsite and offsite historic resources. As a result of the archival research and archaeological and historic resources survey conducted for the Project, no historic, prehistoric archaeological, or historic archaeological resources have been identified within or immediately adjacent to the Project Site. However, as determined by the consultation with the Fernandeno Tataviam Band of Mission Indians, the City, as the Lead Agency, has honored the request for the addition of mitigation measures as proposed below. With implementation of these recommended mitigation measures, impacts would be less than significant, and the Project would not cause a substantial adverse change in the significance of a tribal cultural resource (as defined in PRC Section 21074) that is listed or eligible for listing in the California Register or a local register of historic resources.

(b) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact with Mitigation Incorporated. As previously discussed, the City sent notification letters on July 14, 2017 to the California Native American Tribes that had previously requested inclusion on the City's AB 52 notification list. As of April 2018, the City had received only one response to these notification letters, from Kimia Fatehi, Director of Public Relations for the Fernandeno Tataviam Band of Mission Indians. Ms. Fatehi initiated AB 52 consultation in response to the City's notification and engaged in consultation with the City by email correspondence and a phone call on December 12, 2019 with Jairo Avila, Tribal Historic and Cultural Preservation Officer. As previously discussed, the Tribe has raised a concern that the Project could potentially impact tribal cultural resources. The Tribe has recommended three mitigation measures to ensure that the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, and the City has agreed to honor that request. The requested mitigation measure is included below. After acting in good faith and after reasonable

effort, the City has concluded that mutual agreement has been reached. As such, consultation has been deemed concluded. The other Native American groups contacted by the City did not respond. Consultation was officially closed on December 17

A Sacred Lands File search conducted by the NAHC indicated that no known Native American cultural resources are located within the Project Site. It noted that the absence of specific site information does not indicate the absence of Native American cultural resources in any project site. (Cultural Resources Assessment, p. 29)

As previously discussed in Section 5 of this Tiered IS, the Cultural Resources Assessment was conducted to assess the potential for project-related impacts on onsite and offsite historic resources. As a result of the archival research and archaeological and historic resources survey conducted for the Project, no historic, prehistoric archaeological, or historic archaeological resources have been identified within or immediately adjacent to the Project Site.

However, as determined by the consultation with the Fernandeno Tataviam Band of Mission Indians, the City, as the Lead Agency, has honored the request for the addition of mitigation measures as proposed below. With implementation of these recommended mitigation measures, impacts would be less than significant, and the Project would not cause a substantial adverse change in the significance of a tribal cultural resource (as defined in PRC Section 21074) that the lead could determine, based on substantial evidence, to be historically significant pursuant to criteria set forth in PRC Section 5024.1(c).

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following three mitigation measures, TCR-1 through TCR-3, have been recommended by the Fernandeno Tatviam Band of Mission Indians:

TCR-1: The Project Applicant shall retain a professional Native American monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe all clearing, grubbing, and grading operations up to 5-feet below the surface of native soil, unless there is evidence to suggest cultural resources extend below the specified depth.

- If cultural resources are encountered, the Native American monitor will have the authority to request ground disturbing activities cease within 60-feet of discovery to assess and document potential finds in real time.

TCR-2: The Lead Agency and/or applicant shall, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during the Project.

TCR-3: If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County coroner shall be contacted. If the human remains are determined to be Native American in

origin by the County coroner, the applicant shall immediately notify the Lead Agency, the Fernandeño Tataviam Band of Mission Indians.

With implmenetation of these mitigation measures, impacts to tribal cultural resources would be less than significant.

18. Utilities and Service Systems

Analysis in WC2035 Plan FEIR

Wastewater, Wastewater Conveyance and Stormdrains

As discussed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), the Tillman Water Reclamation Plant (TWRP) and Hyperion Treatment Plant (HTP) are identified as the wastewater treatment facilities that would serve the WC2035 Plan area. The TWRP has a design capacity of 80 million gallons per day (mgd) and providing a tertiary treatment and recycling for 26 mgd. The TWRP is an upstream plant that treats constant flows, since it has the ability to bypass flow to the HTP for treatment. The HTP is located adjacent to Santa Monica Bay, at the southwest corner of Los Angeles International Airport. The HTP has a design capacity of 450 mgd and treats an average of 362 mgd to primary and secondary treatment standards, using three levels of filtration treatment before discharging the treated wastewater five miles offshore. The remaining treatment capacity at the HPT is 88 mgd. (WC2035 Plan DEIR, p. 4.13-1)

With regard to local conveyance infrastructure, the WC2035 Plan FEIR noted that sewer lines within the WC2035 Plan area mainly consist of secondary lines (less than 16 inches in diameter), and that secondary lines run along several streets, including, De Soto Avenue and Burbank Boulevard. Outfall sewer lines within the WC2035 Plan area run along Vanowen Street. The WC2035 Plan FEIR stated that there were relatively low flows in the WC2035 Plan area, indicating that the existing sewer system might be able to accommodate future flows. (WC2035 Plan DEIR, pp. 4.13-2)

The WC2035 Plan FEIR found that the incremental implementation of the WC2035 Plan would result in an increase of approximately 6.5 mgd (although the text mistakenly stated an increase of about 7.3 mgd) in the estimated daily wastewater generation within the WC2035 Plan area. It noted that applicants for each individual development project within the WC2035 Plan would be required to coordinate with the Department of Public Works (DPW) and the Bureau of Sanitation (BOS) in order to ensure that existing and/or planned sewer conveyance and treatment facilities are capable of meeting wastewater flow capacity requirements (consistent with Mitigation Measure WC-U-1, as discussed below). It also noted that all new development projects would be required to obtain a sewer capacity clearance from the Department of Public Works at the time that a sewer connection permit application is submitted (consistent with Mitigation Measure WC-U-1, as discussed below). Therefore, for each proposed project within the WC2035 Plan area, the Department of Public Works would identify specific onsite and offsite improvements needed to ensure that impacts related to wastewater conveyance are address prior to operation. (WC2035 Plan DEIR, p. 4.13-3-4)

The WC2035 Plan FEIR stated that since specific development proposals (including location, timing, and intensity) within the WC2035 Plan area were not known at the time, it was not possible to determine if existing specific sewer conveyance facilities were capable of accommodating increases in specific lines. It anticipated that new sewer conveyance facilities would need to be constructed throughout the WC2035 Plan area to accommodate the anticipated increase in wastewater. Therefore, it determined that impacts related to wastewater conveyance capacity were considered potentially significant. Accordingly, the WC2035 Plan FEIR recommended Mitigation Measure WC-U-1, which requires that individual development projects coordinate with DPW and BOS to confirm adequate conveyance capacity at the time that a sewer connection permit application is submitted. In coordination with DPW, each applicant would also be required to identify specific onsite and offsite improvements needed to ensure that impacts related to wastewater conveyance capacity are addressed prior to issuance of plans. Implementation of the identified mitigation was concluded to reduce the impact on wastewater conveyance to a less than significant level. (WC2035 Plan DEIR, pp. 4.13-3-5).

With regard to wastewater treatment capacity, the WC2035 Plan FEIR stated that the TWRP and HTP were designed to meet Citywide population projections and anticipated to have sufficient capacity to treat the anticipated wastewater generated by implementation of the WC2035 Plan. It also stated that no additional wastewater treatment facilities or the expansion of existing facilities were anticipated, and that the impact on treatment facilities was less than significant. (WC2035 Plan DEIR, p. 4.13-4)

The WC2035 Plan FEIR also discussed that both the TWRP and HTP are regulated by law to treat wastewater consistent with the requirements and standards of the Los Angeles Regional Water Quality Control Board (LARWQCB). Some of the development projects within the WC2035 Plan area may include non-residential land uses subject to the City's Industrial Wastewater Permit Program, which would allow the City to regulate and monitor those new waste streams to ensure that it can properly treat the constituents generated by those non-residential land uses in compliance with its statutory requirements. Accordingly, it determined that implementation of the WC2035 Plan would not result in an exceedance of the LARWQCB treatment requirements and standards and, therefore, impacts related to wastewater treatment capacity would be less than significant. (WC2035 Plan DEIR, p. 4.13-4)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended the following mitigation measure, designated as WC-U-1, with respect to the potentially significant impact related to wastewater conveyance (WC2035 Plan FEIR, p. V-34) that is potentially applicable to the Project:

WC-U-1: The City shall require that the project applicant for each project within the WCRCCSP *[sic]* be required to coordinate with the Department of Public Works, Bureau of Sanitation in order to ensure that existing and/or planned sewer conveyance and treatment facilities are capable of meeting wastewater flow capacity requirements. In coordination with the Bureau of Engineering, each Applicant/Contractor shall be required to identify specific on- and off-site improvements needed to ensure that impacts

related to wastewater conveyance capacity are addressed prior to issuance of plans. Sewer capacity clearance from the Department of Public Works will be required at the time that a sewer connection permit application is submitted.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts on wastewater, and the applicable mitigation measure identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

(a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, the TWRP and the HTP, which serve the WC2035 Plan area, are regulated by law to treat wastewater consistent with the requirements and standards of the LARWQCB. It also noted that some of the development projects within the WC2035 Plan area may include non-residential land uses subject to the City's Industrial Wastewater Permit Program, which would allow the City to regulate and monitor those new waste streams to ensure that it can properly treat the constituents generated by those non-residential land uses in compliance with its statutory requirements. Accordingly, it determined that implementation of the WC2035 Plan would not result in an exceedance of the LARWQCB treatment requirements and standards and therefore, impacts related to wastewater treatment capacity would be less than significant.

This analysis is fully applicable to the Project. Wastewater generated by the Project would be conveyed to the TWRP and HTP, which are both regulated by law to treat wastewater in compliance with the LARWQCB treatment requirements. Furthermore, as indicated in the WC2035 Plan FEIR, the TWRP and HTP have sufficient treatment capacity to accept wastewater generated by the implementation of the WC2035 Plan, which includes the Project. Sanitary services during construction each phase of the Project would be provided by portable toilet facilities and all wastewater would be transported offsite for treatment and disposal by an authorized private company.

Therefore, with the implementation of Mitigation WC-U-1, the Project would not exceed wastewater treatment requirements of the LARWQCB and the impact would be less than significant. This impact was adequately addressed in the WC2035 Plan FEIR.

(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?

(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?

Less Than Significant Impact with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR, and consistent with Mitigation Measure WC-U-1, individual development projects within the WC2035 Plan area would be required to coordinate with DPW and BOS, in order to ensure that existing and/or planned sewer and wastewater conveyance and treatment facilities are capable of meeting wastewater flow requirements. Furthermore, all new development projects in the City are required to obtain sewer capacity clearance from DPW at the time a sewer connection permit application is submitted. DPW identifies specific onsite and offsite improvements needed to ensure that impacts related to wastewater conveyance are addressed prior to operation, for all projects in the WC2035 Plan area (which includes the Project Site). (WC2035 Plan DEIR, pp. 4.13-3)

The WC2035 Plan FEIR concluded that buildout of the WC2035 Plan would require the construction of new sewer conveyance facilities throughout the WC2035 Plan area to accommodate the anticipated increase in wastewater. However, this potentially significant impact was considered to be less than significant with the implementation of Mitigation Measure WC-U-1. As set forth in the WC2035 Plan FEIR, the TWRP and HTP are both designed to meet City population and growth projections, including the WC2035 Plan area, and they are anticipated to have sufficient capacity to treat the anticipated wastewater to be generated by growth within the WC2035 Plan area. No additional wastewater treatment facilities or the expansion of existing facilities were anticipated to be required. Therefore, there is currently adequate wastewater treatment capacity to serve the WC2035 Plan area, and this impact is considered to be less than significant and adequately evaluated in the WC2035 Plan FEIR. (WC2035 Plan DEIR, pp. 4.13-3-5)

For informational purposes, and in order to confirm that the Project would not have a significant impact on wastewater conveyance capacity, Psomas, the project engineer, prepared a wastewater study for the Project, titled Wastewater and Water Supply Utilities Technical Memorandum, dated December 8, 2017 (Wastewater/Water Supply Report), included as Appendix M to this Tiered IS.[116] With regard to project operation, the Wastewater/Water Supply Report determined that the Project is not expected to significantly impact the existing sewer system, and the quantitative analysis for sewer generation is considered conservative. It confirmed that, in conformance with Mitigation Measure WC-U-1, the Applicant has coordinated with BOS to review and approve the Project's proposed wastewater flows. BOS approved a Sewer Capacity Availability Request

[116] Subsequent to the issuance of the SCAR, the Project was slightly refined by the Applicant. As originally analyzed, the Project included 1,029 residential dwelling units. However, the residential component of Building 3 has been reduced by 20 units (from 254 to 234 units), resulting in a lower total residential unit count of 1,009. Because the SCAR analyzed a wastewater flow for the slightly larger originally proposed Project, the wastewater flow is considered to be conservative. Therefore, the SCAR fully applies to the refined Project.

(SCAR), dated March 12, 2018, for 546,470 gallons per day (gpd) of total wastewater flow for the Project. The approved SCAR conservatively includes flows for swimming pools, which are not drained or refilled daily. Therefore, the approved wastewater flow is greater than the average daily demand for wastewater discharge. Based on the SCAR, the BOS determined that there is capacity available to handle the anticipated discharge from the Project. (Wastewater/Water Supply Report, p. 6)

In addition, consistent with Mitigation Measure WC-U-1, the Wastewater/Water Supply Report indicated that the Project would likely include onsite and offsite improvements to ensure that impacts related to wastewater conveyance capacity are addressed, including multiple 8-inch sewer laterals to connect to main lines in Burbank Boulevard, De Soto Avenue, and a new 12-inch sewer main in Warner Center Lane. (Wastewater/Water Supply Report, p. 5)

The Wastewater/Water Supply Report also determined that Project construction would result in a temporary increase in wastewater generation during each Project phase as a result of onsite construction work and the presence of construction workers. However, such generation would be nominal in comparison to the operational wastewater that would be generated by the Project. Furthermore, construction workers would typically utilize portable restrooms, which would not contribute waste flows to the local wastewater system. Wastewater facilities currently serving the Project Site have the capacity to convey any increases in wastewater flows generated during project construction. Therefore, the Wastewater and Water Supply Report concluded that Project construction impacts on the wastewater system would be less than significant. (Wastewater/Water Supply Report, p. 6)

For these reasons, with implementation of Mitigation Measure WC-U-1, (1) the Project would not 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, and (2) the Project would 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. Therefore, the Project would have a less than significant impact on wastewater conveyance capacity, and this impact was adequately addressed in the WC2035 Plan FEIR, as confirmed in the Wastewater/Water Supply Report.

(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?

Less Than Significant Impact with Mitigation Incorporated. As discussed in Section 9(d), above, of this Tiered IS, in conformance with the WC2035 Plan FEIR, a project-specific hydrology and drainage study was prepared for the Project (Hydrology Report) to determine the anticipated flows to existing onsite and offsite storm drain facilities and whether those flows could be accommodated by existing stormwater facilities. The Hydrology Report demonstrated that stormwater flows associated with the Project would be reduced by 4 percent to 9 percent in comparison to existing stormwater flows at a common tributary point in the RCB storm drain at the north property line. In addition, the Project's storm flows would be further reduced through

compliance with the City's LID requirements, which includes the installation of cisterns, planter drains, and roof downspouts through the Project Site to collect roof and site runoff, and direct stormwater to the LID system through a series of underground storm drain pipes. cisterns would have the capacity to retain and treat an 85th percentile 24-hour rainfall depth of 1.03 inches. As such, the detention system could detain a rainfall intensity of 0.5 inch per hour for up to 2 hours. This satisfies the 0.5 inch per hour retention rate recommended in the WC2035 Plan FEIR. With the implementation of the stormwater capture and reuse system (i.e., harvesting system for onsite irrigation use), the volume of water leaving the Project Site would be reduced from existing flows. (Hydrology Report, pp. 4-5, 8-9)

The Hydrology Report concludes that the Project would not incrementally impact the risk of flooding either onsite or offsite during a 50-year storm event, would not substantially increase the amount of surface water in a water body, and would not result in a permanent adverse change to the movement of surface water that would result in an incremental effect on the capacity of the existing storm drain system that serves the Project Site. (Hydrology Report, p. 11)

For these reasons, the Project would not require or result in the construction of new stormwater drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, the Project's impacts to stormwater drainage facilities would be less than significant.

Summary of Recommended Project Mitigation Measure

Based on the foregoing analysis, the following mitigation measures from the WC2035 Plan FEIR is recommended to mitigate the Project's potentially significant impact on wastewater to a less than significant level (this mitigation measure has been non-substantively modified to apply specifically to the Project):

U-1: The Applicant shall be required to coordinate with the Department of Public Works, Bureau of Sanitation in order to ensure that existing and/or planned sewer conveyance and treatment facilities are capable of meeting wastewater flow capacity requirements. In coordination with the Bureau of Engineering, the Applicant shall be required to identify specific on- and off-site improvements needed to ensure that impacts related to wastewater conveyance capacity are addressed prior to issuance of plans for each phase of construction. Sewer capacity clearance from the Department of Public Works will be required at the time that a sewer connection permit application is submitted for a construction phase.

Analysis in WC2035 Plan FEIR

Water Supply

The WC2035 Plan FEIR stated that minor amounts of water would be required during project construction for dust suppression, but this would not result in a significant impact on water supplies and, as such, it concluded that construction impacts related to water supply would be less than significant (WC2035 Plan DEIR, p. 4.13-17).

With respect to operational water supply, the WC2035 Plan FEIR determined that incremental implementation of the WC2035 Plan would result in increased demand for water related to the operation/occupancy of new development. The WC2035 Plan FEIR calculated estimated water demand assuming buildout under the WC2035 Plan area to the maximum allowable density under the WC2035 Plan, employing conservative (i.e., higher than anticipated) water consumption rates. It stated that the full buildout under the WC2035 Plan could result in an increased demand of water of up to approximately 7.9 million gallons per day, although the WC2035 Plan FEIR acknowledged that this number is anticipated to be substantially less with implementation of the mitigation measures in the WC2035 Plan FEIR that include a broad range of water conservation measures, including WC-U-4, WC-U-5, WC-U-6, WC-U-7, WC-U-8, WC-U-10 and WC-U-11, as further discussed below. (WC2035 Plan DEIR, p. 4.13-18, WC2035 Plan FEIR, pp. V-34-36)

Mitigation Measure WC-U-4 requires several conservation measures in new development, including installation of high-efficiency toilets and urinals, limitations on faucet and showerhead flow rates, high efficiency clothes washers and dishwashers, and installation of onsite water recycling, as feasible. Mitigation Measure WC-U-5 requires that project applicants consult with the Los Angeles Department of Water and Power (LADWP) to identify feasible and reasonable measures to reduce water consumption prior to issuance of a building permit. Mitigation Measure WC-U-6 requires that each development project incorporate Phase I of the City's Emergency Water Conservation Plan including prohibiting hose watering of driveways and associated walkways. Mitigation Measure WC-U-7 requires that individual projects comply with any additional mandatory water use restrictions imposed as a result of drought conditions. Mitigation Measure WC-U-8 requires the installation automatic sprinkler systems to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation.

Mitigation Measure WC-U-10 requires that development projects remain within the Citywide water budgets established by LADWP, so that individual projects may be required to provide for new water supply through a combination of water conservation (on and potentially offsite) and recycled water, such that the net increase in water demand (not including demand for recycled water) from Warner Center does not exceed the calculated demand anticipated for the City and/or Warner Center as appropriate and as documented in the City's most recent Urban Water Management Plan (UWMP). (WC2035 Plan FEIR, pp. V-34-36)

Finally, Mitigation Measure WC-U-11 requires that any pumping and discharge or disposal of groundwater is considered to be a consumptive use. Such activity shall be reported to the Watermaster and LADWP shall be compensated for any loss of groundwater. The mitigation measure requires that reasonable efforts be made by project applicants to beneficially use any extracted groundwater (e.g., cooling or irrigation). (WC2035 Plan FEIR, pp. V-34, 36)

The WC2035 Plan FEIR also noted that the Urban Design Guidelines in the WC2035 Plan would require the use of native and/or drought tolerant landscaping for development projects. They also identify installing high-efficiency "smart" irrigation systems, which include a weather-based controller and, where feasible, in-line drip and bubblers, rather than overhead spray to be

implemented. These measures would further reduce overall water demand within the WC2035 Plan area. (WC2035 Plan DEIR, p. 4.13-19)

The WC2035 Plan FEIR further discussed that the 2005 UWMP anticipated adequate water supplies would be available to the service areas under normal, single-dry, and multi-dry year conditions through 2030. The 2010 UWMP was in preparation at the time the WC2035 Plan FEIR was prepared; however, the WC2035 Plan FEIR anticipated that it would show adequate water supplies through 2035 assuming City growth remained consistent with Southern California Association of Governments (SCAG) projections. It anticipated that City growth remained consistent with SCAG projections, although some redistribution of growth within the City was anticipated compared to past growth forecasts. Warner Center, because of its proximity to transit, designation as a center and mix of uses, was anticipated to be denser than anticipated in the past, but other areas of the City would not grow as much as previous forecasts have indicated. (WC2035 Plan DEIR, p. 4.13-18)

The WC2035 Plan FEIR also noted that the preparation of a water supply assessment (WSA) would be required for individual projects of sufficient size in accordance with State law. It determined that, for projects that did not require preparation of a WSA, the 2010 UWMP concluded that sufficient water supply would be available for the LADWP service area through the 2035 planning horizon. Accordingly, the WC2035 Plan FEIR concluded that the implementation of the WC2035 Plan would not have a significant impact related to insufficient water supplies and was not anticipated to necessitate the expansion or construction of a new water treatment facility. (WC2035 Plan DEIR, p. 4.13-18, WC2035 Plan FEIR, p. 4-13)

With respect to water conveyance infrastructure, the WC2035 Plan FEIR noted that, as in other areas of the City, all new development within the WC2035 Plan area would require appropriate clearance from LADWP to ensure that existing and/or planned water conveyance facilities are capable of meeting consumption and pressure flow requirements for each individual project. Indeed, appropriate clearance from LADWP is required for all new development in the City at the time that a water connection permit application is submitted. It also noted that coordination with LAWDP could identify specific onsite and offsite improvements needed to ensure that impacts related to water supply and pressure conveyance capacity are addressed prior to issuance of permits. The WC2035 Plan FEIR further stated, however, that because future specific development (including timing and intensity) within the WC2035 Plan area was not known, it is unclear if existing onsite or offsite water conveyance facilities would be capable of accommodating increased demand, and therefore, impacts related to water conveyance capacity would be potentially adverse and significant. (WC2035 Plan DEIR, p. 4.13-17)

Accordingly, the WC2035 Plan FEIR recommended Mitigation Measure WC-U-2, which requires that individual projects coordinate with LADWP in order to ensure that existing and/or planned water supply and water conveyance facilities are capable of meeting water demand/pressure requirements. Furthermore, in accordance with State law, a WSA is be required for projects that meet the size requirements specified in the regulations. Consistent with the discussion in the text of the WC2035 Plan FEIR, WC-U-2 further requires coordination with LADWP to identify specific

onsite and offsite improvements to ensure that impacts related to water supply and conveyance demand/pressure requirements are addressed prior to issuance of a certificate of occupancy. The WC2035 Plan FEIR conclude that, with the implementation of Mitigation WC-U-2, the implementation of the WC2035 Plan would have a less than significant impact on water conveyance infrastructure. (WC2035 Plan DEIR, pp. 4.13-17, 22, WC2035 Plan FEIR, p. V-34)

With regard to fire flow demand, the WC2035 Plan FEIR acknowledged that fire flow requirements typically dictate whether existing water infrastructure is adequate. If the existing water infrastructure is able to accommodate the fire flow demands, then the domestic water demand can also be accommodated, as fire flow demand is typically higher and more conservative than domestic water demand. Fire flow requirements are set by the City's Fire Department and Department of Building and Safety (DBS). Future development within the WC2035 Plan area would be subject to a number of conditions of approval to ensure the Fire Department and DBS requirements are met. Prior to issuance of building permits for a project, the applicant would be required to submit plans for approval to those departments to ensure the applicable water flow requirements are met. In addition, all fire water supplies for new construction would be inspected, tested and accepted as witnessed by these agencies prior to occupancy. (WC2035 Plan DEIR, p. 4.13-19)

However, the WC2035 Plan FEIR determined that because future development proposals (including location, timing, and intensity) associated with the individual projects were not known, it was not possible to determine if existing onsite or offsite fire hydrants would be capable of supplying adequate fire flows. Therefore, it concluded that impacts related to fire flow would be potentially adverse and significant. Accordingly, the WC2035 Plan FEIR recommended Mitigation Measure WC-U-3, which requires each applicant to coordinate with the Fire Department and DBS to ensure that existing and/or planned fire hydrants are capable of meeting fire flow demand/pressure requirements. It also recommended Mitigation Measure WC-U-9, which requires that prior to issuance of building permits for a project, the applicant shall pay any appropriate fees imposed by DBS, a percentage of which would be contributed to the fire hydrant fund, which provides for Citywide fire protection improvements. (WC2035 Plan DEIR, p. 4.13-19, WC2035 Plan FEIR, pp. V-34, 36)

Mitigation Measure WC-U-11 requires that any pumping and discharge or disposal of groundwater is considered to be a consumptive use. Such activity shall be reported to the Watermaster and LADWP shall be compensated for any loss of groundwater. The mitigation measure requires that reasonable efforts shall be made by individual project applicants to beneficially use an any extracted groundwater (e.g., cooling or irrigation). (WC2035 Plan FEIR, pp. V-34, 36)

The WC2035 Plan FEIR concluded that, with the implementation of Mitigation Measures WC-U-2 through WC-U-11, the impact of the WC2035 Plan on water supply, conveyance facilities and pressure requirements would be less than significant. (WC2035 Plan DEIR, p. 4.13-22)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended the following mitigation measures, designated as WC-U-2 through WC-U-11, with respect to potentially significant or less than significant impacts related to water supply, conveyance facilities and pressure requirements. The mitigation measures set forth below are potentially applicable to the Project. (WC2035 Plan FEIR, pp. V-34-36)

WC-U-2: The City shall require that each applicant coordinate with the City of Los Angeles Department of Water and Power (LADWP) in order to ensure that existing and/or planned water supply and water conveyance facilities are capable of meeting water demand/pressure requirements. (In accordance with State Law, a Water Supply Assessment shall be required for projects that meet the size requirements specified in the regulations.) In coordination with the LADWP, each applicant will identify specific on- and off-site improvements needed to ensure that impacts related to water supply and conveyance demand/pressure requirements are addressed prior to issuance of a certificate of occupancy. Water supply and conveyance demand/pressure clearance from the LADWP will be required at the time that a water connection permit application is submitted.

WC-U-3: The City shall require each applicant to coordinate with the City of Los Angeles Fire Department and Building Safety Department in order to ensure that existing and/or planned fire hydrants are capable of meeting fire flow demand/pressure requirements. The issuance of building permits will be dependent upon submission, review, approval, and testing of fire flow demand and pressure requirements, as established by the City of Los Angeles Fire Department and Building Safety Department prior to occupancy.

WC-U-4: The City shall require that each applicant implement water conservation measures in new development that shall include but not be limited to the following:

- Installation of high-efficiency toilets (1.28 gallons per flush or less, includes dual flush
- High-efficiency urinals (0.125 gallons per flush or less, includes waterless)
- Restroom faucet flow rate of 1.5 gallons per minute or less
- Public restroom faucet flow rate of 0.5 gallons per minute or less and self-closing
- Showerhead flow rate of 2.0 gallons per minute or less
- Limit of one showerhead per shower stall
- High efficiency clothes washers (water factor of 4.0 or less)
- High efficiency dishwashers (Energy Star rated)

- Domestic water heating system located in close proximity to point(s) of use, as feasible
- Use of tankless and on-demand water heaters as feasible
- Cooling towers must be operated at a minimum of 5.5 cycles of concentration
- Install on-site water recycling as feasible
- Use of recycled water (if available) for appropriate end uses (irrigation, cooling towers, sanitary)
- Single pass cooling shall be prohibited (e.g. any vacuum pumps or ice machines)
- Irrigation shall include:
  - Weather-based irrigation controller with rain shutoff
  - Flow sensor and master valve shutoff (for large landscaped areas)
  - Matched precipitation (flow) rates for sprinkler heads
  - Drip/microspray/subsurface irrigation where appropriate
  - Minimum irrigation system distribution uniformity of 75%
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
  - Use of landscape contouring to minimize precipitation runoff

WC-U-5: The City shall require that prior to the issuance of a building permit, each applicant shall consult with LADWP to identify feasible and reasonable measures to reduce water consumption, including, but not limited to, systems to use reclaimed water for landscaping (should reclaimed water become available in Warner Center), drip irrigation, re-circulating hot water systems, water conserving landscape techniques (such as mulching, installation of drip irrigation systems, landscape design to group plants of similar water demand, soil moisture sensors, automatic irrigation systems, clustered landscaped areas to maximize the efficiency of the irrigation system), water conserving kitchen and bathroom fixtures and appliances, thermostatically controlled mixing valves for baths and showers, and insulated hot water lines, as per City adopted UBC requirements.

WC-U-6: The City shall require that each project incorporate Phase I of the City of Los Angeles Emergency Water Conservation Plan including prohibiting hose watering of driveways and associated walkways; requiring decorative fountains to use recycled water, and repairing water leaks in a timely manner.

WC-U-7: The City shall require that each project comply with any additional mandatory water use restrictions imposed as a result of drought conditions.

WC-U-8: The City shall require automatic sprinkler systems to be installed to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season, so that water is not wasted in excessive landscape irrigation.

WC-U-9: Prior to issuance of building permits, applicants shall pay any appropriate fees imposed by the Building and Safety Department. A percentage of building permit fees is contributed to the fire hydrant fund, which provides for Citywide fire protection improvements.

WC-U-10: Development within Warner Center must remain within Citywide water budgets established by LADWP. As required by LADWP projects may be required to provide for new water supply through a combination of water conservation (on and potentially off-site) and recycled water, such that the net increase in water demand (not including demand for recycled water) from Warner Center does not exceed the calculated demand anticipated for the City and/or Warner Center as appropriate and as documented in the City's most recent Urban Water Management Plan.

WC-U-11: Any pumping and discharge or disposal of groundwater is considered to be a consumptive use. The City requires that any pumping of groundwater be reported to the Watermaster and LADWP shall be compensated for any loss of groundwater. In addition, reasonable efforts shall be used by project applicants to beneficially use any extracted groundwater (for example cooling or irrigation).

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts on water supply, conveyance facilities and pressure requirements and applicable mitigation measures identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

(d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), minor amounts of water would be required for dust suppression purposes during construction of development projects within the WC2035 Plan area (which includes the Project Site). (WC2035 Plan DEIR, p. 4.13-17) This analysis is fully applicable to the Project. Therefore, the Project's construction related impact on water supplies would be less than significant.

With respect to potential operational impacts related to the implementation of the WC2035 Plan, the WC2035 Plan FEIR concluded that the planned land uses identified for the WC2035 Plan area would be built incrementally, with buildout anticipated to occur by 2035. Implementation of the

WC2035 Plan could result in an increased demand of up to approximately 7.9 million GPD. However, with the incorporation of the water conservation measures required Mitigation Measures WC-U-4, WC-U-5, WC-U-6, WC-U-7, WC-U-8, WC-U-10 and WC-U-11, as well as the water conservation measures set forth in the Urban Design Guidelines in the WC2035 Plan, this amount is anticipated to be substantially less. Furthermore, individual development projects would be subject to review by LADWP, and the preparation of a WSA would be required for projects of sufficient size, consistent with Mitigation Measure WC-U-2. For these reasons, the WC2035 Plan FEIR concluded that the WC2035 Plan's impact on water supply would be reduced to a less than significant level. (WC2035 Plan DEIR, pp. 4.13-18, 22)

This analysis is fully applicable to the Project. In conformance with Mitigation Measure WC-U-2 and State law, the Applicant requested the preparation of a WSA from LADWP (Project WSA), included as Appendix N to this Tiered IS, which was approved by the LADWP Board of Water and Power Commissioners on September 26, 2017 by Resolution No. 018064.[117]

As discussed in the Project WSA, the basis for approving WSAs for development projects is in LADWP's most recently adopted UWMP. LADWP's most recent water demand forecast, which is contained in the 2015 UWMP, uses long-term demographic projections for population, housing and employment. The California Urban Water Management Planning Act requires water suppliers to develop an UWMP every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry and multiple-dry years. If the project water demand associated with the Project was not accounted for in the most recently adopted UWMP, the WSA must include a discussion with regard to whether LADWP's total projected water supplies available during normal, single-dry, and multiple-dry years during a 20-year projection will meet the projected water demand associated with the Project, in addition to LADWP's existing and planned future uses. (Project WSA, p. 5)

The City's water demand projection in LADWP's 2015 UWMP was developed based on the 2012 Regional Transportation Plan (RTP) demographic projection by the Southern California Association of Governments (SCAG) using the 2010 United States (U.S.) Census for the City. LADWP's 2015 UWMP concluded there are adequate water supplies to meet projected water demands through 2040, and projected a seven percent lower water demand trend than what was projected in the previous LADWP 2010 UWMP. Therefore, the City's water supply projections in LADWP's 2015 UWMP are sufficient to meet the City's water demand projections based on the 2012 RTP. (Project WSA, pp. 5, 11-13)

The Planning Department determined that the Project conforms with the use and intensity of development permitted by the City's General Plan, and that it is consistent with the demographic projections for the City from both the 2012 and 2016 RTPs. Therefore, anticipated water demand for the Project falls within the 2015 UWMP's projected water supplies for normal, single-dry and

[117] Subsequent to the issuance of the WSA, the Project was slightly refined by the Applicant. As originally analyzed, the Project included 1,029 residential dwelling units. However, the proposed residential component of Building 3 has been reduced by 20 units (from 254 to 234 units), resulting in a lower total residential unit count of 1,009. Because the WSA analyzed a water demand for the slightly larger originally proposed Project, the water demand is considered to be conservative. Therefore, the WSA fully applies to the refined Project.

multiple-dry years through the year 2040 and is also within the 2015 UWMP's 25-year water demand growth projections. The WSA for the Project was approved based on the fact that the Project's water demand falls within the 2015 UWMP's projected increase in Citywide water demands, which anticipating multi-dry year water supply conditions occurring at the same time. In addition, the 2015 UWMP contains a water shortage contingency plan for multi-year dry hydrologic periods. This water shortage contingency plan was implemented on June 1, 2009, when the LADWP Board of Water and Power Commissioners adopted Shortage Year Rates, and the City Council implemented the landscape irrigation and prohibited use restrictions contained in the City's Water Conservation Ordinance. (Project WSA, p. 5)

In the Project WSA, LADWP determined that the total net additional water demand for the Project would be 486 acre-feet per year (AFY). (Project WSA, pp. 4, 7-10, 48). It therefore concluded that this additional water demand could be accommodated because LADWP has sufficient water supplies available to serve the Project from existing entitlements and resources. The net additional water demand of 486 AFY factored in savings of approximately 135 AFY through implementation of water conservation ordinances and a further reduction of approximately 6 AFY through additional voluntary conservation measures offered by the Applicant, as discussed below. (Project WSA, pp. 1, 7-10, 48)

LADWP determined that the total net additional water demand for the Project is 486 acre-feet per year (AFY), and it concluded that this additional water demand can be accommodated, as LADWP has sufficient water supplies available to serve the Project from existing entitlements and resources. The estimated water demand was anticipated to decrease by 135 AFY through implementation of the conservation ordinance and code requirements, and it would be reduced by another 6 AFY through additional voluntary conservation measures offered by the Applicant, as discussed below. (Project WSA, pp. 1, 7-10, 48)

LADWP further concluded in the Project WSA that the additional water demand generated by the Project has been accounted for in the City's overall demand projections using a service area-wide approach that does not rely on individual development amounts. LADWP forecasts adequate water supplies to meet all projected water demands in the City through 2040. As such, LADWP concluded that the 486 AFY net increase in water demand resulting from project implementation falls within the available projected water supplies for normal, single-dry and multiple-dry years through 2040. LADWP found that it would be able to meet the water demands of the Project, as well as existing and planned future water demands within its service area. (Project WSA, pp. 1, 4-5, 48)

The Project would be subject to water conservation measures specified in Mitigation Measure WC-U-4 and other conservation measures that may be required by LADWP and the City as set forth in Mitigation Measures WC-U-5, WC-U-6, WC-U-7, WC-U-8, WC-U-10 and WC-U-11. Consistent with Mitigation Measures WC-U-5 and WC-U-10, and as stated in the Project WSA, the Applicant has voluntarily committed to implement several addition conservation measures, which include the following: waterless urinals in all commercial uses; dual-flush toilets with flush volumes of 0.9 gallons per flush and 1.28 gallons per flush; proper hydro-zoning/zoned irrigation (group plants with similar water requirements together); drip irrigation for all hydrozones, except turf. As

discussed, these additional measures, some of which exceed the water conservation requirements in the WSA, would reduce water consumption by approximately 6 AFY. (Project WSA, pp. 1, 4, 9, 13-14)

Therefore, consistent with the WC2035 Plan FEIR, the Project WSA has confirmed that, based on the water demand associated with the Project and information and analysis in the 2015 UWMP, and with the implementation of Mitigation Measures WC-U-2 through WC-U-11, including the additional water conservation measures identified in the Project consistent with WC-U-5, the Project would have sufficient water supplies available from existing entitlements and resources, and no new or expanded entitlements would be needed.

Finally, with regard to fire flow demand, the WC2035 Plan FEIR determined that because future development proposals (including location, timing, and intensity) associated with the individual projects were not known, it was not possible to determine if existing onsite or offsite fire hydrants would be capable of supplying adequate fire flows. Therefore, it concluded that impacts related to fire flow would be potentially adverse and significant. Accordingly, the WC2035 Plan FEIR recommended Mitigation Measure WC-U-3, which requires each project applicant to coordinate with the Fire Department and DBS to ensure that existing and/or planned fire hydrants are capable of meeting fire flow demand/pressure requirements. It also recommended Mitigation Measure WC-U-9, which requires that prior to issuance of building permits for a project, the applicant shall pay any appropriate fees imposed by DBS, a percentage of which would be contributed to the fire hydrant fund, which provides for Citywide fire protection improvements. (WC2035 Plan DEIR, p. 4.13-19, WC2035 Plan FEIR, pp. V-34, 36)

Consistent with Mitigation Measure WC-U-3, the Wastewater/Water Support Report was prepared for the Project and states that, for a site of this magnitude, a fire flow between 6,000 to 9,000 gallons per minute is required, or a maximum of 12,960,000 gallons per day. Psomas, the Applicant's civil engineer, met with Inspector Dallas of the Los Angeles Fire Department, Hydrants and Access Section, to discuss the hydrant coverage for the Project. Upon review of the existing water services, Inspector Dallas concluded that the current hydrant locations and coverage are adequate, and that no additional public or private fire hydrants would be necessary for the Project. In addition, the Project would comply with Mitigation Measure WC-U-9, if applicable. (Wastewater/Water Supply Report, p. 7)

The Wastewater/Water Supply Report also confirmed that the Service Advisory Requests (SAR) were provided by LADWP to determine water pressure and flow capacity for the existing water lines. The water pressures range between 87-46 pounds per square inch (PSI), depending on the street. The SARs for Burbank Boulevard, De Soto Avenue and Warner Center Lane confirmed that the pressure is generally low for a development of this size and, therefore, a pump is proposed to provide adequate fire flow pressure inside the New Buildings. Fire water line connections for the Project would be installed by LADWP, and would be made from the 12-inch main lines in Warner Center Lane, Burbank Boulevard and De Soto Avenue. With the inclusion of this fire flow infrastructure, the Project's impact on fire flow demand would be less than significant. (Wastewater/Water Supply Report, pp. 7-8)

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following ten mitigation measures from the WC2035 Plan FEIR are recommended to mitigate the Project's potentially significant impact on water supply (these mitigation measures have been non-substantively modified to apply specifically to the Project):

U-2: The Applicant shall coordinate with the City of Los Angeles Department of Water and Power (LADWP) in order to ensure that existing and/or planned water supply and water conveyance facilities are capable of meeting water demand/pressure requirements. In coordination with the LADWP, the Applicant will identify, with respect to each phase of the Project, specific onsite and offsite improvements needed to ensure that impacts related to water supply and conveyance demand/pressure requirements are addressed prior to issuance of a certificate of occupancy for the applicable project phase. Water supply and conveyance demand/pressure clearance from the LADWP will be required at the time that a water connection permit application is submitted for the applicable phase of the Project.

U-3: The Applicant shall coordinate with the City of Los Angeles Fire Department and Building Safety Department in order to ensure that existing and/or planned fire hydrants are capable of meeting fire flow demand/pressure requirements. The issuance of building permits for each phase of the Project will be dependent upon submission, review, approval, and testing of fire flow demand and pressure requirements, as established by the City of Los Angeles Fire Department and Building Safety Department prior to occupancy of the applicable Project phase.

U-4: The Applicant shall implement water conservation measures in new development that shall include, but not be limited to, the following:

- Installation of high-efficiency toilets (1.28 gallons per flush or less, includes dual flush
- High-efficiency urinals (0.125 gallons per flush or less, includes waterless)
- Restroom faucet flow rate of 1.5 gallons per minute or less
- Public restroom faucet flow rate of 0.5 gallons per minute or less and self-closing
- Showerhead flow rate of 2.0 gallons per minute or less
- Limit of one showerhead per shower stall
- High efficiency clothes washers (water factor of 4.0 or less)
- High efficiency dishwashers (Energy Star rated)
- Domestic water heating system located in close proximity to point(s) of use, as feasible

- Use of tankless and on-demand water heaters as feasible
- Cooling towers must be operated at a minimum of 5.5 cycles of concentration
- Install on-site water recycling as feasible
- Use of recycled water (if available) for appropriate end uses (irrigation, cooling towers, sanitary)
- Single pass cooling shall be prohibited (e.g. any vacuum pumps or ice machines)
- Irrigation shall include:
  - Weather-based irrigation controller with rain shutoff
  - Flow sensor and master valve shutoff (for large landscaped areas)
  - Matched precipitation (flow) rates for sprinkler heads
  - Drip/microspray/subsurface irrigation where appropriate
  - Minimum irrigation system distribution uniformity of 75%
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials
  - Use of landscape contouring to minimize precipitation runoff

U-5: With respect to each phase of the Project, prior to the issuance of a building permit, the Applicant shall consult with LADWP to identify feasible and reasonable measures to reduce water consumption, including, but not limited to, systems to use reclaimed water for landscaping (should reclaimed water become available in Warner Center), drip irrigation, re-circulating hot water systems, water conserving landscape techniques (such as mulching, installation of drip irrigation systems, landscape design to group plants of similar water demand, soil moisture sensors, automatic irrigation systems, clustered landscaped areas to maximize the efficiency of the irrigation system), water conserving kitchen and bathroom fixtures and appliances, thermostatically controlled mixing valves for baths and showers, and insulated hot water lines, as per City adopted UBC requirements.

U-6: The Applicant shall comply with Phase I of the City of Los Angeles Emergency Water Conservation Plan including prohibiting hose watering of driveways and associated walkways; requiring decorative fountains to use recycled water, and repairing water leaks in a timely manner.

U-7: The Applicant shall comply with any additional mandatory water use restrictions imposed as a result of drought conditions.

U-8: The Applicant shall ensure that automatic sprinkler systems will be installed to irrigate landscaping during morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset

to water less often in cooler months and during the rainfall season, so that water is not wasted in excessive landscape irrigation.

U-9: With respect to each phase of the Project, prior to issuance of building permits, the Applicant shall pay any appropriate fees imposed by the Department of Building and Safety. A percentage of any such building permit fees will be contributed to the fire hydrant fund, which provides for Citywide fire protection improvements.

U-10: The Project shall remain within Citywide water budgets established by LADWP. As required by LADWP, the Project may be required to provide for new water supply through a combination of water conservation (onsite and potentially offsite) and recycled water, such that the net increase in water demand (not including demand for recycled water) from Warner Center does not exceed the calculated demand anticipated for the City and/or Warner Center as appropriate and as documented in the City's most recent Urban Water Management Plan.

U-11: Any pumping and discharge or disposal of groundwater is considered to be a consumptive use. The Applicant shall report any pumping of groundwater to the Watermaster and LADWP shall be compensated for any loss of groundwater. In addition, reasonable efforts by the Applicant shall be made to beneficially use any extracted groundwater (for example cooling or irrigation).

Analysis in WC2035 Plan FEIR

Solid Waste

As discussed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), several of the County's unclassified landfills were identified as only accepting construction and demolition waste generated within a landfill's particular jurisdiction. The Sunshine Canyon Landfill has been identified as the landfill most likely to receive solid waste from the WC2035 Plan area. The 2008 remaining disposal capacity for the County's unclassified landfills open to the City was estimated at 56.965 million tons. The WC2035 Plan FEIR recognized that the City achieved a 65 percent diversion rate of solid waste from landfills in 2008, exceeding the required 50 percent diversion rate required by AB 939. (WC2035 Plan DEIR, pp. 4.13-25-26)

With regard to construction, the WC2035 Plan FEIR recognized that development within the WC2035 Plan area would generate construction and demolition waste, including, but not limited to, soil, wood, asphalt, concrete, paper, glass, plastic, metals, and cardboard that would be disposed of in landfills serving the WC2035 Plan area. However, given the unknown specifics of the individual development projects, it was not possible to estimate the construction-related solid waste. The WC2035 Plan FEIR stated that that individual projects would be subject to City solid waste diversion measures including the recycling of building materials similar requirements (as required by Mitigation Measure WC-U-12, as further described below). It concluded that, with the implementation of Mitigation Measure WC-U-12, the WC2035 Plan's impact on solid waste would be less than significant. (WC2035 Plan DEIR, pp. 4.13-32, 34)

With regard to the operational solid waste impact, buildout under the WC2035 Plan was estimated to result in a net increase in solid waste generation of 149,000 pounds (74.5 tons) per day by 2035. This was found to represent about 0.6 percent of the permitted daily capacity of the Sunshine Canyon Landfill, or about 1.5 percent of the remaining landfill's daily capacity. Therefore, the WC2035 Plan FEIR determined that the available capacity of the existing and/or planned landfills would not be exceeded, and impacts on solid waste from implementation of the WC2035 Plan would be less than significant. It also determined that although Sunshine Canyon is anticipated to close in 2037, it was anticipated that additional capacity would exist at this or other facilities, sufficient to accommodate the implementation of the WC2035 Plan. It also noted that individual projects would be subject to City solid waste diversion measures, which would reduce the anticipated overall waste stream to area landfills. (WC2035 Plan DEIR, p. 4.13-33)

Notwithstanding that the WC2035 Plan FEIR determined that the impact on solid waste generation would be less than significant, it recommended Mitigation Measure WC-U-12, presumably to ensure that the solid waste impact associated with individual projects would be less than significant. Mitigation Measure WC-U-12 requires that each development project include the recycling and/or salvage at least 75 percent of non-hazardous construction and demolition debris, and that each applicant prepare a construction waste management plan. The construction waste management plan is required, at a minimum, to identify the materials to be diverted from disposal and whether the materials will be sorted onsite or comingled. Individual projects would also be required to comply with the City's standard requirement that all proposed residential developments of four or more units or where the addition of floor area is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more, are required to include a recycling area or room for onsite recycling activities. (WC2035 Plan DEIR, p. 4.13-33, WC2035 Plan FEIR, p. V-36)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan FEIR recommended the following mitigation measure, designated as WC-U-12, to reduce a less than significant impact on solid waste (WC2035 Plan FEIR, p. V-36) that is potentially applicable to the Project:

WC-U-12: The City shall require that each project recycle and/or salvage at least 75% of non-hazardous construction and demolition debris, and that each applicant prepare a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or comingled shall be developed and implemented. Excavated soil and land-clearing debris do not contribute to the amount of recycled/salvaged debris. Calculations can be done by weight or volume, but must be consistent throughout. Projects in Warner Center will be required to comply with the City's standard requirement that, all proposed residential developments of four or more units or where the addition of floor areas is 25% or more, and all other development projects where the addition of floor area is 30% or more, are required to set aside a recycling area or room for on-site recycling activities.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts on solid waste and applicable mitigation measure identified in the Mitigation Monitoring Program for the WC2035 Plan, which is set forth in the WC2035 Plan FEIR, are discussed below.

(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?

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, construction of development projects in the WC2035 Plan area (which includes the Project Site) would require earthwork, demolition of existing buildings, as well as construction of new structures. These construction activities would generate demolition waste that would be disposed of in landfills serving the WC2035 Plan area. Development would occur incrementally through 2035, and individual projects would be subject to the City's solid waste diversion measures, including the recycling of building materials, consistent with Mitigation Measure WC-U-12. It concluded that, with the implementation of Mitigation Measure WC-U-12, the WC2035 Plan's construction-related impact on solid waste would be less than significant. (WC2035 Plan DEIR, p. 4.13-32, 34)

With regard to construction, the WC2035 Plan FEIR recognized that development within the WC2035 Plan area would generate construction and demolition waste, including, but not limited to, soil, wood, asphalt, concrete, paper, glass, plastic, metals, and cardboard that would be disposed of in landfills serving the WC2035 Plan area. However, given the unknown specifics of the individual development projects, it was not possible to estimate the construction-related solid waste. The WC2035 Plan FEIR stated that that individual projects would be subject to City solid waste diversion measures including the recycling of building materials similar requirements (as required by Mitigation Measure WC-U-12, as further described below). It concluded that, with the implementation of Mitigation Measure WC-U-12, the WC2035 Plan's impact on solid waste would be less than significant. (WC2035 Plan DEIR, pp. 4.13-32, 34)

With respect to the operational solid waste impact, buildout under the WC2035 Plan was estimated to result in a net increase in solid waste generation by 149,000 pounds (74.5 tons) per day by 2035. This represents about 0.6 percent of the permitted daily capacity of the Sunshine Canyon landfill, or about 1.5 percent of the remaining landfill's daily capacity. Therefore, the WC2035 Plan FEIR determined that the available capacity of the existing and/or planned landfills would not be exceeded, and the WC2035 Plan's impact on solid waste would be less than significant. It also determined that although Sunshine Canyon was anticipated to close in 2037, it was anticipated that additional capacity would be permitted at this or other facilities, sufficient to accommodate the implementation of the WC2035 Plan. It also noted that individual projects would be subject to City solid waste diversion measures, which would reduce the anticipated overall waste stream to area landfills. (WC2035 Plan DEIR, p. 4.13-33)

Notwithstanding the WC2035 Plan FEIR's determination that the impact on solid waste would be less than significant, it recommended Mitigation Measure WC-U-12, presumably to ensure that such impacts associated with individual projects would be less than significant. (WC2035 Plan DEIR, p. 4.13-33)

This analysis adequately addressed the Project's impact on solid waste. The generation of solid waste generated by the construction and operation of the Project are consistent within the City's estimates for solid waste in the WC2035 Plan area. The density of the proposed Project is substantially lower than the density assumed for the Project Site in the WC2035 Plan EIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1.

Moreover, although not required to reduce the Project's impact on solid waste to a less-than-significant level, in accordance with Mitigation Measure WC-U-12, the Project's construction debris would be subject to the City's solid waste diversion measures, as described above, and the provision of a recycling area or room for onsite recycling activities would be required with respect to project operation. The Project would also comply with federal, state and local statutes and regulations related to solid waste. the anticipated overall waste stream to area landfills

For these reasons, the Project would be served by landfills with sufficient capacity to accommodate the Project's solid waste disposal needs. Therefore, the Project's impacts on solid waste would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following two mitigation measures from the WC2035 Plan FEIR are recommended to mitigate the Project's impacts with respect to solid waste (this mitigation measure has been non-substantively modified to apply specifically to the Project):

U-12: The Applicant shall ensure that the Project recycles and/or salvages at least 75% of non-hazardous construction and demolition debris, in addition to the preparation of a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or comingled shall be developed and implemented. Excavated soil and land-clearing debris do not contribute to the amount of recycled/salvaged debris. Calculations can be done by weight or volume, but must be consistent throughout.

19. Energy

Analysis in the WC2035 Plan FEIR

Electricity

As discussed in the WC2035 Plan FEIR (which includes the WC2035 Plan DEIR), construction activities within the WC2035 Plan area (which includes the Project Site) would consume relatively

minor quantities of electricity (i.e., temporary use for lighting and small power tools and possibly some large equipment). Therefore, it concluded that electricity impacts during the construction of individual projects within the WC2035 Plan area were anticipated to be less than significant. (WC2035 Plan DEIR, pp. 4.13-35-36)

With regard to operational impacts, the WC2035 Plan FEIR discussed that electrical services to the WC2035 Plan area would be provided in accordance with Los Angeles Department of Water and Power (LADWP) rules and regulations, and each implementing project would be required to comply with the State Building Energy Efficiency Standards set forth in Title 24 of the California Code of Regulations (CCR, Title 24). It also stated that each implementing project would be developed in consultation with LADWP to ensure that existing and/or planned electrical facilities were capable of meeting consumption demands. Individual projects would be required to obtain appropriate clearance from LADWP at the time an electrical connection permit is submitted (consistent with Mitigation Measure WC-U-13, as discussed below). The WC2035 Plan FEIR anticipated that each project applicant, in coordination with LADWP, would identify specific onsite and offsite improvements needed to ensure that impacts related to electrical supply and demand capacity are addressed prior to issuance of permits for each implementing project (consistent with Mitigation Measure WC-U-13). (WC2035 Plan DEIR, pp. 4.13-35-36)

Since the specific future development (including timing and intensity) associated with buildout of the WC2035 Plan was unknown when the WC2035 Plan FEIR was prepared, the WC2035 Plan FEIR concluded that it was unclear if existing electrical facilities would be capable of accommodating increased demand, and therefore impacts related to electrical facilities were considered to be potentially adverse and significant. Accordingly, the WC2035 Plan FEIR included Mitigation Measure WC-U-13, which requires each project applicant to coordinate with LADWP in order to ensure that existing and/or planned electrical facilities are capable of meeting electrical demand requirements. It also requires each project applicant, in coordination with LADWP, to identify specific onsite and offsite improvements needed to ensure that impacts related to electrical facility requirements are addressed prior to operation. Mitigation Measure WC-U-13 also requires electrical facility design clearance from LADWP for each individual project. In addition, Mitigation Measure WC-U-14, which requires that each project applicant consult with LADWP's Energy Services Subsection and the Southern California Gas Company (SoCal Gas, also known as the "Gas Company") regarding energy conservation measures for the project during the design process. The WC2035 Plan FEIR concluded that, with the implementation of Mitigation Measures WC-U-13 and WC-U-14, impacts on electrical demand and facilities would be less than significant. (WC2035 Plan DEIR, pp. 4.13-35-38)

Buildout under the WC2035 Plan was anticipated to increase electrical consumption in the area by approximately 778,000 kilowatt hours (kWh) per day. The WC2035 Plan FEIR noted that this amount may be less with conservation and increased use of site-specific alternative energy (e.g., photovoltaic panels), although increased use of electricity to power vehicles may offset conservation measures somewhat. The LADWP estimated annual system-wide electrical consumption of 31.1 million megawatt hours (MWh) in 2030. The anticipated increase in annual electricity consumption associated with buildout under the WC2035 Plan represented a relatively

small proportion of LADWP's total projected electrical consumption for that year, and would be within the anticipated service capacity of LADWP since the WC2035 Plan would be consistent with the growth projections for the City. Therefore, the WC2035 Plan FEIR concluded that impacts associated with electrical consumption would be less than significant. (WC2035 Plan DEIR, p. 4.13-36)

Natural Gas

The WC2035 Plan FEIR concluded that construction activities within the WC2035 Plan area were not anticipated to consume natural gas and, therefore, impacts on gas supply or infrastructure during construction would be less than significant. (WC2035 Plan DEIR, p. 4.13-39)

With regard to operational impacts, the WC2035 Plan FEIR discussed that natural gas services to the WC2035 Plan area would be provided in accordance with SoCal Gas rules and regulations, and implementing projects would be required to comply with the State Building Energy Efficiency Standards set forth in Title 24 of the California Code of Regulations (CCR, Title 24). Development of each project within the WC2035 Plan area would be coordinated with SoCal Gas to ensure that existing and/or planned natural gas facilities are capable of meeting consumption demands. The WC2035 Plan FEIR stated that changes to the existing onsite and offsite infrastructure and distribution systems may be required in consultation with SoCal Gas to meet the needs of anticipated development within the WC2035 Plan area (consistent with Mitigation Measure WC-U-15, as discussed below). It also anticipated that minor alterations to natural gas transmission and distribution infrastructure within the WC2035 Plan area may be necessary to serve specific individual projects (consistent with Mitigation Measure WC-U-15). (W2035 Plan DEIR, pp. 4.13-39-40)

Since the specific future development (including timing and intensity) associated with buildout under the WC2035 Plan was unknown when the WC2035 Plan FEIR was prepared, the WC2035 Plan FEIR concluded that it was unclear if existing onsite and offsite natural gas facilities would be capable of accommodating increased demand, and therefore impacts related to natural gas facilities were considered to be potentially adverse and significant. Accordingly, the WC2035 Plan FEIR included Mitigation Measure WC-U-15, which requires that each applicant coordinate with SoCal Gas in order to ensure that existing and/or planned natural gas facilities are capable of meeting natural gas demand requirements. The mitigation measure provides that in coordination with SoCal Gas, the project applicant would identify onsite and offsite improvements needed to ensure that impacts related to natural gas facility requirements are addressed prior to operation of the individual project. It also requires natural gas facility design clearance from SoCal Gas for each project. The WC2035 Plan FEIR concluded that, with the implementation of Mitigation Measure WC-U-15, impacts on natural gas demand and facilities would be less than significant. (WC2035 Plan DEIR, pp. 4.13-40-41)

The WC2035 Plan FEIR stated that the development of individual projects within the WC2035 Plan area would occur incrementally through 2035. The WC2035 Plan FEIR determined that natural gas consumption at 2035 buildout could increase by 3.4 Million Cubic Feet (MMcf) per day. SoCal Gas projected an annual consumption of 988,785 MMcf per day in 2030 and a projected

available capacity of 1,414,375 MMcf. The WC2035 Plan FEIR stated that the annual increase in natural gas consumption attributed to development of the WC2035 Plan represented a small portion of total consumption projected by SoCal Gas for 2030 and would be within the population projections for the City. Therefore, it determined that the natural gas consumption attributed to the development of the WC2035 Plan was anticipated to be within the anticipated service capacity of SoCal Gas. As such, the WC2035 Plan FEIR concluded that while natural gas supply facilities may be needed within the WC2035 Plan area and therefore require the construction of local infrastructure for larger projects, overall consumption impacts on natural gas supply facilities would be less than significant. (W2035 Plan DEIR, pp. 4.13-39-40)

WC2035 Plan FEIR Mitigation Measures

The WC2035 Plan DEIR recommended the following three mitigation measures, designated as WC-U-13 through WC-U-15, with respect to the potentially significant impacts related to electricity and natural gas demand and facilities. (WC2035 Plan DEIR, pp. 4.13-37, 4.13-41)

WC-U-13: The City shall require that each applicant coordinate with the City of Los Angeles' Department of Water and Power in order to ensure that existing and/or planned electrical facilities are capable of meeting electrical demand requirements. In coordination with the Department of Water and Power, the applicant will be required to identify specific on- and off-site improvements needed to ensure that impacts related to electrical facility requirements are addressed prior to operation. Electrical facility design clearance from the Department of Water and Power will be required as established by the LADWP.

WC-U-14: The City shall require that each project, during the design process, consult with the Department of Water and Power, Energy Services Subsection and the Southern California Gas Company, the Commercial, Industrial or Residential Staff Supervisor, regarding possible Energy Conservation Measures for each project.

WC-U-15: The City shall require that each applicant coordinate with the Gas Company in order to ensure that existing and/or planned natural gas facilities are capable of meeting natural gas demand requirements. In coordination with the Gas Company, the applicant will identify specific on- and off-site improvements needed to ensure that impacts related to natural gas facility requirements are addressed prior to operation. Natural gas facility design clearance from the Gas Company will be required as established by the Gas Company.

Project Impacts and Applicable Mitigation Measures

Against the background described above, the Project's tiered impacts on energy resources and applicable mitigation measures identified in the WC2035 Plan DEIR, are discussed below.

In accordance with Appendix F to the State CEQA Guidelines, for purposes of this Tiered IS, the City has determined that the Project would have a significant impact with regard to energy if the Project would:

(a) Conflict with adopted energy conservation plan?

Construction

Less than Significant Impact with Mitigation Incorporated. As discussed in the WC2035 Plan FEIR, construction activities within the WC2035 Plan area would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools and possibly some large equipment) and would not be anticipated to consume natural gas. Therefore, it concluded that electricity and natural gas impacts during the construction of implementing projects within the WC2035 Plan area were anticipated to be less than significant. (WC2035 Plan DEIR pp. 4.13-35-36)

This analysis is fully applicable to the Project. The Project's construction activities would require the consumption of relatively minor quantities of electricity and would not occur all at once, but rather incrementally over eight phases between 2020 and 2035. The minor amounts of electricity would also be offset by demolition of the Existing Buildings that would cease to operate. The Project's construction activities are not anticipated to require the consume natural gas.

With respect to construction transportation fuel, the Project would implement Mitigation Measures WC-AQ-4 through WC-AQ-8, which would require the Applicant to provide rideshare and transit incentives to construction personnel, configure construction parking to minimize interference with traffic lanes, minimize the obstruction of through-traffic in the vicinity of construction sites, use flag people during construction to guide traffic properly, and require that construction activities that could affect roadways be scheduled for off-peak period (refer to Section 3, Air Quality). (WC2035 Plan DEIR pp. 4.2-39-40)

The Project has also satisfied Mitigation Measure TR-100, which requires the Applicant to assess construction traffic impacts prior to project approval and, if necessary, implement a construction traffic management plan, subject to LADOT approval, for each phase of the Project (see the discussion of the Project's construction traffic impacts in Section 16, Transportation and Circulation) (WC2035 Plan FEIR pp. V-33-34). The implementation of Mitigation Measure TR-100 has reduced the Project's construction traffic impacts, thereby reducing construction traffic congestion. Therefore, the Project's construction activities would not conflict with adopted energy conservation plans and the impact would be less than significant, and this impact was adequately addressed in the WC2035 Plan FEIR.

Operation

Less than Significant Impact with Mitigation Incorporated. With respect to operations, the WC2035 Plan FEIR discussed that electrical services to the WC2035 Plan area would be provided in accordance with LADWP rules and regulations, and each implementing project would be required to comply with the State Building Energy Efficiency Standards set forth in Title 24 of the California Code of Regulations (CCR, Title 24). It also stated that each implementing project would

be developed in consultation with LADWP to ensure that existing and/or planned electrical facilities were capable of meeting consumption demands. Individual projects would be required to obtain appropriate clearance from LADWP at the time an electrical connection permit is submitted (consistent with Mitigation Measure WC-U-13). The WC2035 Plan FEIR anticipated that each project applicant, in coordination with LADWP, would identify specific onsite and offsite improvements needed to ensure that impacts related to electrical supply and demand capacity are addressed prior to issuance of permits for each implementing project (consistent with Mitigation Measure WC-U-13). (WC2035 Plan DEIR, pp. 4.13-35-36)

In addition, the WC2035 Plan FEIR includes Mitigation Measure WC-U-14, which requires that each project applicant consult with LADWP's Energy Services Subsection and SoCal Gas regarding energy conservation measures for the Project during the design process with respect to each New Building. Implementation of Mitigation Measure WC-U-14 helped reduce the potentially significant and adverse impact on electrical demand and facilities. (WC2035 Plan DEIR, p. 4.13-37)

The WC2035 Plan FEIR also discussed that natural gas services to the WC2035 Plan area would be provided in accordance with SoCal Gas rules and regulations, and implementing projects would be required to comply with the State Building Energy Efficiency Standards set forth in Title 24 of the California Code of Regulations (CCR, Title 24). Without individual project information, the WC2035 Plan FEIR concluded that impacts related to natural gas facilities were considered to be potentially adverse and significant and recommended Mitigation Measure WC-U-15, which requires that each applicant coordinate with SoCal Gas in order to ensure that existing and/or planned natural gas facilities are capable of meeting natural gas demand requirements. With the implementation of Mitigation Measure WC-U-15, the WC2035 Plan FEIR concluded that impacts on natural gas demand and facilities would be less than significant. (WC2035 Plan DEIR, pp. 4.13-39-41)

With respect to land use-related transportation efficiency plans, as discussed in the WC2035 Plan FEIR, implementation of the long-term development in the WC2035 Plan area would be consistent with regional land use plans, the City's General Plan Framework, the Community Plan, the Los Angeles River Revitalization Master Plan, and the General Plan Housing Element (WC2035 Plan DEIR, pp. 4.8-24-25, 28-30, Tables 4.8-2 and 4.8-3). The WC2035 Plan FEIR concluded that the WC2035 Plan would be consistent with regional plans, including Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP), Metro's Congestion Management Plan, because it would balance and concentrate growth around transit, thus reducing regional vehicle trips and vehicle miles traveled (VMT), and therefore also reducing criteria air pollutant emissions (WC2035 Plan DEIR, p. 4.8-24). Furthermore, implementation of the WC2035 Plan would locate both jobs and residents close to transit and regional VMT would be anticipated to decrease with implementation of the WC2035 Plan as compared to No Project conditions in 2035 (WC2035 Plan DEIR, p. 4.2-31).

Consistent with the WC2035 Plan FEIR, the Project would be designed in a manner that is consistent with relevant electricity and natural gas energy conservation plans designed to encourage development that results in the efficient use of energy resources and would comply with the applicable provisions of Title 24 Building Energy Efficiency Standards and the California Green Building Standards (CALGreen) Code in effect at the time of building permit issuance, therefore reducing the relative electricity and natural gas demand. The Title 24 Standards and CALGreen Code are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The current 2016 Title 24 Standards and CALGreen Code became effective on January 1, 2017[118,119] and the California Energy Commission (CEC) has stated that the 2016 Title 24 standards result in 28 percent less building energy demand for residential and 5 percent less building energy demand for nonresidential lighting, heating, cooling, ventilation, and water heating compared to the previous 2013 Title 24 standards.[120] The Project would also be designed to achieve the equivalent of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Silver Certification level for the New Buildings as well as waste reduction features that would enhance the Project's energy efficient design for electricity and natural gas.

The Project would comply with City electricity and natural gas energy conservation regulations and plans, including the Los Angeles Green Building Code, to reduce energy consumption by implementing energy efficient building designs, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. These energy conservation measures are consistent with the City's sustainability and smart-growth goals of improving energy and water efficiency in buildings, decreasing per-capita water use, using energy efficient appliances and equipment, and creating a more livable city.

As stated in the WC2035 Plan FEIR, the City published a climate action plan in 2007 titled "GreenLA." (WC2035 Plan DEIR, p. 4.2-36) When implemented, the following planned City actions, as presented in the GreenLA plan, may further decrease energy consumption from the Project. These actions are not under the control of the Applicant; however, they would nonetheless further reduce Project-related energy use from non-renewable sources:

- Decreasing emissions from LADWP electrical generation and import activities;
- Promoting walking and biking to work, within neighborhoods, and to large events and venues; and
- Expanding the regional rail network to reduce VMT.

118 California Energy Commission, 2016 Building Energy Efficiency Standards, http://www.energy.ca.gov/title24/2016standards/index.html. Accessed May 2018.

119 California Building Standards Commission, 2016 California Green Building Standards Code, http://www.bsc.ca.gov/Home/CALGreen.aspx. Accessed May 2018.

120 California Energy Commission, Adoption Hearing, 2016 Building Energy Efficiency Standards, June 10, 2015, http://www.energy.ca.gov/title24/2016standards/rulemaking/documents/2015-06-10_hearing/2015-06-10_Adoption_Hearing_Presentation.pdf. Accessed May 2018.

Based on the Project's incorporation of energy efficient designs and with implementation of Mitigation Measures WC-U-13, WC-U-14 and WC-U-15, operation of the Project would be consistent with applicable energy conservation plans.

Consistent with the findings in the WC2035 Plan FEIR, the Project would also be consistent with regional land use plans and would include transportation energy efficient characteristics. In June of 2018, the Metro Orange Line no longer directly serves Warner Center. Instead, Orange Line buses operate between North Hollywood and Chatsworth with a transfer to and from the new Circulator at the Orange Line's Canoga Station. The Circulator will provide shuttle service to the Project Site, using Warner Center Lane as a turnaround. As shown in Figure A-1, there are two bus stops located immediately adjacent to the Project Site, one on De Soto Avenue (Los Angeles County Metro Line 244 and Santa Clarita Transit Commuter Express Line 796) and the other on Burbank Boulevard (Ventura County Transportation Commission Highway 101/Conejo Connection and Antelope Valley Transit Authority Line 787). The Project would be expected to concentrate jobs and residents closer to transit compared to existing conditions. Thus, the Project's transportation energy efficient characteristics would be consistent with land use-related transportation efficiency plans.

As such, operation of the Project would not conflict with the City's adopted energy conservation plans and the Project's impact would therefore be less than significant, consistent with the discussion in the WC2035 Plan FEIR.

(b) Violate State or federal energy standards?

Construction

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, construction activities within the WC2035 Plan area would require the consumption of relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools and possibly some large equipment) and is not anticipated to require the consumption of natural gas. Therefore, it concluded that electricity and natural gas impacts during the construction of individual projects within the WC2035 Plan area would be less than significant. (WC2035 Plan DEIR pp. 4.13-35-36)

This analysis is fully applicable to the Project. The Project's construction activities would require the consumption of relatively minor quantities of electricity and would not occur all at once, but rather incrementally over eight phases between 2020 and 2035. The minor amounts of electricity would also be offset by demolition of the Existing Buildings that would cease to operate. The Project's construction activities are not anticipated to require the consumption of material quantities of natural gas.

With respect to construction transportation fuel, construction contractors for the Project would be required to comply with applicable California Air Resources Board (CARB) regulations restricting the idling of heavy-duty diesel motor vehicles. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. The measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than 5 minutes at any given time. While intended to reduce vehicle emissions, compliance with the anti-idling regulation would

also result in energy savings by reducing unnecessary idling. According to the CARB staff report that was prepared at the time the anti-idling Airborne Toxic Control Measure was being proposed for adoption in late 2004/early 2005, the regulation was estimated to reduce non-essential idling and associated emissions of diesel particulate matter and nitrogen oxide (NOX) emissions by 64 and 78 percent respectively in analysis year 2009.[121] These reductions in emissions are directly attributable to overall reduced idling times and the resultant reduced fuel consumption. Therefore, as Project construction would be required to comply with the State's anti-idling regulation, the Project would not violate federal or state energy standards and the impact would be less than significant, consistent with the analysis in the WC2035 Plan FEIR.

Operation

Less Than Significant Impact. With respect to operations, the WC2035 Plan FEIR discussed that electrical services to the WC2035 Plan area would be provided in accordance with LADWP and SoCalGas rules and regulations, and each implementing project would be required to comply with the State Building Energy Efficiency Standards set forth in Title 24 of the California Code of Regulations (CCR, Title 24). (W2035 Plan DEIR, pp. 4.13-39-40)

The Project would comply with or exceed the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance. As specified in Mitigation Measure WC-AQ-22, the Project would include drought tolerant landscaping reduce water consumption and provide passive solar benefits, that would allow the Project to comply with and exceed the Title 24 standards and achieve greater energy savings than required by state regulations (refer to Section 3, Air Quality).

With respect to operational transportation-related fuel usage, the Project is consistent with Statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project would co-locate residential, work-live, office, hotel, retail and restaurant land uses on the Project Site in proximity to existing offsite commercial and retail destinations and residential areas and in proximity to existing public transit stops, which would result in reduced vehicle trips and VMT. The Project would be consistent with and support the goals and benefits of the SCAG 2016 RTP/SCS, which promotes improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them. "[122]

Therefore, the operation of the Project would be consistent with State and federal energy standards and would be designed to include numerous energy and waste saving features, as well as waste reduction features that would achieve greater energy savings than required. The Project would also be sited in a transportation-efficient location and achieve reductions in VMT with respect to private automobiles traveling to and from the Project Site consistent with the 2016 RTP/SCS. Accordingly,

121 California Air Resources Board, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, Appendix F, July 2004, https://www.arb.ca.gov/regact/idling/isorappf.pdf. Accessed May 2018.

122 Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, page 16, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf. Accessed May 2018.

the operation of the Project would not violate federal or state energy standards and the impact would be less than significant.

(c) Cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation?

Construction

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, construction activities within the WC2035 Plan area would consume relatively minor quantities of electricity. Therefore, it concluded that electricity impacts during the construction of individual projects within the WC2035 Plan area were anticipated to be less than significant. Construction activities within the WC2035 Plan area were not anticipated to consume natural gas and therefore, impacts on gas supply or infrastructure during construction would be less than significant. (WC2035 Plan DEIR, pp. 4.13-35-36, 39)

This analysis is fully applicable to the Project. The Project's construction activities would consume relatively minor quantities of electricity and would not occur all at once, but rather incrementally over eight phases between 2020 and 2035. The minor amounts of electricity would also be offset by demolition of the existing buildings that would cease to operate. The electricity demand for each of the eight phases would cease upon completion of construction of each phase. The Project's construction activities are not anticipated to require the consumption of material quantities of natural gas.

With respect to construction transportation fuel, the estimated fuel usage for off-road equipment is based on the number and type of equipment that would be used during construction activities, hour usage estimates, the total duration of construction activities, and hourly equipment fuel consumption factors from the CARB OFFROAD model. On-road equipment would include trucks to haul material to and from the Project Site, vendor trucks to deliver supplies necessary for Project construction, and fuel used for employee commute trips. The estimated fuel usage for on-road trucks is based on the engineering estimates that form the basis of the construction-related impact analyses and fuel consumption information from the CARB on-road vehicle emissions model, EMFAC2014. The number of construction workers that would be required would vary based on the phase of construction and activity taking place. The transportation fuel required by construction workers to travel to and from the Project Site would depend on the total number of worker trips estimated for the duration of construction activity. The estimated fuel usage for construction worker commutes is based on the estimated number of workers for different phases of construction, the average distance that the workers would travel on local and regional roadways from the California Emissions Estimator Model (CalEEMod), and emissions factors in the EMFAC2014 model. A summary of the annual fuel consumption during construction of the Project is provided in **Table B-27**, *Project Construction Fuel Usage* (see Appendix O to this Tiered IS for energy impact calculations). As shown, on- and off-road vehicles would consume an estimated annual average of 43,941 gallons of diesel fuel and 24,479 gallons of gasoline for each year of Project construction. Compliance with the anti-idling regulation would reduce the Project's annual average diesel fuel usage by approximately 2,794 gallons of diesel for each year of Project construction.

Based on the available data, construction would utilize energy for necessary onsite activities and to transport construction materials and demolition debris to and from the Project Site. As discussed above, idling restrictions would result in less fuel combustion and energy consumption and thus minimize the Project's construction-related energy use.

For these reasons, construction of the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy and the impact would be less than significant.

TABLE B-27
PROJECT CONSTRUCTION FUEL USAGE

Source	Average Gallons of Diesel Fuel Per Year	Average Gallons of Gasoline Fuel Per Year
Construction:		
Heavy-Duty Construction Equipment	27,591	—
Haul Trucks	3,115	—
Vendor Trucks	13,235	—
Worker Trips	—	24,479
Annual Average	**43,941**	**24,479**
Estimated Project Fuel Savings from truck anti-idling regulation (Annual)	2,794 (Anti-Idling ATCM)	—

SOURCE: ESA 2018.

Operation

Less Than Significant Impact. With respect to Project operations, the WC2035 Plan FEIR discussed that electrical services to the WC2035 Plan area would be provided in accordance with LADWP and SoCalGas rules and regulations, and each individual project would be required to comply with the State Building Energy Efficiency Standards set forth in Title 24 of the California Code of Regulations (CCR, Title 24). (W2035 Plan DEIR, pp. 4.13-39-40)

The electricity and natural gas consumption for the Project would be consistent with the projected consumption in the WC2035 Plan FEIR. The Project's mix of residential, work-live, office, hotel, restaurant and retail land uses is consistent with the WC2035 Plan as analyzed in the WC2035 Plan FEIR. Moreover, the density of the Project is within the density assumed for in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at an FAR of 3.0:1. In comparison, the Project would be developed at a lower FAR of 2.52:1. This further demonstrates that the WC2035 Plan FEIR adequately addressed the Project's operational impact on electrical consumption.

The Project would result in increased demand for electricity resources, including for water supply, conveyance, distribution, and treatment, as compared to the electrical demand for the existing commercial uses on the Project Site. The Project's estimated net operational electricity demand, including from water demand, is provided in **Table B-28,** *Project Operational Energy Usage* (see Appendix O to this Tiered IS for energy impact calculations). As shown in Table B-28, at full

buildout, the Project would result in a projected consumption of electricity totaling approximately 35.0 million kWh per year. The Existing Buildings use approximately 6.82 million kWh per year. As such, the Project would result in a net new consumption of electricity of 28.1 million kWh per year.

TABLE B-28
PROJECT OPERATIONAL ENERGY USAGE

Source	Natural Gas Per Year (million kBtu)	Electricity Per Year (million kWh)	Gallons of Diesel Fuel Per Year	Gallons of Gasoline Fuel Per Year
Operations:				
Existing Buildings [a]	5.0	6.8	41,988	390,382
Proposed Project [a]				
Building Energy and Transportation	37.2	30.0	244,761	1,827,307
Water Electricity [b]	—	5.0	—	—
Net Total	**32.2**	**28.1**	**205,439**	**1,436,924**
Estimated Project Energy Savings from energy saving features (Annual)	Not quantifiable due to undetermined LEED measures and unknown reductions from future energy efficiency standards.		—	38,837 (potential savings from electric vehicle supply equipment)

[a] Existing and Project gasoline and diesel are calculated based on the estimated VMT and fuel consumption factors from EMFAC2014. Electricity and natural gas are calculated using CalEEMod (includes water-related electricity for conveyance and treatment).

[b] Electricity for water supply, treatment, distribution, and wastewater treatment.

SOURCE: ESA 2018.

The Project would result in demand for natural gas primarily for heating and cooking. The Project's estimated net operational natural gas demand is provided in Table B-28. As shown in Table B-28, the Project is projected to generate an annual demand for natural gas totaling approximately 37.2 million kBtu. As previously discussed, the Project Site currently contains offices and surface parking lots that consume approximately 5.0 million kBtu of natural gas. As such, the Project would result in a net new consumption of natural gas of approximately 32.2 million kBtu.

Consistent with the WC2035 Plan FEIR, the Project would comply with the applicable provisions of the CALGreen Code. As stated in Attachment A, Project Description, of this Tiered IS, the Project would also be designed to achieve the equivalent of the USGBC LEED Silver Certification level for the New Buildings, as well as include waste reduction features that would enhance the Project's energy efficient design. As specified in Mitigation Measure WC-AQ-22, the Project has been designed to include energy and water saving features, which include drought tolerant landscaping and passive solar benefits, that would allow the Project to comply with and exceed the Title 24 standards and achieve greater energy savings than required by state regulations (refer to Section 3, Air Quality).

The Project's estimated operational transportation fuel demand is also provided in Table B-28. As discussed previously, the Project would support Statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. By locating the Project's mix of residential, work-live, office, hotel, restaurant and retail land uses on an infill location in proximity to existing offsite commercial, and retail destinations and residential areas and in proximity to existing public transit stops, the Project would minimize vehicle trips and VMT. The Project would be consistent with and support the goals and benefits of the SCAG 2016 RTP/SCS, which promotes improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them."[123] The Project would also include the installation of conduit and infrastructure for electric vehicle supply equipment (EVSE), pursuant to the CALGreen Code and LAMC requirements. According to the EMFAC2014 model, electric vehicles are predicted to account for approximately two percent of passenger vehicles in the region. The estimated potential gasoline fuel savings from electric vehicles is provided in Table B-29.

Given the evidence presented above, the Project would minimize operational electricity, natural gas, and transportation fuel demand consistent with State and City goals and would exceed regulatory mandates.

For these reasons, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity, natural gas, and transportation fuel and the impact would be less than significant.

(d) Result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction

Less Than Significant Impact. As discussed in the WC2035 Plan FEIR, construction activities within the WC2035 Plan area would require the consumption of relatively minor quantities of electricity. Therefore, it concluded that electricity impacts during the construction of implementing projects within the WC2035 Plan area were anticipated to be less than significant. (WC2035 Plan DEIR pp. 4.13-35-36) The WC2035 Plan FEIR discussed that construction activities within the WC2035 Plan area were not anticipated to require the consumption of natural gas and, therefore, the impact on gas supply or infrastructure during construction would be less than significant. (WC2035 Plan DEIR, p. 4.13-39)

This analysis is fully applicable to the Project. The Project's construction activities would require the consumption of relatively minor quantities of electricity and, as stated above, are anticipated to

123 Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, page 16, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf. Accessed May 2017.

occur over eight phases between 2020 and 2035. The electricity demand for each of the eight phases would cease upon completion of construction of that phase. Moreover, construction electricity usage would be offset by the reduction in electrical demand associated with the demolition of the Existing Buildings at the Project Site during construction. Accordingly, the construction activities for the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, the Project's impact on electricity associated with construction activities would be less than significant and was adequately addressed in the WC2035 Plan FEIR.

Construction of the Project would result in transportation fuel demand from off-road equipment, on-road haul trucks and vendor trucks, and worker commute trips. According to fuel sales data from the CEC, fuel consumption in Los Angeles County was approximately 3.58 billion gallons of gasoline and 581 million gallons of diesel fuel in 2016.[124] For comparison purposes, as shown in **Table B-29,** *Project Energy Usage and State and Regional Energy Supply*, the annual average Project construction transportation-related fuel usage would represent approximately 0.0076 percent of the 2016 annual diesel and 0.0007 percent of the annual gasoline energy consumption in Los Angeles County (see Appendix O to this Tiered IS for energy impact calculations).

Construction-related transportation energy, which includes the consumption of gasoline and diesel fuel for off-road equipment, on-road trucks, and worker vehicles, would be a very small percentage of the County's transportation fuel demand and would be provided by existing transportation fuel providers. Transportation fuel during construction would be provided by existing retail service stations and from existing mobile fuel services that are typically needed to deliver fuel to a construction site to refuel the off-road construction equipment at the Project Site. Construction of the Project would not require new or expanded transportation energy infrastructure the construction of which could cause significant environmental effects. Therefore, the Project's impact would be less than significant and was adequately addressed in the WC2035 Plan FEIR, as confirmed by the above analysis.

TABLE B-29
PROJECT ENERGY USAGE AND STATE AND REGIONAL ENERGY SUPPLY

Source	Natural Gas Per Year (million kBtu)	Electricity Per Year (million kWh)	Diesel Fuel Per Year (gallons)	Gasoline Fuel Per Year (gallons)
SoCal Gas (2016) [a]/LADWP (2035-2036) [b]	304,290	29,632	—	—
County of Los Angeles (CEC 2016) [c]	—	—	581,000,000	3,577,000,000
Construction:				
Heavy-Duty Construction Equipment	—	Minor [f]	27,591	—
Haul Trucks	—	—	3,115	—

124 California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2016, http://www.energy.ca.gov/almanac/transportation_data/gasoline/2016_A15_Results.xlsx. Accessed May 2018. Diesel is adjusted to account for retail (52%) and non-retail (48%) diesel sales.

Source	Natural Gas Per Year (million kBtu)	Electricity Per Year (million kWh)	Diesel Fuel Per Year (gallons)	Gasoline Fuel Per Year (gallons)
Vendor Trucks	—	—	13,235	—
Worker Trips	—	—	—	24,479
Annual Average	**—**	Minor [f]	**43,941**	**24,479**
Percent of County (Transportation Sector)	—	Minor [f]	0.0076%	0.0007%
Operations:				
Existing Offices [d]	5.0	6.8	41,988	390,382
Proposed Project [d]				
Building Electricity and Transportation	37.2	30.0	244,761	1,827,307
Water Electricity [e]	—	5.0	—	—
Net Total	**32.2**	**18.1**	**205,439**	**1,436,924**
Percent of SoCal Gas/LADWP	0.011%	0.095%		
Percent of County (Transportation Sector)			0.035%	0.040%

[a] Sempra Energy, 2016 Annual Report, 2017, http://www.sempra.com/pdf/financial-reports/2016_annualreport.pdf. Accessed May 2017. Converted from 294 billion cubic feet and a conversion factor of 1,035 Btu per cubic foot based on United States Energy Information Administration data (see: USEIA, Natural Gas, Heat Content of Natural Gas Consumed, April 28, 2017, https://www.eia.gov/dnav/ng/ng_cons_heat_a_EPG0_VGTH_btucf_a.htm. Accessed May 2017).

[b] Los Angeles Department of Water and Power, 2016 Retail Electric Sales and Demand Forecast, June 2016, http://ezweb.ladwp.com/Admin/Uploads/Load%20Forecast/2016/08/2016%20Retail%20Sales%20Forecast_Signed.pdf, Accessed May 2017.

[c] California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2016, http://www.energy.ca.gov/almanac/transportation_data/gasoline/2016_A15_Results.xlsx. Accessed May 2018. Diesel is adjusted to account for retail (52%) and non-retail (48%) diesel sales.

[d] Existing and Project gasoline and diesel are calculated based on the estimated VMT and fuel consumption factors from EMFAC2014. Electricity and natural gas are calculated using CalEEMod (includes water-related electricity for conveyance and treatment).

[e] Electricity for water supply, treatment, distribution, and wastewater treatment.

[f] Construction electricity demand would be minor and would be offset by the reduction in electrical demand associated with the demolition of the existing uses at the Project Site during construction.

SOURCE: ESA 2017.

Operation

Less Than Significant Impact. In the absence of individual project information, the WC2035 Plan FEIR concluded that operational impacts related to electrical facilities would be potentially adverse and significant. However, with the implementation of Mitigation Measures WC-U-13 and WC-U-14 described above, the WC2035 Plan FEIR concluded that impacts on operational electrical demand and facilities would be less than significant. (WC2035 Plan DEIR, pp. 4.13-35-38)

The WC2035 Plan FEIR also provided that buildout under the WC2035 Plan was anticipated to increase electrical consumption in the area by approximately 778,000 kWh per day. The LADWP estimated annual system-wide electrical consumption of 31.1 million MWh in 2030. The anticipated increase in annual electricity consumption associated with buildout under the WC2035 Plan represented a relatively small proportion of LADWP's total projected electrical consumption for that year, and would be within the anticipated service capacity of LADWP since the WC2035 Plan would be consistent with the growth projections for the City. Therefore, the WC2035 Plan

FEIR concluded that impacts associated with electrical consumption would be less than significant. (WC2035 Plan DEIR, pp. 4.13-36)

Without individual project information, the WC2035 Plan FEIR concluded that impacts related to natural gas facilities would be potentially adverse and significant. Accordingly, the WC2035 Plan FEIR included Mitigation Measure WC-U-15, which requires that each applicant coordinate with SoCal Gas in order to ensure that existing and/or planned natural gas facilities are capable of meeting natural gas demand requirements. The mitigation measure provides that, in coordination with SoCal Gas, each project applicant would identify onsite and offsite improvements needed to ensure that impacts related to natural gas facility requirements would be addressed prior to operation of the individual project. It also states that natural gas facility design clearance from SoCal Gas would be required for each project. With the implementation of Mitigation Measure WC-U-15, the WC2035 Plan FEIR concluded that impacts on natural gas demand and facilities would be less than significant. (WC2035 Plan DEIR, pp. 4.13-40-41)

The WC2035 Plan FEIR also determined that natural gas consumption at 2035 buildout could increase by 3.4 MMcf per day. SoCal Gas projected an annual consumption of 988,785 MMcf per day in 2030 and a projected available capacity of 1,414,375 MMcf. The WC2035 Plan FEIR stated that the annual increase in natural gas consumption attributed to development of the WC2035 Plan represented a small portion of total consumption projected by SoCal Gas for 2030 and would be within the population projections for the City. Therefore, it determined that the natural gas consumption attributed to the development of the WC2035 Plan was anticipated to be within the anticipated service capacity of SoCal Gas. As such, the WC2035 Plan FEIR concluded that while natural gas supply facilities may be needed within the WC2035 Plan area and therefore require the construction of local infrastructure for larger projects, overall consumption impacts with respect to natural gas supply facilities would be less than significant. (W2035 Plan DEIR, pp. 4.13-39-40)

This analysis is fully applicable to the Project. With regard to operational impacts related to electrical facilities, consistent with the WC2035 Plan FEIR, the Project would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance. The Project would also be designed to achieve the equivalent of LEED Silver Certification level for the New Buildings as well as include waste reduction features that would enhance the Project's energy efficient design. As such, the Project design features would minimize energy demand. Furthermore, in compliance with Mitigation Measure WC-U-13, the Applicant would coordinate with LADWP in order to ensure that existing and/or planned electrical facilities are capable of meeting electrical demand requirements and identify specific onsite and offsite improvements needed to ensure that impacts related to electrical facility requirements are addressed prior to operation. Electrical facility design clearance from LADWP would also be required for the Project. In addition, the Applicant would comply with Mitigation Measure WC-U-14, which requires the Applicant to consult with LADWP's Energy Services Subsection and the SoCal Gas regarding energy conservation measures for the Project during the design process. The implementation of these mitigation measures, together with compliance with applicable regulations, would reduce the potential impact on electrical demand and facilities to a less than significant level.

LADWP forecasts that its peak demand would be in the 2035-2036 fiscal year, the Project buildout year, and would be approximately 29,632 million kWh.[125] As shown in Table B-29 above, the Project's estimated net new electrical consumption would account for approximately 0.083 percent of LADWP's projected electricity sales for the Project's buildout year.

For these reasons, it is anticipated that the LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Therefore, the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities. Accordingly, the Project's impact related to electrical supply and infrastructure capacity would be less than significant with the implementation of Mitigation Measures WC-U-13 and WC-U-14, and this impact was adequately addressed in the WC2035 Plan FEIR, consistent with the analysis above.

According to SoCal Gas data, natural gas sales have been relatively stable over the past three years with a slight increase from 287 billion cubic feet in 2014 to 294 billion cubic feet in 2016. Based on the Project's estimated natural gas consumption as shown in Table B-29 above, the Project would account for approximately 0.011 percent of SoCal Gas natural gas sales. The Project would represent a very small portion of SoCal Gas' total natural gas sales and would be within the anticipated service capacity. Therefore, it is anticipated that SoCal Gas' existing and planned natural gas supplies would be sufficient to support the Project's demand for natural gas.

For these reasons, the Project would not result in an increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities. Therefore, the Project's impact related to natural gas would be less than significant with the implementation of Mitigation Measure WC-U-15.

The Project's estimated net energy and transportation fuel demand are also provided in Table B-29 above. To put the Project's net energy and transportation fuel demand into perspective, the values are compared to the energy sales from regional providers and state transportation fuel supplies. As shown in Table B-29, the Project would represent a very small fraction of the energy sales from regional providers and state transportation fuel supplies. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[126] As of December 31, 2016, California had approximately 1,933 million barrels (approximately 81.2 trillion gallons) of crude oil left in the state's reserves.[127] The Project's effect on transportation fuel demand would be minimized by future improvements to vehicle fuel economy pursuant to federal and State regulations. By 2025, vehicles are required to achieve 54.5 mpg (based on USEPA measurements),

125 Los Angeles Department of Water and Power, 2016 Retail Electric Sales and Demand Forecast, June 2016, http://ezweb.ladwp.com/Admin/Uploads/Load%20Forecast/2016/08/2016%20Retail%20Sales%20Forecast_Signed.pdf. Accessed May 2017.

126 BP Global, Oil reserves, 2018, http://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html. Accessed March 2018.

127 United States Energy Information Administration, California, Profile Data, April 19, 2018, https://www.eia.gov/state/data.cfm?sid=CA#ReservesSupply. Accessed May 2018.

which is a 54 percent increase from the 35.5 mpg standard in the 2012-2016 standards. As discussed previously, the Project is consistent with Statewide efforts to improve transportation energy efficiency by developing the Project at an infill location and thereby reduce VMT as outlined in the 2016 RTP/SCS for the region, which seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them."[128] Therefore, it is anticipated that existing and planned transportation fuel supplies and infrastructure would be sufficient to support the Project's demand for transportation fuel.

As demonstrated in the analysis above, the operation of the Project would not result in an increase in demand for electricity, natural gas, or transportation energy that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, the Project's impact would be less than significant, consistent with the analysis in the WC2035 Plan FEIR.

Summary of Recommended Project Mitigation Measures

Based on the foregoing analysis, the following three mitigation measures from the WC2035 Plan FEIR are recommended to mitigate the Project's potentially significant impacts to a less than significant level with respect to energy (these mitigation measures have been non-substantively modified to apply specifically to the Project):

U-13: The Applicant shall coordinate with the City of Los Angeles' Department of Water and Power in order to ensure that existing and/or planned electrical facilities are capable of meeting electrical demand requirements. In coordination with the Department of Water and Power, the Applicant will be required to identify specific on- and off-site improvements needed to ensure that impacts related to electrical facility requirements are addressed prior to operation. Electrical facility design clearance from the Department of Water and Power will be required as established by the LADWP.

U-14: During the design process for each phase of the Project, the Applicant shall consult with the Department of Water and Power, Energy Services Subsection, and the Southern California Gas Company, the Commercial, Industrial or Residential Staff Supervisor, regarding possible Energy Conservation Measures for the Project.

U-15: The Applicant shall coordinate with the Gas Company in order to ensure that existing and/or planned natural gas facilities are capable of meeting natural gas demand requirements. In coordination with the Gas Company, the Applicant will identify specific on- and off-site improvements needed to ensure that impacts related to natural gas facility requirements are addressed prior to operation of each phase of the Project. Natural gas

128 Southern California Association of Governments, 2016 RTP/SCS, p. 16, April 2016.

facility design clearance from the Gas Company will be required for each phase of the Project as established by the Gas Company.

20. Mandatory Findings of Significance

(a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. The preceding analyses do not disclose any significant unmitigable impacts on the environment. Therefore, the Project is not expected to degrade the quality of the environment. The Project Site is already fully developed and is located in an urbanized environment. As discussed above, the Project Site does not support sensitive plant or animal species. All impacts associated with the Project would be less than significant with the implementation of mitigation measures and some impacts do not require mitigation. Therefore, the Project's impact would be less than significant in this regard, and no additional mitigation measures are necessary.

(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact with Mitigation Incorporated. The WC2035 Plan is a planning document intended to provide detailed land use standards, requirements and guidance for development in the WC2035 Plan area (which includes the Project Site) through at least 2035, which is the earliest anticipated buildout of the WC2035 Plan area in accordance with the development assumptions contained in the WC2035 Plan FEIR (WC2035 Plan DEIR, p. 3-2). As such, the analyses in the WC2035 Plan FEIR are cumulative by their nature because they all analyze cumulative development within the entire WC2035 Plan area.

Moreover, the Project's incremental contribution to buildout under the WC2035 Plan would be substantially lower than the incremental contribution assumed for the Project Site in the WC2035 Plan FEIR. The development assumption for the Project Site in the WC2035 Plan FEIR was that the Project Site would be redeveloped at a FAR of 3.0:1. In comparison, the Project has a substantially lower FAR of 2.52:1.

Therefore, the cumulative impacts associated with the Project were adequately addressed in the WC2035 Plan FEIR. All cumulative impacts were examined at a sufficient level of detail to enable those effects to be mitigated or avoided, all applicable mitigation measures identified in the WC

2035 Plan FEIR would apply to the Project, and all cumulative impacts that are susceptible to mitigation would be mitigated or avoided.

(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the impact analyses in this Tiered IS, the Project would not result in any significant adverse effects after implementation of the applicable mitigation measures identified in the WC2035 Plan FEIR and/or those significant adverse effects were adequately addressed in the WC2035 Plan FEIR.

REFERENCES

The materials listed in this bibliography are available for review in the appendices to this Tiered Initial Study or on the Internet at locations indicated in the references below. The references are listed in the order in which they occur in this document.

1. City of Los Angeles, Warner Center Regional Core Comprehensive Specific Plan (Warner Center 2035 Plan) Final Program Environmental Impact Report. June 2012, https://planning.lacity.org/eir/WarnerCntrRegionalCore/FEIR/WarnerCenter_FEIR.pdf

2. City of Los Angeles, Warner Center Regional Core Comprehensive Specific Plan Draft Environmental Impact Report. December 2011, http://clkrep.lacity.org/onlinedocs/2013/13-0197_misc_b_12-1-11.pdf

3. California Public Resources Code §§21000 et seq., California Environmental Quality Act (CEQA)

4. Title 14, California Code of Regulations, Sections 15000 et seq.; State CEQA Guidelines Section 15152(a) through (f)

5. City of Los Angeles, Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan, Adopted August 17, 1999, https://planning.lacity.org/complan/pdf/cpkcptxt.pdf

6. City of Los Angeles, Ordinance No. 182766, Warner Center 2035 Plan, Approved by Los Angeles City Council October 23, 2013, https://planning.lacity.org/complan/specplan/pdf/WarnerC.pdf

7. City of Los Angeles, L.A. CEQA Thresholds Guide. 2006

8. Los Angeles Municipal Code (LAMC), Sections 91.8104, 93.0117, 99.05.504, 99.04.504, 112.02, 17.12, 6.2.3.2

9. City of Los Angeles, Ordinance No. 183147, Warner Center Supplemental Sign District Ordinance, Approved by Los Angeles City Council July 7, 2014, https://planning.lacity.org/complan/othrplan/SignDistricts/Ordinances/183147.pdf

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