

I. Executive Summary

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Supplemental Environmental Impact Report (Supplemental EIR) contains a brief summary of Promenade 2035 Project (the Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft Supplemental EIR. Also included in this section of this Draft Supplemental EIR is an overview of the purpose and focus of this Draft Supplemental EIR, a general description of the Project and proposed entitlements, a description of the organization of this Draft Supplemental EIR, an overview of the Project, a general description of areas of controversy, a description of the public review process for this Draft Supplemental EIR, and a summary of the alternatives to the Project evaluated in this Draft Supplemental EIR.

1. Purpose of this Draft Supplemental EIR

As described in Section 15123(a) and 15362 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft Supplemental EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft Supplemental EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Supplemental EIR" as defined by Section 15163 of the CEQA Guidelines. Furthermore, this Draft Supplemental EIR complies with Section 15064 of the CEQA Guidelines which discusses determining the significance of the environmental effects caused by a project.

2. Preparation of a Supplemental EIR

The Project proposes the redevelopment of the existing Westfield Promenade Shopping Center (Project Site) located within the Warner Center 2035 Specific Plan

(Warner Center Plan¹) area of the City of Los Angeles (City) with a new mixed-use development consisting of residential, retail/restaurant, office, hotel, and entertainment uses (Project).

The City certified a programmatic environmental impact report (EIR) to evaluate the potential environmental impacts of approving the Warner Center Plan in 2013. The Warner Center Plan EIR evaluated the anticipated development within the Warner Center Plan area, including the anticipated development on the Project Site.² However, because the Warner Center Plan EIR evaluated the Warner Center Plan's impacts on a programmatic level, the Warner Center Plan EIR did not examine certain construction and operational impacts that are specific to the Project.

Based on the Warner Center Plan EIR's analysis and pursuant to the conditions set forth in CEQA Guidelines sections 15162 and 15163, the City has prepared the following Draft Supplemental EIR to evaluate the Project-specific environmental impacts. For each substantive impact area, the Draft Supplemental EIR describes and relies on the analysis in the Warner Center Plan EIR to the extent that analysis evaluates the Project's potential environmental impacts. Next, for each substantive impact area where the Warner Center Plan EIR did not address the Project's specific impacts, the Draft Supplemental EIR provides in-depth supplemental analysis of the Project-specific construction and operational impacts. The Draft Supplemental EIR relies on and incorporates the applicable and feasible mitigation measures from the Warner Center Plan EIR, and also lists the Warner Center Plan EIR mitigation measures that do not apply to the specific Project.³ The Draft Supplemental EIR further provides project-specific mitigation measures that would also be implemented as part of the Project. To ensure the City thoroughly evaluated the Project's specific impacts, the Draft Supplemental EIR provides in-depth supplemental analysis of the Project-specific impacts and the feasible mitigation measures that will mitigate those impacts.⁴

¹ *The Warner Center Plan EIR referred to the Warner Center Plan as WCRCCSP. This is reflected in the mitigation measures throughout the Draft Supplemental EIR. For purposes of this Draft Supplemental EIR, Warner Center Plan and WCRCCSP are used synonymously.*

² *A copy of the certified programmatic EIR for the Warner Center Plan can be found at www.planning.lacity.org/EIR/WarnerCntrRegionalCore/FEIR/WarnerCenter_FEIR.pdf.*

³ *The mitigation measures incorporated by the Draft Supplemental EIR were taken from the Warner Center Plan EIR Mitigation Monitoring Program (MMP), dated June 2012, www.planning.lacity.org/EIR/WarnerCntrRegionalCore/FEIR/WarnerCenter_FEIR.pdf.*

⁴ *Notwithstanding impacts identified for this Project, the Warner Center Plan EIR adopted overriding considerations should the transportation improvements identified in Appendix E of the Warner Center Plan not be implemented by the horizon year of the plan, 2035.*

3. Draft Supplemental EIR Focus and Effects Found Not To Be Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft Supplemental EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, and other interested parties on November 9, 2016 for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft Supplemental EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft Supplemental EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Aesthetics (including views, light/glare, and shading)⁵
- Air Quality
- Cultural Resources (including historical resources and archaeological resources related to buried human remains)
- Greenhouse Gas (GHG) Emissions
- Hazards and Hazardous Materials
- Hydrology, Surface Water Quality, and Groundwater
- Land Use
- Noise
- Population, Housing, and Employment
- Public Services (including police protection, fire protection, schools, libraries, and parks and recreation)
- Traffic, Access, and Parking

⁵ *Analysis of biological resources with regard to tree preservation is included in Section IV.A, Aesthetics, View, Light/Glare, and Shading of this Draft Supplemental EIR.*

- Tribal Cultural Resources
- Utilities and Service Systems (including water supply and infrastructure, wastewater, and solid waste)
- Appendix F—Energy Conservation

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to scenic resources; agricultural and forestry resources; objectionable odors; sensitive or special status species; riparian habitat or other sensitive natural communities; federally protected wetlands; native resident or migratory fish or wildlife species; provisions of an adopted Habitat Conservation Plan, and Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan; archaeological resources; paleontological resources; geology and soils; hazardous emissions within one-quarter mile of an existing or proposed school; airport or airstrip-related hazards; wildland fires; placement of housing or structures within a 100-year flood plain; inundation as a result of dam failure, seiche, tsunami, or mudflow events; physical division of an established community; conflict with an adopted habitat conservation plan or natural community conservation plan; mineral resources; airport- and airstrip-related noise; displacement of housing or people necessitating the construction of replacement housing elsewhere; and changes in air traffic patterns. Therefore, these areas were not analyzed in this Draft Supplemental EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A of this Draft Supplemental EIR.

4. Draft Supplemental EIR Organization

This Draft Supplemental EIR is comprised of the following sections:

- I. **Executive Summary.** This section describes the purpose of this Draft Supplemental EIR, Draft Supplemental EIR focus and effects found not to be significant, Draft Supplemental EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.
- II. **Project Description.** This section describes the project location, existing conditions, Project objectives, and characteristics of the Project.
- III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built within the Project vicinity.

- IV. Environmental Impact Analysis.** This section contains the environmental setting, project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: aesthetics (views, light/glare, and shading); air quality; cultural resources (historical resources and archaeological resources related to buried human remains); greenhouse gas emissions; hazards and hazardous materials; hydrology, surface water quality, and groundwater; land use; noise; population, housing, and employment; public services (police protection, fire protection, schools, parks and recreation, and libraries); traffic, access, and parking; tribal cultural resources; utilities and service systems (water supply and infrastructure, wastewater, and solid waste); and analysis of CEQA Guidelines Appendix F (energy conservation).
- V. Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project including: 1) No Project/No Build Alternative; 2) No Project/Base Maximum Development in Accordance with the Warner Center Plan Alternative; 3) Reduced Density Alternative; 4) Studio Mixed-Use Development Alternative; and 5) Reduced Entertainment and Sports Center Seating Alternative (Option 1—10,000 Seats and Option 2—7,500 Seats).
- VI. Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.
- VII. References.** This section lists the references and sources used in the preparation of this Draft Supplemental EIR.
- VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft Supplemental EIR.
- IX. List of Preparers.** This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft Supplemental EIR.

This Draft Supplemental EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A—Initial Study, Notice of Preparation (NOP), and NOP Comment Letters
 - Appendix A.1—Initial Study
 - Appendix A.2—Notice of Preparation (NOP)
 - Appendix A.3—NOP Comment Letters
- Appendix B—Lighting Technical Report
- Appendix C— Tree Report
- Appendix D—Air Quality and Greenhouse Gas Technical Appendix
 - Appendix D.1—Air Quality and Greenhouse Gas Emissions Methodology
 - Appendix D.2—Construction Information (Including Overlapping Construction Plan)
 - Appendix D.3—Air Quality Worksheets and Modeling Output Files
 - Appendix D.4—Greenhouse Gas Worksheets and Modeling Output Files
 - Appendix D.5—Air Quality Modeling Output Files for Alternatives
- Appendix E—Historic Resource Technical Report
- Appendix F— Archaeological Resources Records Search
- Appendix G—Environmental Assessment Technical Reports
 - Appendix G.1—Phase I Environmental Site Assessment
 - Appendix G.2—Soils and Groundwater Investigation
 - Appendix G.3—Document Review and Screening-Level Assessment
- Appendix H—Water Resources Technical Report
- Appendix I—Noise
 - Appendix I.1—Noise Calculations: Methodology and Worksheets
 - Appendix I.2—Project Site Sound Propagation Test
 - Appendix I.3—Noise Worksheets for Alternatives

- Appendix J—Outdoor Occupancy Data
- Appendix K—Employee Estimate for Entertainment and Sports Center
- Appendix L—Public Service Letters
- Appendix M—Traffic
 - Appendix M.1— Los Angeles Department of Transportation Traffic Assessment Letters
 - Appendix M.2—Transportation Impact Study
 - Appendix M.3—Interim Phase 3 Conditions for Promenade 2035
 - Appendix M.4—Caltrans Analysis
 - Appendix M.5—List of Warner Center Plan Mitigation Measures Related to Traffic
 - Appendix M.6—Alternatives Traffic Data
- Appendix N—Tribal Cultural Resources
 - Appendix N.1—Tribal Cultural Resources Technical Report
 - Appendix N.2—AB 52 Notification Letters
 - Appendix N.3—AB 52 Response Letters
 - Appendix N.4—AB 52 Completion of Consultation
- Appendix O—Promenade Water Supply Assessment
- Appendix P— Utility Infrastructure Technical Report: Water, Wastewater, and Energy
- Appendix Q—Energy Calculations
- Appendix R—Seismic Evaluation
- Appendix S—Review of Seismic Strengthening Recommendations
- Appendix T—Avian Surveys Memo

5. Existing Project Site Conditions

The approximately 34-acre Project Site is currently occupied by the Shopping Center. The 634,142-square-foot, Shopping Center building is centered on the Project Site and is largely surrounded by surface parking areas on all sides with frontage along Erwin Street, Owensmouth Avenue, Oxnard Street, and Topanga Canyon Boulevard. A stand-alone one-story restaurant building currently occupied by P.F. Chang's and comprising 7,022 square feet is also located on the Project Site just south of the Shopping Center building. The uses within the Project Site together comprise 641,164 square feet.⁶ The existing low rise buildings range in height from 25 feet to up to 50 feet. In total, 2,530 surface parking spaces are located on-site.

Landscaping within and surrounding the Project Site is limited to trees and shrubs throughout the surface parking areas, along the adjacent roadways, and around some building perimeters.

6. Description of the Proposed Project

a. Project Overview

The Project includes the redevelopment of the existing Shopping Center with a new multiple phase, mixed-use development consisting of residential, retail/restaurant, office, hotel, and entertainment uses. Upon completion of the Project, the Project Site would include a total of 3,271,050 square feet of floor area. The Project would specifically include up to 1,432 multi-family residential units, approximately 244,000 square feet of retail/restaurant uses, approximately 629,000 square feet of office space (including both large floor-plate creative office as well as more traditional high-rise office), up to 572 hotel rooms within two hotels (272 rooms and 300 rooms, respectively), and an Entertainment and Sports Center approximately 320,050 square-feet and 15,000 seats in size. The proposed uses would be provided in several buildings throughout the Project Site that would range in height from one-story retail and three- to four-story creative office at the corner of Topanga Canyon Boulevard and Erwin Street, to a 28-story office tower at the opposite corner of Owensmouth Avenue and Oxnard Street.

⁶ *The existing shopping center buildings are comprised of 641,164 square feet of floor area. In accordance with CEQA, credit for the entirety of these uses as the environmental baseline under CEQA is appropriate given the nature of a shopping center occupancy to fluctuate over time. However, to provide a conservative analysis and consistent with LADOT established practices for trip credits, 546,794 square feet of existing floor area is used to evaluate potential impacts within this Draft Supplemental EIR as this reflects the amount of floor area that was in active use during the past two years.*

At buildout, the Project would remove 641,164 square feet of existing floor area and construct 3,271,050 square feet of new floor area, resulting in a net increase of 2,629,886 square feet of new floor area within the Project Site. A summary of the proposed development is provided in Table I-1 on page I-10.

As previously described, the Project would be developed in multiple phases (seven subphases) with buildout of the Project anticipated to be complete in 2033.

b. Project Program

As described above, the Project Site encompasses the approximately 34-acre site of the Shopping Center that is bounded by Erwin Street to the north, Owensmouth Avenue to the east, Oxnard Street to the south, and Topanga Canyon Boulevard to the west. The Project includes a variety of uses within specific geographical areas of the Project Site, based on adjacent uses, and which would be connected and integrated via internal streets and pedestrian pathways. These areas of the Project Site are described below.

(1) Northeast Area

The northeast portion of the Project Site (the “Northeast Area”) would consist of two mixed-use buildings with residential, work-live units, and ground-level retail. The northerly residential building (Northeast–A) would include approximately 320 residential units within one building ranging in height from seven stories to 15 stories (85 feet to 180 feet in height). Two-level work-live units are also proposed, with the work areas on the ground-level and the living areas located above on the second floor. This building would include approximately 350,000 square feet of residential uses and approximately 34,000 square feet of the non-residential “work” portion of the work-live units on the ground-level. Additionally, approximately 7,000 square feet of ground-level, local-serving retail uses would be located at the corner of Erwin Street and Owensmouth Avenue, including within the Warner Center Plan’s designated Activity Node at that corner.⁷ Northeast–A would include a six-level, above-grade parking structure providing approximately 560 parking spaces and a landscaped residential amenity deck on the roof of the parking structure. The parking structure would be centrally located and entirely screened from view by the proposed ground-level non-residential uses, as required by the Warner Center Plan, and the surrounding residential uses.

⁷ “Activity Node” is defined by the Warner Center Plan as an activity focal point located at the intersection of streets where pedestrian-serving uses are concentrated.

**Table I-1
Summary of Existing and Proposed Floor Area^a**

Use	Existing	Proposed Demolition	Proposed Construction	Net New
Retail	641,164 sf	641,164 sf	244,000 sf	(397,164) sf
Residential	0	0	1,545,000 sf of residential 64,000 sf of non-residential ^b 1,432 units	1,545,000 sf of residential 64,000 sf of non-residential ^b 1,432 units
Office	0	0	629,000 sf	629,000 sf
Hotel	0	0	469,000 sf 572 rooms	469,000 572 rooms
Entertainment	0	0	320,050 sf 15,000 seats	320,050 sf 15,000 seats
Total	641,164 sf	641,164 sf	3,271,050 sf	2,629,886 sf

sf = square feet

^a *Square footage is calculated pursuant to the Los Angeles Municipal Code (LAMC) definition of floor area for the purpose of calculating FAR. LAMC Section 12.03 defines floor area as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”*

^b The “work” portions of work-live units, as specified under the Warner Center Plan.

Source: Johnson Fain, 2018.

The southerly residential building within the Northeast Area (Northeast–B) would include approximately 326 residential units within one building ranging in height from seven stories to 15 stories (85 feet to 180 feet in height). This building would similarly include work-live units on the ground-level. The building would include approximately 340,000 square feet of residential uses and approximately 30,000 square feet of the non-residential “work” portion of the work-live units. Additionally, approximately 14,000 square feet of ground-level retail uses are proposed. At the center of Northeast–B would be a six-level, above-grade parking structure providing approximately 580 parking spaces, with a landscaped residential amenity deck on the roof of the parking structure. The parking structure would be centrally located and entirely screened from view by the proposed ground-level non-residential uses, as required by the Warner Center Plan, and the surrounding residential uses.

Private outdoor open space for residents within the Northeast Area would be provided through balconies and landscaped amenity decks, each of which would be approximately 1 acre in size. These amenity decks, which would be located at the roof level of each proposed parking structure within the Northeast Area, would include pool

areas, seating and eating spaces, and other amenities. Ground-level open spaces open to the public would also be provided within the Northeast Area, including landscaped areas referred to herein as the Gardens. Each of the landscaped Gardens would be approximately 11,000 square feet in size. Each residential building would also include indoor amenities, such as fitness centers and lounges.

(2) Northwest Area

The northwest portion of the Project Site (the “Northwest Area”) would provide a fully integrated mixed-use area with residential, retail, hotel, and office uses. The westerly buildings in this area (Northwest–A), fronting Erwin Street to the north and Topanga Canyon Boulevard to the west, would include approximately 114,000 square feet of creative, large-floor plate office uses in two buildings, with approximately 62,000 square feet of retail uses within the first floors of both office buildings. An approximately 209,000-square-foot, 272-room hotel would also be located along Topanga Canyon Boulevard.

The easterly building in this area (Northwest–B) would include approximately 417 residential units within one residential building with approximately 85,000 square feet of retail uses at the ground-level of the residential building. The retail uses are anticipated to include a grocery store, which is proposed on the northern end of the residential building.

The Northwest Area would feature transitional heights ranging from one-story retail uses (35 feet in height) and an 18-story hotel (230 feet in height) along Topanga Canyon Boulevard to three- and four-story creative office uses (55 feet to 85 feet in height) along Erwin Street and behind the retail and hotel uses fronting Topanga Canyon Boulevard. Behind the proposed retail, office, and hotel uses would be the residential building, which would range in height from seven to 18 stories (90 feet to 210 feet in height). A total of approximately 1,800 parking spaces would be provided in the Northwest Area, within two levels of subterranean parking and six levels of above grade parking wrapped by non-residential uses at the ground-level and residential uses above. A limited number of surface parking spaces would also be provided along Topanga Canyon Boulevard specifically for valet. The proposed retail, office, and hotel uses would be concentrated along the main street frontages with the proposed residential uses located internally.

A number of roofdeck amenity areas would be provided. The residential building would include approximately one acre of private outdoor, landscaped open space with pool areas within the amenity decks. The hotel would also include a roofdeck with a pool. In addition, both creative office buildings are anticipated to have adjoining roofdecks located on top of the adjacent one-story retail.

(3) Southwest Area

The southwest area of the Project Site (the “Southwest Area”) would include the development of an Entertainment and Sports Center approximately 320,050 square-feet and 15,000 seats in size. Adjoining the Entertainment and Sports Center would be a three-story office building comprising approximately 43,000 square feet. Below the office building would be a three-story parking structure providing approximately 290 parking spaces. Approximately 23,000 square feet of retail would wrap the Entertainment and Sports Center and parking structure at the ground-level, and architectural treatments would screen the parking structure on the east side. Specifically, the vertical surfaces of the Entertainment and Sports Center are proposed to be clad in glass, potentially with large pivot doors at key entry points, and may be augmented by vertical fins that provide sun protection and give relief to the length of the facades.

The Entertainment and Sports Center is proposed to be a flexible space that could accommodate a variety of entertainment uses, from major events to community gatherings. Events envisioned for this space include professional, youth, and community sports; live music, concerts, and performing arts; and fairs and exhibitions. The Entertainment and Sports Center could be as large as 15,000 seats but would be designed to include flexible seating that could accommodate smaller gatherings. The Project includes the option for constructing the Entertainment and Sports Center with or without a roof, and the Project’s environmental analysis analyzes whichever option has greater environmental impacts for each issue area, to provide a conservative analysis. The proposed two-level roof would be 155 feet tall at its highest, which would accommodate the heights required of all major sports (with the exception of baseball, which would require the Entertainment and Sports Center to be unroofed). The roof would step down in height over the seating areas, transitioning to a lower roof line along the Topanga Canyon Boulevard and Oxnard Street frontages (58 feet along the northern portion of the building to 85 feet along the southern portion of the building), consistent with adjacent buildings. The building’s main pedestrian entrances are proposed at the corner of Topanga Canyon Boulevard and Oxnard Street; midway along the Project’s Topanga Canyon Boulevard frontage at the northwest corner of the building; and from the center of the Project Site at the northeast corner of the building. The entries are proposed to include transparent façades providing open views into and through the building. Visitors entering from Topanga Canyon Boulevard would walk inside at the second level of the building and look down at the main floor. The opening on the northeast corner would provide indoor/outdoor transition space between the Entertainment and Sports Center’s interior and Promenade Square, the adjacent open space area that includes approximately 60,000 square feet of open space. Other entries may also be available.

(4) Southeast Area

The southeast area of the Project Site (the “Southeast Area”) would include a residential building with approximately 369 residential units and approximately 34,000 square feet of retail uses. The proposed residential building would range in height from seven stories to 28 stories (100 feet to 336 feet in height) and would be located above the ground-level retail uses. The residential building would wrap a six-story parking structure on three sides. The parking structure would provide approximately 350 parking spaces. The eastern side of the parking structure would be screened by architectural elements above the ground-level retail and the top of the parking structure would be hidden beneath an approximately 28,000 square foot landscaped amenity deck.

An approximately 260,000-square-foot, 300-room hotel, ranging in height from five stories to 19 stories (81 feet to 260 feet in height), would be located along Owensmouth Avenue, with ground-level retail along the public street. The hotel’s first floor would include hotel uses and retail uses. Above these uses would be a four-story parking structure with approximately 230 parking spaces. The parking structure would be wrapped on three sides by hotel uses. The western side of the parking structure would be screened by architectural elements. A ballroom and an approximately 36,000-square foot amenity deck would be located above the parking structure. The Project’s tallest component would be an office tower approximately 472,000 square feet in size, located at the corner of Owensmouth Avenue and Oxnard Street, reaching 28 stories and 502 feet in height. This corner is also a Warner Center Plan designated Activity Node, and retail is proposed to line the ground floor of the office building along both Owensmouth Avenue and Oxnard Street. In total, approximately 53,000 square feet of retail is proposed in the Southeast Area.

In addition to the above grade parking structures described above, parking within the Southwest and Southeast Areas of the Project Site is also anticipated to be provided in subterranean parking below the proposed uses. Specifically, approximately 1,400 parking spaces may be provided in two subterranean parking levels below the Entertainment and Sports Center with an additional approximately 530 parking spaces provided in two levels of subterranean parking in the Southeast Area, for a total of approximately 1,930 below grade parking spaces. All subterranean parking would be connected. Alternatively, if two levels of subterranean parking are not constructed in the Southwest Area, then five levels of subterranean parking would be constructed in the Southeast Area totaling approximately 1,800 parking spaces. For each issue area, the Draft Supplemental EIR will conservatively analyze the option with the potential for greater environmental impacts.

The overall design of the southern portion of the Project Site is oriented around Promenade Square, proposed as a gathering place for residents and visitors. All buildings would have contiguous frontage along the private street.

c. Access, Circulation, and Parking

Consistent with the Warner Center Plan's requirements to break up Warner Center's large blocks, the Project includes two New Streets⁸ (as defined in the Warner Center Plan, Section 4, Definitions) connecting three public street frontages. Promenade Boulevard, an east-west New Street, connects at the mid-block through the center of the Project Site from Topanga Canyon Boulevard to Owensmouth Avenue. A north-south New Street called Warner Drive North nearly bisects the northern half of the Project Site at Erwin Street.

Additional private streets are proposed within the Project Site, which would further break up the blocks. Warner Drive South is a north-south street proposed at the mid-block of Oxnard Street connecting to Promenade Boulevard. Mews Lane is an east-west street connecting Owensmouth Avenue to Warner Drive North. West Lane is a north-south street on the west side of Erwin Street, connecting Erwin Street and Promenade Boulevard. Circle Drive is also proposed to connect between Oxnard Street and Owensmouth Avenue around the office building and next to the hotel proposed within the southeast area of the Project Site. Each of these private streets could be closed to vehicular traffic at times, to allow the streets to become pedestrian-only areas. For instance, during events at the Entertainment and Sports Center, Warner Drive South may be closed to allow pedestrians to easily walk between Promenade Square and the Entertainment and Sports Center.

The Project would meet the parking requirements of the Warner Center Plan. The Project proposes 1,432 parking spaces for the proposed 1,432 units, which provides one parking space per unit, meeting the Warner Center Plan's requirements. However, each of the buildings with residential uses would contain parking spaces beyond the residential requirements of the Warner Center Plan for use by the Entertainment and Sports Center, which could also be used by Project residents and guests when small-scale or no events are occurring at the Entertainment and Sports Center.

The Project proposes 448 parking spaces for approximately 244,000 square feet of retail space, which would provide two parking spaces per 1,000 square feet, meeting the requirements of the Warner Center Plan. Likewise, the Project proposes 629 parking spaces for approximately 629,000 feet of office uses, meeting the Warner Center Plan's requirement of one parking space per 1,000 square feet of office use. For hotels, the LAMC requires a different parking rate based on the number of hotel rooms proposed. The Project proposes to provide parking for the hotel uses consistent with LAMC

⁸ "New Streets" are defined by the Warner Center Plan as a network of private streets, which are publicly accessible and must intersect the public street system. In accordance with Section 6.2.5.2.1(i) of the Warner Center Plan, open public access and right of travel would be provided at all times.

§12.21.A.4.(b), which requires one parking space for each individual guest room or suite of rooms for the first 30; one additional parking space for each two guest rooms or suites of rooms in excess of 30 but not exceeding 60; and one additional parking space for each three guest rooms or suites of rooms in excess of 60. This would result in a parking requirement of 241 parking spaces for 572 hotel guest rooms. However, the Project would include 429 parking spaces within two hotels, which results in an excess of 188 parking spaces above Code requirements. The excess parking spaces would be available for the Entertainment and Sports Center use.

The Project would provide 2,800 parking spaces above the parking required under the Warner Center Plan and LAMC for the non-Entertainment and Sports Center uses. These parking spaces would be used to meet the Entertainment and Sports Center's required parking during events. All of the Project's parking areas would be managed by a single parking operator, and the Project's subterranean parking may be connected underground such that parking from anywhere on the Project Site could be used to accommodate events at the Entertainment and Sports Center.

When no events are taking place, or smaller events are occurring which do not utilize all the on-site parking available to the Entertainment and Sports Center, the additional parking spaces on-site would be available to the other users, like shoppers and residential guests. For events requiring parking above the on-site supply of 2,820 parking spaces for the Entertainment and Sports Center, shared parking is requested to allow event visitors to use other on-site parking spaces (i.e. available office or retail spaces) when not in use. For parking demand needed beyond this for the largest events, and consistent with the Warner Center Plan, off-site parking is requested to utilize the parking spaces located in the immediate vicinity of the Project Site. The Applicant would be required to provide annual evidence to the Los Angeles Department of Transportation (LADOT) of agreements that identify/secure the location and quantity of available off-site parking for review and approval.

With regarding to bicycle parking, the Project would meet the City's bicycle code requirements. Based on the City's current requirements, the Project would provide 361 short-term and 1,726 long-term bicycle parking spaces.⁹

⁹ *Required bicycle parking spaces per land use are as follows: 1,591 residential bicycle parking spaces (145 short-term spaces and 1,446 long-term spaces), 192 bicycle parking spaces for office uses (64 short-term spaces and 128 long-term spaces), 246 bicycle parking spaces for retail uses (123 short-term and long-term spaces each), and 58 bicycle parking spaces for the hotel use (29 short-term and long-term spaces each)*

d. Landscaping and Open Space

The Project's street frontages would meet all the requirements of the Warner Center Plan, both with regard to the types of new trees planted and the pedestrian connections. New street trees consistent with the Warner Center Plan would be planted along all four streetscapes, and new parkways and sidewalks would be constructed.

As previously described, at the center of the Project Site would be Promenade Square. Promenade Square would provide approximately 60,000 square feet (approximately 1.5 acres) of open space area. Promenade Square could be used for a variety of functions, including open-air concerts, farmers markets, and other civic events. In addition to providing space for large gatherings, seating areas for smaller day-to-day gatherings would also be provided around the borders of Promenade Square, with rows of trees providing shade and framing this space. There would also be a landscaping connection to the Entertainment and Sports Center, and a proposed zero curb for Warner Drive South. This would allow the forecourt of the Entertainment and Sports Center and Promenade Square to function as a cohesive indoor/outdoor area for events. The Project's residential and hotel buildings would be located adjacent to Promenade Square, allowing residents and guests to walk outside directly into a large park space. The Project would meet the Warner Center Plan's Publicly Accessible Open Space requirement.

Publicly available open spaces are also proposed next to the residential buildings in the Northeast Area. Two street-facing courtyards, referred to as the Gardens, would be created next to Warner Drive North. The Gardens would total approximately 22,000 square feet of landscaped space. Architectural shade canopies would be created at the front of the courts, with a lawn, soft decomposed granite seating area, and amenities proposed.

A smaller plaza area is also proposed on the south side of the Northwest Area. From this plaza, a retail street (West Lane) runs to the north. The street would have parkways planted with drought tolerant grasses and trees. Large canopy trees would scale with the buildings and allow views beneath to the retail frontage as well as seating below.

Landscaped roof decks are proposed within the Northwest, Northeast, and Southeast portions of the Project Site. Trees and landscaping are proposed on the edge of these decks to allow the greenery to be seen and experienced from the ground level. Amenity roof decks are proposed for the residential buildings, which would include pools, outdoor dining areas, landscaped park spaces, and shaded seating areas. The northern creative office buildings are proposed to have adjacent outdoor roof decks, allowing people to easily walk outside to eat lunch or bring meetings outdoors. These outdoor areas would include shade structures. Both hotels would also provide elevated outdoor spaces for guests and visitors and are proposed to include pools, seating areas, and other amenities.

e. Lighting and Signage

Lighting on the Project Site would include low-level interior lighting adjacent to buildings, parking structures, surface parking areas, and along pathways for security and wayfinding purposes. In addition, lighting to accent signage, architectural features, and landscaping elements would be installed throughout the Project Site. On-site exterior lighting would be shielded or directed toward the areas to be lit to limit light spillover onto off-site uses and would meet all applicable LAMC lighting standards.

Signage on the Project Site would be consistent with the Warner Center Plan and Warner Center Supplemental Sign Ordinance and designed to be compatible with the existing and proposed architecture of the Project. New signage would be architecturally integrated into the design of the buildings and would establish appropriate identification for the proposed uses. Project signage would include monument signage, building, and general ground level and wayfinding pedestrian signage. Digital signage is also requested consistent with the Project Site's location in the Downtown District of the Warner Center Plan. Other signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. Exterior lights would be directed onto signs to minimize off-site glare. In accordance with the LAMC, illumination used for Project signage would be limited in light intensity to avoid negative lighting impacts to the nearest residentially zoned property.

f. Sustainability Features

The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. This Transit Oriented Development would be located adjacent to a major public transit hub, including a stop for the new Warner Center circulator which connects to Metro's Orange Line, and would develop multiple uses, including housing, office, retail, entertainment, and open space, in one location.

"Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to meet the standards of LEED Silver or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features. Specifically, the Project would incorporate, but not be limited to, the following features to support and promote environmental sustainability: Energy Star appliances; plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code; weather-based irrigation system; and water-efficient landscaping. In addition, the Project would also provide photovoltaic panels on the Project Site, except where roof top amenities preclude

installation of photovoltaic panels. Furthermore, the Project would provide parking facilities capable of supporting future electric vehicle supply equipment (EVSE) as well as parking spaces equipped with electric vehicle (EV) charging stations and/or outlets for plug-in.

The Project would include measures to capture and reuse rainwater for irrigation and landscaping; reduce energy usage through a variety of measures including passive solar building design¹⁰, daylight harvesting, natural ventilation, and building orientation; cover the top floors of the parking structures with open space, vegetation or amenities; and cover building roofs with either vegetation or cool roof systems to help reduce energy use. Stormwater treatment would occur through a variety of means based on the adjacent building requirements. Large cisterns to harvest rainwater would be paired with water treatment swales and detention basins. All basins would be designed into the landscape, as part of the overall public realm design.

The Project would comply with the Solar Reflectance Index requirement in the Warner Center Plan Appendix G through the selection of Option 3. Excluding areas reserved for photovoltaic panels, mechanical equipment, and appurtenances, the buildings would include both cool/reflective and green/vegetated roofing surfaces such that the weighted average of the total roof area would mitigate heat island effect.

7. Project Construction and Phasing

The Project is anticipated to be constructed in multiple phases, over a period of 15 years (2019–2033), with buildout of the Project completed in 2033. A description of each phase of the Project is summarized in Table I-2 on page I-19, and described below. The Project’s phasing plan is intended to describe the geographic area covered by each phase of the Project, with the order of buildout of these geographic phases subject to change depending on market conditions. In addition, the phases of the Project have the potential to overlap. For the purpose of providing a conservative analysis of potential construction impacts for the Draft Supplemental EIR, construction assumptions were developed for the maximum potential overlap of construction phases (the “Overlapping Construction Plan”). The Overlapping Construction Plan assumes that the Northeast, Northwest, and Southwest areas of the Project Site would be constructed as close in time as feasible, to provide a peak scenario of potential construction impacts. Throughout the Project’s Draft Supplemental EIR, the overlapping of phases are analyzed for those issue areas where such an occurrence would result in greater environmental impacts in order to provide a conservative analysis.

¹⁰ *In passive solar building design, windows, walls, and floors are made to collect, store, and distribute solar energy in the form of heat in the winter and reject solar heat in the summer.*

**Table I-2
Project Phasing—New Construction^a**

	Floor Area (sf)
Northeast–A (2021)	
Residential	350,000 (320 units)
Non-Residential/Retail	41,000 ^b
<i>Total Northeast–A</i>	<i>391,000</i>
Northeast–B (2021)	
Residential	340,000 (326 units)
Non-Residential/Retail	44,000 ^c
<i>Total Northeast–B</i>	<i>384,000</i>
Northwest–A (may include north and south phases) (2024)	
Retail	62,000
Hotel	209,000 (272 rooms)
Office	114,000
<i>Total Northwest–A</i>	<i>385,000</i>
Northwest–B (2024)	
Residential	480,000 (417 units)
Retail	85,000
<i>Total Northwest–B</i>	<i>565,000</i>
Southwest (2027)	
Retail	23,000
Office	43,000
Entertainment and Sports Center	320,050
<i>Total Southwest</i>	<i>386,050</i>
Southeast (2033)	
Residential	375,000 (369 units)
Retail	53,000
Hotel	260,000 (300 rooms)
Office	472,000
<i>Total Southeast</i>	<i>1,160,000</i>
Overall Total	3,271,050
<p>^a The Project's phasing plan is intended to describe the geographic area covered by each phase of the Project. The buildout year identified in this table shows one potential order of buildout of these geographic phases, subject to change depending on market conditions. In addition, the phases of the Project have the potential to overlap.</p> <p>^b The non-residential 41,000 square feet includes approximately 34,000 square feet of "work" areas on the ground-level of the work/live units, and approximately 7,000 square feet of ground-level retail.</p> <p>^c The non-residential 44,000 square feet includes approximately 30,000 square feet of "work" areas on the ground-level of the work/live units, and approximately 14,000 square feet of ground-level retail.</p> <p>Source: Johnson Fain, 2018.</p>	

To provide for development of the Project, demolition of the existing Shopping Center (with the exception of AMC Theatres, the former location of the Rack, and the stand-alone building currently occupied by P.F. Chang's) would occur either as the first part of Project construction or at an earlier point in time. However, to be conservative, the analysis included in the Draft Supplemental EIR would assume demolition would occur as part of the Project. If demolition occurs earlier, then the Macy's building would remain until demolition of the building is approved with the Project's requested Project Permit. The areas of the Shopping Center that are demolished would be used for temporary construction staging.

Once demolition occurs, the Project is anticipated to proceed with development of the Northeast Area of the Project Site, beginning with the northerly building, and then proceed in a counterclockwise order through the Project Site, to the Northwest Area, then the Southwest Area, then the Southeast Area. However, this order is subject to change based on market conditions.

The Project includes the option to either construct one to two levels of subterranean parking in the Southwest Area, which would be constructed with development of the Southwest Area, or alternatively construct five levels of subterranean parking in the Southeast Area, which would be constructed when that area is developed.

As stated above, if two levels of subterranean parking are not constructed in the Southwest Area, then five levels of subterranean parking would be constructed in the Southeast Area. Thus, under a worse-case scenario, the Project may require excavation up to 75 feet¹¹ below ground surface in the Southeast Area, with shallower excavation in the Northwest and Southwest areas. It is estimated that approximately 1,430,000 cubic yards of export and 344,000 cubic yards of import may be hauled from the Project Site over the Project's entire buildout; less export may be needed if multiple phases are constructed at the same time and the soil can be kept on site. Construction hours would occur Monday through Saturday in accordance with the LAMC. Construction hours could extend beyond these hours if required and specifically permitted by the City. The haul route to and from the Project Site is anticipated to be primarily traveling south on Topanga Canyon Boulevard to the Ventura Freeway (US-101) or north on Topanga Canyon Boulevard (SR-27) to the Ronald Reagan Freeway (SR-118), if traveling south on Topanga Canyon Boulevard is infeasible.

¹¹ *The depth of excavation provided in the Initial Study (62 feet) varies from what is included in the Draft Supplemental EIR (75 feet), as the depth of excavation provided in the Draft Supplemental EIR is the depth required for construction of the proposed subterranean levels and their foundation elements whereas the depth of excavation provided in the Initial Study is the depth required for construction of the proposed subterranean levels only.*

8. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project as the lead agency. Approvals required for development of the Project include, but are not limited to, the following:

- Certification of a Supplemental EIR to the Warner Center Plan EIR;
- Project Permit Compliance for Multiple Phase Project, Master Planned Project, Entertainment Use, Signage, Shared Parking and Off-Site Parking for the Entertainment and Sports Center during events, and Incentive uses¹²;
- Director's Interpretation for requested size 15,000-seat of Entertainment and Sports Center;
- Master Alcohol Conditional Use Permit for on-site and off-site alcohol sales;
- Three Vesting Tentative Tract Maps, including haul route and removal/relocation of protected trees and street trees; and
- Parcel Map Exemption to permit lot line adjustments of existing lot lines.

In addition to the specific discretionary actions listed above, other discretionary and ministerial permits and approvals may be or will be required, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and Caltrans approval.

9. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant unavoidable impact has been identified. These areas may include regional air quality impacts during construction and operation of the Project, historical resources, vibration impacts from off-site construction with respect to human annoyance, impacts from off-site operational noise, and traffic impacts during construction and operation of the Project. There were also several comments related to other environmental issues provided to the City in response to the NOP. Based on the NOP comment letters provided in Appendix A,

¹² *Incentive uses include: (1) a grocery store that has at least 7,500 square feet of floor area and is located within a mixed-use building or structure; and (2) five or more Local-Service Retail business, all of which are located on the first floor.*

of this Draft Supplemental EIR, issues known to be of concern included, but were not limited to, Project impacts on air quality; hazards; noise; population, housing, and employment; public services; traffic; tribal cultural resources; and utilities and service systems. Refer to Appendix A of this Draft Supplemental EIR for copies of the NOP comment letters.

10. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on November 9, 2016, for a 30-day review period. In addition, a public scoping meeting was conducted on November 29, 2016. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft Supplemental EIR.

This Draft Supplemental EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final Supplemental EIR will be prepared that will include responses to the comments raised regarding this Draft Supplemental EIR.

11. Summary of Alternatives

This Draft Supplemental EIR examined five alternatives to the Project in detail, which include the No Project/No Built Alternative, the No Project/Base Maximum Development in Accordance with the Warner Center Plan Alternative, the Reduced Density Alternative, the Studio Mixed-Use Development Alternative, and the Reduced Entertainment and Sports Center Seating Alternative (Option 1—10,000 Seats and Option 2—7,500 Seats). A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft Supplemental EIR for a more detailed description of these alternatives and a comparative analysis of the impacts of these alternatives with those of the Project.

Alternative 1: No Project/No Build Alternative

Alternative 1, the No Project Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the 634,142-square-foot, two-story Shopping Center building, the stand-alone one-story restaurant building comprising 7,022 square feet, and the 2,530 surface parking spaces would remain on the Project Site, and no new construction would occur. The existing tenants with long-term leases (AMC Theaters and P.F. Chang's) would remain in operation until the expiration of their existing leases.

Alternative 2: No Project/Base Maximum Development in Accordance with the Warner Center Plan

Alternative 2, the No Project/Base Maximum Development in Accordance with the Warner Center Plan Alternative, considers development of the Project Site in accordance with the parameters set forth in the Warner Center Plan. Specifically, Alternative 2 would include the development of 3,588 residential units, 357,350 square feet of retail, and 3,250,650 square feet of office uses. Overall, Alternative 2 would construct 7,196,000 square feet of new floor area (an increase of 3,924,950 square feet compared to the Project). Alternative 2 illustrates the base maximum FAR of 5:1 permitted within the Downtown District of the Warner Center Plan, and includes residential and non-residential uses in percentages consistent with the graduated FAR table in Appendix B of the Warner Center Plan.

Alternative 3: Reduced Density Alternative

Alternative 3, the Reduced Density Alternative, would reduce the FAR of the Project to 1.75, specifically by reducing the residential and office uses proposed. Alternative 3 proposes the development of up to 1,063 residential units (a reduction of 369 units compared to the Project), approximately 244,000 square feet of retail/restaurant uses, approximately 157,000 square feet of office space (a reduction of approximately 472,000 square feet compared to the Project), up to 622 hotel rooms (634,000 square feet), and an Entertainment and Sports Center with 15,000 seats. Overall, the Reduced Density Alternative would construct 2,525,050 square feet of new floor area (a reduction of 745,950 square feet compared to the Project). This accounts for a 25-percent reduction in density as compared to the Project.

Alternative 4: Studio Mixed-Use Development Alternative

Alternative 4, the Studio Mixed-Use Development Alternative, is an alternative use and reduced density scheme that would construct a studio and mixed-use project with up to 552 residential units, and approximately 1,619,000 of office uses, which include 587,000 square feet of studio uses. This alternative would not include the hotel uses or the Entertainment and Sports Center proposed by the Project. Overall, the Studio Mixed-Use Development Alternative would construct 2,376,000 square feet of new floor area, which is a reduction of 895,000 square feet compared to the Project. This accounts for a 30-percent reduction in density as compared to the Project.

Alternative 5: Reduced Entertainment and Sports Center Seating Alternative (Option 1—10,000 Seats and Option 2—7,500 Seats)

Alternative 5, the Reduced Entertainment and Sports Center Seating Alternative (Option 1—10,000 Seats and Option 2—7,500 Seats), would construct a mixed-use project similar to the Project. However, the number of seats in the Entertainment and Sports Center would be reduced. Specifically, this alternative analyzes a 10,000-seat Entertainment and Sports Center (Option 1) and a 7,500-seat Entertainment and Sports Center (Option 2). In total, the Project would include up to 1,432 residential units, approximately 244,000 square feet of retail/restaurant uses, approximately 629,000 square feet of office uses, up to 572 hotel rooms, and an approximately 320,050-square-foot Entertainment and Sports Center. While this alternative analyzes a reduction in seating provided in the Entertainment and Sports Center, the building area of the Entertainment and Sports Center under Alternative 5 is assumed to be the same as that proposed under the Project for the Entertainment and Sports Center. This would provide for a variety of smaller seating areas within the same building. Similar to the Project, Alternative 5 would construct 2,629,886 square feet of net new floor area.

12. Summary of Environmental Impacts and Mitigation Measures

Table I-3 on page I-25 provides a summary of the environmental impacts of the Project. These impacts are summarized as follows:

**Table I-3
Summary of Impacts Under the Project**

Environmental Issue	Proposed Project Impact ^a
A. AESTHETICS, VIEWS, LIGHT/GLARE, AND SHADING	
Aesthetics	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Views	Less Than Significant
Light/Glare	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Shading	Less Than Significant
B. AIR QUALITY	
Construction	
<i>Regional Emissions</i>	Significant and Unavoidable
<i>Local Emissions</i>	Less Than Significant with Mitigation
<i>Toxic Air Contaminants</i>	Less Than Significant
Operation	
<i>Regional Emissions</i>	Significant and Unavoidable
<i>Local Emissions</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	Less Than Significant
C. CULTURAL RESOURCES	
Historical Resources	Significant and Unavoidable
Archaeological Resources (Buried Human Remains)	Less Than Significant with Mitigation
D. GREENHOUSE GAS EMISSIONS	
	Less Than Significant
E. HAZARDS AND HAZARDOUS MATERIALS	
Construction	Less Than Significant
Operation	Less Than Significant
F. HYDROLOGY, SURFACE WATER QUALITY, AND GROUNDWATER	
Surface Water Hydrology	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Surface Water Quality	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Groundwater Hydrology	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Groundwater Quality	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

Table I-3 (Continued)
Summary of Impacts Under the Project

Environmental Issue	Proposed Project Impact ^a
G. LAND USE	
Land Use Consistency	Less Than Significant
Land Use Compatibility	Less Than Significant
H. NOISE	
Construction	
<i>On-Site Noise</i>	Significant and Unavoidable
<i>Off-Site Noise</i>	Less Than Significant
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant
<i>On-Site Vibration (Human Annoyance)</i>	Less Than Significant
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant
<i>Off-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable
Operation	
<i>On-Site Noise</i>	Less Than Significant
<i>Off-Site Noise</i>	Significant and Unavoidable
I. POPULATION, HOUSING, AND EMPLOYMENT	
Population	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Housing	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Employment	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
J. PUBLIC SERVICES	
Police Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Fire Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Schools	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Parks and Recreation	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

Table I-3 (Continued)
Summary of Impacts Under the Project

Environmental Issue	Proposed Project Impact ^a
Libraries	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
K. TRAFFIC AND ACCESS	
Construction	Significant and Unavoidable
Operation	
<i>Intersection Levels of Service</i>	Less Than Significant With Mitigation ^b
<i>Regional Transportation System</i>	Less Than Significant
<i>Neighborhood Street Segments</i>	Significant and Unavoidable
<i>Access and Circulation</i>	Less Than Significant
<i>Bicycle, Pedestrian, and Vehicular Safety</i>	Less Than Significant
<i>Parking</i>	Less Than Significant
L. TRIBAL CULTURAL RESOURCES	Less Than Significant With Mitigation
M. UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY AND INFRASTRUCTURE	
Water Supply and Infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Wastewater	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Solid Waste	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
N. APPENDIX F—ENERGY CONSERVATION	
Construction	Less Than Significant
Operation	Less Than Significant
<p>^a Based on the analyses included in this Draft Supplemental EIR, the following cumulative impacts would be significant and unavoidable: cumulative regional air quality impacts during construction; cumulative regional air quality impacts during operation; cumulative on- and off-site construction noise impacts to off-site receptors; cumulative noise impacts from off-site construction vibration related to the significance threshold for human annoyance; cumulative off-site noise impacts during operation when there are sold-out events at the Entertainment and Sports Center; cumulative construction traffic impacts; and cumulative traffic impacts to neighborhood street segments during operation. All other cumulative impacts would be less than significant or less than significant with mitigation.</p> <p>^b As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the impacts for operation of Phases 1–3 (interim) conditions would result in significant Project and cumulative impacts in the event that the Warner Center Plan improvements are not implemented by operation of Phases 1–3.</p> <p>Source: Eyestone Environmental, 2018.</p>	

A. Aesthetics, Views, Light/Glare, and Shading

a. Analysis of Project Impacts

The Project is a multiple phase, mixed-use development which is entirely within 0.5 mile of a major transit stop (i.e., the adjacent Warner Center Transit Hub along Owensmouth Avenue), and meets Public Resources Code Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. Therefore, the Project is located in a transit priority area pursuant to Senate Bill (SB) 743 and as defined by Zoning Information File 2452 (ZI 2452).¹³ As such, pursuant to SB 743 and ZI 2452, the Project's aesthetic impacts shall not be considered a significant impact on the environment. Nevertheless, the following aesthetics analysis is provided for informational purposes.

(1) Aesthetics

(a) Construction

During construction activities for the Project, the visual appearance of the Project Site would be altered due to the removal of the existing on-site buildings, surface parking areas, trees and landscaping. As discussed in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft Supplemental EIR, to provide a conservative analysis, the Macy's building is considered a visual resource for the purposes of this analysis. Accordingly, the removal of the Macy's building is assume to result in the loss of a unique visual resource.

The removal of the existing on-site and street trees would temporarily reduce the visual character of the Project Site and surrounding streets during construction of the Project. However, these trees would either be relocated or replaced, and by buildout, the Project would provide at least 600 trees within the Project Site, an increase of 308 trees over existing conditions. The street frontages surrounding the Project Site would also benefit from a greater number of trees, as well as enhanced parkways, pedestrian paths, and trees/landscaping consistent with the Warner Center Plan. Given that the Project would improve the streetscape in the Project area, and all on-site and street trees would be replaced and added to, the removal of on-site and street trees during construction would not substantially and adversely alter or degrade the existing visual character of the Project Site.

¹³ A phone conversation with Claire Bowin, Senior City Planner, Policy Division, on July 20, 2017 confirmed that the Project Site qualifies as a site located in a Transit Priority Area.

Other construction activities, including site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of the building foundations and proposed structures, would also temporarily alter the visual character and quality of the Project Site and adjacent roadways. These construction activities could be visible to pedestrians and motorists on adjacent streets, as well as to viewers within nearby buildings. However, the appearance of the Project Site during construction would be typical of construction sites in urban areas. In addition, in accordance with Project Design Feature A-2, provided above, temporary construction fencing would be installed along the periphery of the Project Site to screen much of the construction activity from view at the street level. In addition, as set forth in Project Design Feature A-3, pedestrian walkways and construction fencing accessible to the public would be monitored for graffiti removal throughout the construction period. Furthermore, construction activities would be temporary in nature, and the temporary change in the visual character and quality of the Project Site and surrounding area associated with construction activities at the Project Site would cease upon completion of the Project.

Visible construction activities would also include truck traffic to and from the Project Site. However, the impact of construction trucking would not significantly impact the visual character of the area, since major roadways are intended to accommodate a range of vehicle types, including trucks incidental to construction and deliveries.

Based on the above, with the exception of removal of the Macy's building, construction activities associated with the Project would not substantially and adversely alter or degrade the existing visual character of the Project Site, nor introduce elements that substantially detract from the visual character of the Project Site or surrounding area on a permanent basis. In addition, in accordance with SB 743, aesthetic impacts during construction of the Project would not be considered significant.

(b) Operation

The Project Site is currently developed with buildings, surface parking areas, and landscaping. These uses currently within the Project Site do not contribute to the valued visual character or image of the surrounding community. The visual character of the Project Site is that of an underutilized site with freestanding buildings and large expanses of surface parking. The Project would visually alter the Project Site by removing the existing structures and introducing a new mixed-use development that would include residential, retail/restaurant, office, hotel, and entertainment uses that would be integrated by landscaped pedestrian walkways and landscaped pedestrian-oriented open space, creating a unified site. As discussed in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft Supplemental EIR, the existing Macy's building was considered to be an historical resource. Therefore, the Macy's building is conservatively considered a visual resource for the purposes of this analysis because of its historical significance.

Accordingly, the removal of the Macy's building would result in the loss of a unique visual resource.

With regard to the visual character of the surrounding uses, the Project's uses would be compatible with the existing retail/restaurant uses of the Village at Westfield Topanga and the additional retail, restaurant, and office uses along Erwin Street. The Project would also be compatible with other high-rise office uses across the Project Site, along Oxnard Street and Owensmouth Avenue. The height of the Project's various mixed-use buildings would be compatible with the existing character of the area by locating the proposed buildings adjacent to existing buildings of similar scale. The proposed heights would not create a substantial contrast in the context of the varied low-, mid-, and high-rise developments that characterize the Warner Center area. The varying heights throughout the Project Site would create a gradual visual transition from the Project's lower buildings to the Project's taller buildings. Furthermore, the site-wide variation in heights would add to the multi-faceted skyline in the Warner Center area, thereby providing visual interest. The Project would also incorporate variations in building planes to reduce the effect of massing and provide a pedestrian scale within and adjacent to surrounding public streets.

The Project would also improve the visual character and quality of the existing Project Site by replacing existing asphalt paved surface parking areas, which currently do not contribute to the valued visual character of the area, with new buildings integrated by a variety of landscaped areas, as set forth in Warner Center Plan Mitigation Measure AES-1, and streetscape improvements. The Project's street frontages would meet all the requirements of the Warner Center Plan, both with regard to the types of new trees planted and the pedestrian connections, including parkways and sidewalks.

Other Project elements that contribute to the visual character include signage. The Project would incorporate signage consistent with the signage regulations of the LAMC and the Warner Center Plan, including the signage restrictions set forth in Warner Center Plan Mitigation Measure AES-4 through Warner Center Plan Mitigation Measure AES-8. Signage along the street frontages would be of a proper scale to motorists and pedestrians. In addition, signage would be visually integrated with the proposed development on the Project Site and would further add visual interest and texture to building façades. The Project would comply with the applicable design regulations, including the location of signs, size of signs, sign illumination, and types of signage.

In summary, the Project's height, design, massing, and scale would be compatible with the existing uses that set the aesthetic character of the vicinity. Notwithstanding, the Project would result in the removal of the Macy's building, an historical resource, which is conservatively considered an aesthetic resource for purposes of this analysis. However, in accordance with SB 743, this impact would not be considered significant.

(2) Views

Existing valued views within the greater Project area could include focal views and panoramic views or vistas of identified visual resources. However, as shown in the visual simulations, such views are limited, mostly obscured by existing intervening urban features, and generally intermittent in the vicinity of the Project Site. Scenic vistas of visual resources in the vicinity of the Project Site are further limited due to the predominantly flat terrain of the vicinity and the intervening development that blocks long-range, expansive views.

Visual resources within and in the vicinity of the Project Site that are available from public view locations include views of the Macy's building, an historical resource; views of the Guy Martin Oldsmobile and Livingston Pontiac building, located across the Project Site at 6133 North Topanga Canyon Boulevard, which is considered a visual resource for the purposes of this analysis because of its historical significance; views of the Allison Plaza Historic District, which is bounded by Oxnard Street to the north, Canoga Avenue to the east, and Califa Street to the south; views of the Santa Susana Mountains and the Santa Monica Mountains in the distant backdrop; collective views of the distinctive high-rise buildings that make up the Warner Center skyline from near view locations; and panoramic views of the Warner Center skyline, from distant locations.

The Project would remove the Macy's building, which is considered an historical resource and a visual resource. Therefore, its removal is conservatively considered the loss of a recognized view.

With regard to focal north-facing views, the Project would partially obstruct focal north-facing views of portions of the Santa Susana Mountains along Topanga Canyon Boulevard and along Owensmouth Avenue. However, the obstruction of the view would be limited and the majority of the view would remain. Therefore, the reduction in publicly-available intermittent views of the Santa Susana Mountains that would result from the Project would not be considered a substantial obstruction of existing views of these visual resources. From longer range views, the Project would appear to contribute to the existing views of the urban environment.

East-facing views of the Guy Martin Oldsmobile and Livingston Pontiac building, located across the Project Site at 6133 North Topanga Canyon Boulevard, are available from Erwin Street. However, the Project would be located east of the building and would not obstruct views of the Guy Martin Oldsmobile and Livingston Pontiac building. From other east-facing locations, the Project would visually fill-in the Project Site and would appear consistent and compatible with other similarly sized buildings in the vicinity of the

Project Site. Therefore, the Project would not have the potential to block east-facing views of other visual resources in the area.

With regard to focal south-facing views, while the Project would partially obstruct existing views of one of the office towers that comprise the Warner Center towers, views of the majority of the office campus would remain. In addition, the Project's high-rise buildings would contribute to the existing setting from this view by locating the taller components of the Project adjacent to the existing high-rise buildings that comprise the Warner Center skyline. The Project would not block south-facing views of other visual resources in the area.

West-facing views of the Santa Susán Mountains would be predominately maintained. Furthermore, while the Project would partially obstruct existing views of one of the office towers that comprise the Warner Center towers, views of the majority of the office campus would remain. In addition, the Project's high-rise buildings would contribute to the existing setting from this view by locating the taller components of the Project adjacent to the existing high-rise buildings that comprise the Warner Center skyline.

Based on the analysis above, the Project would eliminate existing views of the Macy's building, an historical resource. No other valued views would be eliminated or obstructed by the Project. As noted above, SB 743 provides that aesthetic impacts do not include impacts on historical or cultural resources. As such, this impact would not be considered significant. The Project's impacts associated with the removal of the Macy's building, which is considered an historical resource, have been fully analyzed in Section IV.C, Cultural Resources, of this Draft Supplemental EIR.

(3) Light and Glare

(a) Construction

Lighting needed during construction of the Project has the potential to generate light spillover to off-site sensitive land uses in the vicinity of the Project Site, including the residential uses directly northeast of the Project Site. However, construction activities would occur in accordance with the hours of LAMC Section 41.40. Additionally, as identified in Warner Center Plan Mitigation Measure AES-9 below, construction lighting would be shielded and/or aimed so that no direct beam illumination would fall outside of the Project Site boundary. Therefore, with adherence to existing LAMC regulations and Warner Center Plan Mitigation Measure AES-9, light resulting from construction activities would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be transitory and short-term, and large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Additionally, as set forth in Project Design Feature A-2, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations.

Based on the above analysis, light and glare associated with construction of the Project would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area.

(b) Operation

The analysis of light and glare is based in part on the Lighting Technical Report (Lighting Report) prepared by Francis Krahe & Associates, Inc. dated March 8, 2017. The Project would include lighting from within the interior of Project buildings, as well as lighting at the building exterior elevations, exterior plazas, and roof decks. In addition, since the Entertainment and Sports Center may include an open roof or closed roof, both options were analyzed in the Lighting Report. The Lighting Report also analyzed lighting from Project signage.

To provide a conservative analysis, the Lighting Report conservatively assumed the simultaneous use of all Project-related building and site lighting and assumed all signs would be operating at the maximum luminance level permitted by the Warner Center Sign District. Actual Project operations would likely generate lower illuminance and/or luminance than the lighting that has been modeled in the Lighting Report.

As discussed in the Lighting Report, the illuminance (light trespass) associated with Project lighting with an open roof for the Entertainment and Sports Center at the calculated vertical planes at the centerline of the public streets adjacent to each Project frontage would range from 0.0 foot-candle to up to 0.7 foot-candle. The LAMC's lighting threshold of 2.0 foot-candles is measured at the property line of the nearest sensitive receptor. Thus, since Project-related illuminance levels associated with building and site lighting would be below the 2.0 foot-candle threshold at the adjacent public right-of-way, the illuminance from the Project at the residential receptor sites would be substantially lower and impacts from Project building and site lighting would, therefore, be less than significant.

With regard to illuminance associated with Project illuminated signage, illuminated signage would generate a maximum of 0.3 foot-candles at the vertical planes at the property lines of the closest sensitive residential receptors. Thus, Project-related

illuminance associated with illuminated signage would be well below the 3.0-foot-candle significance threshold and would, therefore, be less than significant. In addition, as set forth below, the Project would comply with the applicable mitigation measures set forth in the Warner Center Plan EIR regarding lighting. Implementation of these mitigation measures would further reduce the Project's less-than-significant lighting impacts.

The Project building and site lighting, as well as signage, was analyzed in comparison to the existing average measured light levels to determine the amount of glare/contrast that would be generated. The resulting contrast levels are considered low and would not introduce a new source of glare. Thus, potential impacts associated with glare/contrast related to Project lighting and signage would be less than significant. In addition, the Project would comply with the mitigation measures set forth in the Warner Center Plan EIR to address glare from proposed buildings, signage, and lighting, which would further reduce the Project's less-than-significant glare impacts.

Based on the above, lighting and glare associated with Project operation would not substantially alter the character of off-site areas surrounding the Project Site. Impacts from Project-related sources of artificial light and glare during operation would be less than significant.

(4) Shading

As shown in the shadow diagrams provided in Section IV.A, Aesthetics, Views, Light and Glare, and Shading, of this Draft Supplemental EIR, the off-site areas shaded by the Project during the winter solstice, the spring equinox, the summer solstice, and the fall equinox would not include potentially routinely useable outdoor spaces associated with shadow sensitive uses. Therefore, shading impacts during the fall would be less than significant.

(5) Consistency with Regulatory Framework

As detailed in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft Supplemental EIR, the Project would be consistent with applicable goals, objectives, and policies in the City of Los Angeles General Plan Framework Element (Framework Element), the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan, the Warner Center Specific Plan, and the Los Angeles Municipal Code (LAMC) that relate to aesthetics. Overall, the Project would be consistent with applicable regulatory standards and policies that relate to aesthetics.

b. Cumulative Impacts

As indicated in Section III, Environmental Setting, of this Draft Supplemental EIR, there are 29 related projects in the vicinity of the Project Site. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, office, hotel, and institutional developments.

(1) Aesthetics

There are two related projects that are located sufficiently close to the Project Site to enter the same field of view as the Project. With respect to visual quality and character, the nearby related projects represent infill development and would be similar to or smaller in scale than the Project and generally representative of the existing urban environment and character in the area. In addition, similar to the Project, future developments, including the related projects, would be subject to the City's design review processes and discretionary review to ensure consistency with adopted guidelines and standards that address aesthetics. As evaluated in Section IV.C, Cultural Resources, of this Draft Supplemental EIR, none of the related projects in the area include the removal of potentially historic mid-20th century department stores such as the Macy's building proposed for removal within the Project Site. As such, cumulative impacts would be less than significant.

(2) Views

As with the Project, views of other off-site visual resources, including architectural or historically significant structures, could be affected by the related projects. Given the location of related projects to the Project Site and the identified potential historical resources in the vicinity of the Project Site, no significant cumulative impacts to views of visual resources would occur. Thus, cumulative impacts would be less than significant.

(3) Light and Glare

The Project and nearby related projects would include typical land uses for the Project area, would not significantly alter the existing lighting environment currently experienced in the area. Furthermore, the Project and related project would be required to adhere to applicable City requirements regarding lighting and signage. The Project and other future development projects would be subject to discretionary review to ensure that significant sources of glare are not introduced and that, as with the Project, related projects would include standard design features related to use of low-level lighting and shielding, as well as use of non-reflective surfaces to minimize the potential for glare. Therefore, the Project's contribution to light and glare impacts would not be cumulatively considerable, and cumulative light and glare impacts from development of the Project and the related projects would be less than significant.

(4) Shading

Given the location, distance, and pattern of shadows of Related Project Nos. 15 and 27, these related projects would not shade the same uses as the Project. Therefore, the Project would not combine with related projects to result in shading impacts to shadow-sensitive uses. Therefore, cumulative impacts would be less than significant.

c. Project Design Features

The following project design features are proposed with regard to aesthetics and light/glare:

Project Design Feature A-1: The Project would replace all protected trees at a ratio of 4:1.

Project Design Feature A-2: Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity from view at the street level.

Project Design Feature A-3: The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

Project Design Feature A-4: On-site utility connections that may be required to serve the Project will be installed underground, where feasible.

Project Design Feature A-5: Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning systems), as well as building appurtenances, will be integrated into the Project's architectural design or screened from view from public rights-of-way.

Project Design Feature A-6: Trash areas associated with the proposed buildings will be enclosed or otherwise screened from view from public rights-of-way.

Project Design Feature A-7: Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

d. Mitigation Measures

In accordance with SB 743, Project-level and cumulative impacts with regard to aesthetics, views, light and glare, and shading would be less than significant, and no mitigation measures are required. Nonetheless, the mitigation measures set forth in the Warner Center Plan EIR, as applicable and as listed below, would be implemented as part of the Project. As noted below, Warner Center Plan Mitigation Measure AES-5 of the Warner Center Plan EIR is not applicable to the Project as the Project does not have existing billboard signs on-site. Warner Center Plan Mitigation Measure AES-21 and Warner Center Plan Mitigation Measure AES-26 of the Warner Center Plan EIR would not be implemented as those mitigation measures have been superseded by the requirements of the Warner Center Sign District, which the Project would comply with. Warner Center Plan Mitigation Measure AES-28 is a general mitigation measure to ensure individual development projects conduct project-specific analyses. The analyses included in this section fulfill the requirements of Warner Center Plan Mitigation Measure AES-28. As such, Warner Center Plan Mitigation Measure AES-28 is not applicable.

Warner Center Plan Mitigation Measure 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 decisionmaker.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure AES-4: Multiple temporary signs in the store windows and along the building walls are not permitted.

~~**Warner Center Plan Mitigation Measure AES-5:** By issuance of a building permit for signage, for every Digital Display each Applicant or its successor shall remove or cause to have removed one billboard for each Digital Display.~~

[This mitigation measure is not applicable to the Project.]

Warner Center Plan Mitigation Measure AES-6: A building permit for a new Digital Display sign shall not be issued until any prohibited signs, on such parcel, have been removed.

Warner Center Plan Mitigation Measure AES-7: All signs in the WCRCCSP 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

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

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

Warner Center Plan Mitigation Measure AES-11: Lighting of individual projects shall comply with LAMC Section 93.0117. As such, lighting shall not cause more than 2 foot-candles of lighting intensity or direct glare from the light source at any residential property.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

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

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure AES-18: All displays shall have a wattage draw not to exceed 12 watts/sq. ft. to meet Title 24 2008 requirements.

Warner Center Plan Mitigation Measure AES-19: All displays shall be fully dimmable, and shall be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day. Displays shall also include an automatic light level meter, with the intensity of the illumination not to exceed 0.3 foot-candle above ambient light levels, in addition to the other illumination restrictions of these mitigations.

Warner Center Plan Mitigation Measure AES-20: All displays shall have a maximum total lumen output of no more than 20 lumens per square foot.

~~**Warner Center Plan Mitigation Measure AES-21:** Digital signage shall not exceed 100 feet above grade.~~

[This mitigation measure is not applicable to the Project.]

Warner Center Plan Mitigation Measure AES-22: Digital displays shall include an automatic light sensor/meter to ensure that illumination levels do not exceed 0.3 foot-candle above ambient light levels.

Warner Center Plan Mitigation Measure AES-23: During daytime hours all digital displays will have a brightness less than 3,500 candelas/m².

Warner Center Plan Mitigation Measure AES-24: All digital displays shall transition smoothly at a consistent rate of speed from the permitted daytime brightness to the permitted nighttime brightness levels, beginning at 45 minutes prior to sunset and concluding the transition to nighttime brightness 45 minutes after sunset. Where applicable, they shall also transition smoothly at a consistent rate of speed from the permitted nighttime brightness to the permitted daytime brightness levels, beginning 45 minutes prior to sunrise and concluding the transition to daytime brightness 45 minutes after sunrise.

Warner Center Plan Mitigation Measure AES-25: All light emitting diodes used within any digital display shall have a horizontal beam spread of

maximum 165 degrees wide and 65 degrees vertically. All light emitting diodes shall be generally oriented downwards to the street, rather than up towards the sky.

~~**Warner Center Plan Mitigation Measure AES-26:** All signs using animation or that otherwise change shall be restricted. Each applicant shall submit a study to the Department of City Planning documenting proposed refresh rates and compliance with the SUD.~~

[This mitigation measures is not applicable to the Project.]

Warner Center Plan Mitigation Measure 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.

~~**Warner Center Plan Mitigation Measure 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.~~

[This mitigation measures is not applicable to the Project.]

In addition, the following Warner Center Plan EIR and Project-specific mitigation measures would ensure that trees proposed for removal would be replaced in accordance with applicable requirements.

Warner Center Plan Mitigation Measure BIO-2: For development in the Specific Plan area the City shall require replacement of 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.

Mitigation Measure A-1: Street trees to be removed that are under the jurisdiction of the City of Los Angeles shall be replaced to the satisfaction of the City of Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division through measures that may include one or more of the following:

- 2:1 replacement of removed street trees;

- 1:1 replacement of removed street trees with new trees on-site that are of comparable size to the removed street trees;
- replacement at an off-site location in the vicinity or at the Bureau of Street Services' nursery; and/or
- payment of an in-lieu fee.
- Street trees shall be planted with species/cultivars listed in Figures 1-12 of the Warner Center Plan.

Mitigation Measure A-2: Street trees to be removed under the jurisdiction of Caltrans shall be replaced to the satisfaction of Caltrans.

e. Level of Significance After Mitigation

In accordance with SB 743, Project-level and cumulative impacts with regard to aesthetics, views, light and glare, and shading would be less than significant.

B. Air Quality

a. Analysis of Project Impacts

(1) Construction

(a) Regional Construction Impacts

As evaluated in Section IV.B, Air Quality, of this Draft Supplemental EIR, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) without mitigation, would not exceed the South Coast Air Quality Management District (SCAQMD) daily significance thresholds for carbon monoxide (CO), sulfates (SO_x), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}). Maximum unmitigated construction emissions would exceed the SCAQMD daily significance threshold for volatile organic compounds (VOC) during 2020 and 2021 and nitrogen oxides (NO_x) during Years 2019, 2020, 2021, and 2031 primarily as a result of grading and hauling activities overlapping with building construction activities. However, with incorporation of Warner Center Plan Mitigation Measure AQ-1, regional VOC emissions would be reduced below the SCAQMD daily significance threshold and maximum regional NO_x emissions would be substantially reduced by 49 percent in Year 2019, 43 percent in Year 2020, and to less than significant in Years 2021 and 2031. Nevertheless, regional NO_x emissions would remain significant and unavoidable under the conservative Overlapping Construction Plan scenario.

In the event that soil on the Project Site is not suitable for recompaction or the Project is unable to stockpile and reuse the soil on site, then 1,430,000 cubic yards of

export and 344,000 cubic yards of import would be required and the duration and not the intensity of export/import could increase. Regional construction emissions with the additional export/import in comparison to the no import condition would decrease peak daily emissions by 5 percent for NO_x, 2 percent for CO and PM_{2.5}, and 1 percent for VOC, and increase by approximately 3 percent for PM₁₀. Construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions with the additional export/import) without mitigation would not exceed the SCAQMD daily significance thresholds for CO, SO_x, PM₁₀ and PM_{2.5}. With incorporation of Warner Center Plan Mitigation Measure AQ-1, regional VOC emissions would be reduced below the SCAQMD daily significance threshold and maximum regional NO_x emissions would be substantially reduced by 46 percent in Year 2019, 45 percent in Year 2020, and 44 percent in Year 2021, and to less than significant in Year 2022 and 2031. Nevertheless, regional NO_x emissions with the additional export/import would remain significant and unavoidable for Years 2019 through 2021.

(b) Localized Impacts from On-Site Construction Activities

As evaluated in Section IV.B, Air Quality, of this Draft Supplemental EIR, maximum localized construction emissions for off-site sensitive receptors would not exceed the SCAQMD-recommended localized screening threshold for CO. However, maximum construction emissions would exceed the SCAQMD-recommended localized screening threshold for NO_x in Years 2019–2021 and PM₁₀ and PM_{2.5} in Years 2019–2021 and 2031 primarily as a result of grading and hauling activities. With incorporation of Warner Center Plan Mitigation Measure AQ-1, maximum localized construction emissions for sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds.

In the event that soil on the Project Site is not suitable for recompaction or the Project is unable to stockpile and reuse the soil on site, then 1,430,000 cubic yards of export and 344,000 cubic yards of import would be required and the duration and not the intensity of export/import could increase. With incorporation of Warner Center Plan Mitigation Measure AQ-1, maximum localized construction emissions for sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds. The same would hold true for on-site sensitive receptors. Therefore, localized construction emissions resulting from the Project would result in a less-than-significant short-term impact with incorporation of mitigation.

(c) Toxic Air Contaminants (TAC)

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. The proximity of sensitive receptors to proposed construction

activities over a long duration would be limited since the Project is anticipated to be developed in phases. In addition, no residual emissions and corresponding individual cancer risk are anticipated after construction. Furthermore, Warner Center Plan Mitigation Measure AQ-1 requires the use of off-road diesel-powered construction equipment greater than 50 hp to meet the Tier 4 emission standards, where available. Relative to previous emissions standards, Tier 4 compliant engines reduce emissions over 95 percent for most construction equipment. Because of these factors, construction impacts associated with TAC emissions would be less than significant.

(2) Operation

(a) Regional Operational Impacts

Emissions resulting from operation of the Project at its projected buildout year of 2033 are not expected to exceed the SCAQMD's daily regional operational thresholds for CO, SO_x, PM₁₀, and PM_{2.5}. However, the Project is expected to exceed the SCAQMD's daily regional operational thresholds for VOC and NO_x. The VOC regional operational impact is primarily related to the use of consumer products (e.g., residential use of household cleaners and solvents that release VOC emissions). The NO_x regional operational impact is from vehicular trips to and from the Project site. Thus, the Project would result in a significant and unavoidable regional operational air quality impact.

(b) Localized Impacts

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. As evaluated in Section IV.B, Air Quality, of this Draft Supplemental EIR, on-site operational emissions would not exceed any of the localized significance thresholds (LSTs).

(c) CO "Hot Spots" Analysis

Consistent with the CO methodology described in Section IV.B, Air Quality, of this Draft Supplemental EIR, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

At buildout of the Project, the highest average daily trips at an intersection would be approximately 79,500 at the De Soto Avenue and Victory Boulevard intersection,¹⁴ which is significantly below the daily traffic volumes that would be expected to generate CO

¹⁴ Gibson Transportation Consulting, Inc., *Transportation Impact Study for Promenade 2035*, March 2018.

exceedances as evaluated in the 2003 AQMP.¹⁵ This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the De Soto Avenue and Victory Boulevard would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP.¹⁶ Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant. The supporting data for this analysis is included in Appendix D of this Draft Supplemental EIR.

(d) Toxic Air Contaminants Impacts Evaluation

(i) On-Site Sources

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks associated with the Project's commercial component (e.g., truck traffic on local streets and idling at loading docks). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. The SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units).¹⁷ Based on this guidance, the Project would not include these types of land uses.¹⁸ In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit diesel particulate emissions.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

¹⁵ *The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 parts per million by volume (ppm), which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.*

¹⁶ *It should be noted that CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP. In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2014.*

¹⁷ *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.*

¹⁸ *The Project includes 13 loading bays throughout the Project Site. On a typical day, each loading bay would receive three deliveries for a total of 39 deliveries across the Project Site.*

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. As such, the Project would not release substantial amounts of TACs, and impacts on human health would be less than significant.

(e) Concurrent Construction and Operational Emissions

Portions of the Project Site would be completed and occupied while construction of the later Project components would be ongoing. Therefore, concurrent construction and operational impacts were evaluated. Based on a review of the proposed Project, it was determined that the maximum concurrent emissions could potentially occur during operation of Northeast, Northwest, and Southwest areas and construction of the Southeast area (Year 2031). Regional emissions of VOC and NO_x during concurrent operations and construction without mitigation would exceed the SCAQMD regional construction thresholds. In addition, concurrent emissions would also exceed the SCAQMD localized significance thresholds for PM₁₀ and PM_{2.5}. With incorporation of Warner Center Plan Mitigation Measure AQ-1, regional VOC emissions would be reduced by 7 percent and regional NO_x emissions would be reduced by 11 percent, but would still exceed the SCAQMD daily regional significance threshold. Localized impacts would be reduced below the SCAQMD localized construction thresholds.

(3) SCAQMD CEQA Air Quality Handbook Policy Analysis

The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. While development of the Project would result in short-term regional impacts, Project development would not have a significant long-term impact on the region's ability to meet state and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of VOC and NO_x. Also, the Project would be consistent with the goals and policies of the AQMP for control of fugitive dust. The Project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

(4) City of Los Angeles Policies

The Project is consistent with applicable policies of the City of Los Angeles General Plan Air Quality Element because the Project would be designed and constructed to incorporate features to support and promote environmental sustainability and meet the standards of LEED Silver or equivalent green building standards. This transit oriented development would be located on a major public transit hub, next to the Warner Center Transit Hub, including a stop for the new Warner Center circulator which connects to

Metro's Orange Line, and would bring multiple uses, including housing, office, retail, entertainment, and open space, together in one location. As such, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle miles travelled (VMT).

b. Cumulative Impacts

(1) Construction

The Project would comply with regulatory requirements, including SCAQMD Rule 403 requirements. In addition, the Project would comply with adopted AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, all construction projects in the Air Basin-wide would comply with these same requirements (i.e., SCAQMD Rule 403 compliance) and would also implement feasible mitigation measures when significant impacts are identified.

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. Project construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) with mitigation would exceed the SCAQMD daily thresholds and consequently have a significant cumulative impact due to construction-related regional NO_x emissions.

In the event that soil on the Project Site is not suitable for recompaction or the Project is unable to stockpile and reuse the soil on site, then 1,430,000 cubic yards of export and 344,000 cubic yards of import would be required and the duration, but not the intensity of export/import, could increase. With Warner Center Plan Mitigation Measure AQ-1, the Project would still have a cumulative impact due to construction-related regional NO_x emissions.

With incorporation of Warner Center Plan Mitigation Measure AQ-1, maximum localized construction emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds.

In the event that soil on the Project Site is not suitable for recompaction or the Project is unable to stockpile and reuse the soil on site, with incorporation of Warner Center Plan Mitigation Measure AQ-1, the Project's contribution to cumulative localized NO_x

emission impacts during construction would not be cumulatively considerable and thus would have a less-than-significant cumulative impact.

The Project would result in a less-than-significant toxic emissions impact primarily because the Project would comply with Warner Center Plan Mitigation Measure AQ-1 which requires the use of off-road diesel-powered construction equipment greater than 50 hp to meet the Tier 4 emission standards. As such, the Project's contribution to cumulative toxic emission impacts during construction would not be cumulatively considerable and thus is less than significant.

(2) Operation

According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. Operational emissions from the Project would exceed SCAQMD's regional VOC and NO_x significance thresholds at Project buildout. Therefore, the emissions of non-attainment pollutants and precursors generated by Project operation would be cumulatively considerable.

With respect to TAC emissions, neither the Project nor any of the related projects, would represent a substantial source of TAC emissions, which are more typically associated with large-scale industrial, manufacturing, and transportation hub facilities. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. The Project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things, however the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Air Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the Project would not result in any substantial sources of TACs that have been identified in CARB's Land Use Guidelines and, thus, would not result in a cumulatively considerable impact or a cumulatively significant impact.

In conclusion, during construction, the Project would have a cumulative impact to regional emissions (i.e., related to NO_x emissions); however, localized and TAC emissions would not be cumulatively considerable. During operation, the Project would have a cumulative impact to regional emissions (i.e., related to VOC and NO_x emissions); however, localized, and TAC emissions would not be cumulatively considerable.

c. Project Design Features

No specific project design features are proposed with regard to air quality. The Project would incorporate project design features to support and promote environmental sustainability as discussed under Section IV.D, Greenhouse Gas Emissions, of this Draft Supplemental EIR. While these features are designed primarily to reduce greenhouse gas emissions, they also are expected to reduce criteria air pollutants. In addition, as discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, a Transportation Demand Management (TDM) Program would be developed and would include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips.

d. Mitigation Measures

The Warner Center Plan EIR contained mitigation measures to reduce construction and operational air quality impacts. Similarly, as set forth in the Warner Center Plan EIR, the following mitigation measure would be implemented as part of the Project to reduce construction and operational air quality impacts. The Project Site is not located within 0.5 mile of a school. Specifically, the nearest school to the Project Site is the Canoga Park High School, located approximately 0.79 mile from the Project Site at 6850 Topanga Canyon Boulevard, Hamlin Charter Academy, located approximately 0.93 mile from the Project Site at 22627 Hamlin Street, and Woodland Hills Academy, located approximately one mile from the Project Site at 20800 Burbank Boulevard. Therefore, Warner Center Plan Mitigation Measures AQ-10 through AQ-15 are not applicable to the Project. Further, the Project Site is located 3,100 feet from US-101. Therefore Warner Center Plan Mitigation Measure AQ-16 is not applicable to the Project. Minor modifications of the Warner Center Plan Mitigation Measures are indicated by ~~strikethrough~~ for deletions and underline for additions.

Warner Center Plan Mitigation Measure 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 and the speed on unpaved haul roads within the Project Site shall be limited to 15 miles per hour. In addition the City shall require that projects be required to include the following measures as applicable and feasible:

- i) Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- ii) Provide dedicated turn lanes for movement of construction trucks and equipment on-and off-site.

- iii) Reroute construction trucks away from congested streets or sensitive receptor areas.
- iv) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity, including resolution of issues related to PM₁₀ generation.
- v) Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.
- vi) Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113.
- vii) Construct or build with materials that do not require painting.
- viii) Require the use of pre-painted construction materials.
- ix) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export).
- x) 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 1, 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 clean up of off-road diesel vehicles, such as heavy-duty construction equipment. More information on this program can be found at the following website: www.aqmd.gov/tao/Implementation/SOONProgram.htm.
- xi) Other measures as applicable on a project by project basis and as may be recommended by SCAQMD on their web site or elsewhere: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

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

Warner Center Plan Mitigation Measure AQ-3: The City shall require that trucks leaving construction sites be washed to reduce track-out dirt and dust.

Warner Center Plan Mitigation Measure AQ-4: The City shall require that developers provide rideshare and transit incentives to construction personnel.

Warner Center Plan Mitigation Measure AQ-5: The City shall require that developers configure construction parking to minimize interference with traffic lanes.

Warner Center Plan Mitigation Measure AQ-6: The City shall require that developers and City Departments minimize the obstruction of through-traffic in the vicinity of construction sites.

Warner Center Plan Mitigation Measure AQ-7: The City shall require that developers and City Departments use flag people during construction to guide traffic properly.

Warner Center Plan Mitigation Measure AQ-8: The City shall require that construction activities that could affect roadways be scheduled for off-peak periods.

Warner Center Plan Mitigation Measure AQ-9: The City shall require that developers (as well as City construction personnel associated with construction of roadway and other infrastructure) ensure 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.

~~**Warner Center Plan Mitigation Measure AQ-10:** The City shall require that projects located within 0.5 mile 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.~~

[This mitigation measure is not applicable to the Project.]

~~**Warner Center Plan Mitigation Measure AQ-11:** The City shall ensure that projects located within 0.5 mile 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.~~

[This mitigation measure is not applicable to the Project.]

~~**Warner Center Plan Mitigation Measure AQ-12:** The City shall ensure that projects located within 0.5 mile 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.~~

[This mitigation measure is not applicable to the Project.]

~~**Warner Center Plan Mitigation Measure AQ-13:** The City shall ensure that projects located within 0.5 mile 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. If the affected LAUSD school(s) have~~

~~installed HVAC as anticipated by this measure and no additional mitigation is feasible, no fee will be required.~~

~~[This mitigation measure is not applicable to the Project.]~~

~~**Warner Center Plan Mitigation Measure AQ-14:** The City shall ensure that projects located within 0.5 mile of any LAUSD school shall submit a Construction Air Quality Management Plan (CAQMP) to the City and LAUSD that identifies any anticipated significant project-specific and/or cumulative air quality impacts on area LAUSD schools (as a result of interior respirable particulate matter defined as particles equal to or less than 2.5 microns) and defines appropriate mitigation to reduce interior particulate concentrations in potentially affected schools to a level of less than significance. The CAQMP shall include emissions calculations from anticipated construction activities and appropriate prediction of air pollutant transport, such as dispersion modeling or alternative method such as the South Coast Air Quality Management District's (SCAQMD) Localized Significance Threshold (LST) methodology, using publically available data, models, and methods. It is not required that site specific monitoring of pollutant levels or meteorological data be performed. LAUSD must compile and supply verifiable data and engineering estimates, as appropriate, including but not limited to locations and heights of operable windows and mechanical air intake systems, air exchange rates of the heating, ventilation, and air conditioning (HVAC) systems, existing air filtration data, etc. If the CAQMP identifies significant impacts, defined as a predicted incremental increase in interior PM_{2.5} levels of greater than 10.4 micrograms per cubic meters ($\mu\text{g}/\text{m}^3$) 24-hour average, then the CAQMP must include enforceable mitigation measures to lessen the impact to less than significant levels. Comments from LAUSD shall be provided to the Planning Director or his/her designee to determine the extent to which LAUSD comments shall be incorporated in to the CAQMP. The developer shall be required to provide a construction mitigation program that identifies a general schedule of construction activities including the types of machinery, duration of each activity, and the amount of grading or potential earth movement as performed on a daily basis. The program shall provide quantified evidence that proposed daily construction activities would not generate significant construction-related air quality impacts. The City shall review the CAQMPs to verify that impacts are adequately addressed and appropriate mitigation measures are required. The developer shall be required to covenant for all mitigation measures identified in the CAQMP. If the developer wishes to change an approved CAQMP within 15 days of the start of grading/site preparation, the developer shall request in writing from the Director of Planning permission for~~

~~any such changes. The Director or his/her designee shall base permission for such changes on information in the case file.~~

~~[This mitigation measure is not applicable to the Project.]~~

~~**Warner Center Plan Mitigation Measure AQ-15:** If a project were to identify potential significant interior air quality impacts at any school the developer shall provide funding (into the Warner Center Air Quality Trust Fund) for the replacement of air filters at the affected school site. Further developer shall contribute a fair share to fund air conditioners at the school to the extent that air conditioners are not present and/or are in need of replacement.~~

~~[This mitigation measure is not applicable to the Project.]~~

~~**Warner Center Plan Mitigation Measure AQ-16:** The City shall require that all projects within the WCRCCSP area that propose sensitive receptors within 500 feet of the 101 Freeway shall undertake a risk analysis to identify mitigation measures to reduce potential risks to such uses to acceptable levels (as identified by SCAQMD). To the extent that risks cannot be reduced to an acceptable level, sensitive receptors shall not be located within 500 feet of the 101 Freeway. In order to comply with the California Air Resources Board Air Quality and Land Use Handbook (June 2005) and achieve an acceptable interior air quality level for sensitive receptors, appropriate measures, shall be incorporated into project building design. The appropriate measures shall include one of the following methods:~~

- ~~a. The project applicant shall retain a qualified air quality consultant to prepare a health risk assessment (HRA) in accordance with the California Air Resources Board and the Office of Environmental Health and Hazard Assessment requirements to determine the exposure of project residents/occupants/users to stationary air quality pollutants prior to issuance of a demolition, grading, or building permit. The HRA shall be submitted to the Lead Agency for review and approval. The applicant or implementation agency shall implement the approved HRA recommendations, if any. If the HRA concludes that the air quality risks from nearby sources are at or below acceptable levels, then additional measures are not required.~~
- ~~b. The applicant shall implement the following features that have been found to reduce the air quality risk to sensitive receptors and shall be included in the project construction plans. These shall be submitted to the Planning and Zoning Division and the Building Services Division for review and approval prior to the issuance of a demolition, grading, or building permit and ongoing.~~
- ~~c. Do not locate sensitive receptors near distribution center's entry and exit points.~~

- ~~d. Do not locate sensitive receptors in the same building as a perchloroethylene dry cleaning facility.~~
- ~~e. Maintain a 50 foot buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year).~~
- ~~f. Install, operate and maintain in good working order a central heating and ventilation (HV) system or other air take system in the building, or in each individual residential unit, that meets the efficiency standard of the MERV 13. The HV system shall include the following features: Installation of a high efficiency filter and/or carbon filter to filter particulates and other chemical matter from entering the building. Either HEPA filters or ASHRAE 85 percent supply filters shall be used.~~
- ~~g. Retain a qualified HV consultant or HERS rater during the design phase of the project to locate the HV system based on exposure modeling from the mobile and/or stationary pollutant sources.~~
- ~~h. Maintain positive pressure within the building.~~
- ~~i. Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air.~~
- ~~j. Achieve a performance standard of at least 4 air exchanges per hour of recirculation~~
- ~~k. Achieve a performance standard of 0.25 air exchange per hour of unfiltered infiltration if the building is not positively pressurized.~~
- ~~l. Project applicant shall maintain, repair and/or replace HV system or prepare an Operation and~~
- ~~m. Maintenance Manual for the HV system and the filter. The manual shall include the operating instructions and maintenance and replacement schedule. This manual shall be included in the CC&R's for residential projects and distributed to the building maintenance staff. In addition, the applicant shall prepare a separate Homeowners Manual. The manual shall contain the operating instructions and maintenance and replacement schedule for the HV system and the filters. It shall also include a disclosure to the buyers of the air quality analysis findings.~~

[This mitigation measure is not applicable to the Project.]

e. Level of Significance After Mitigation

(1) Construction

Implementation of the mitigation measures described above would serve to reduce construction emissions for all pollutants. Regional VOC emissions would be reduced below

the SCAQMD daily significance threshold and maximum regional NO_x emissions would be substantially reduced by approximately 50 percent. However, peak daily regional NO_x emissions would still exceed the SCAQMD regional significance threshold for NO_x (100 pounds per day). As such, Project construction would result in significant and unavoidable Project-level and cumulative regional impacts even with incorporation of all feasible mitigation measures.

In terms of localized air quality impacts, maximum construction emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds.

No significant impacts related to TAC emissions during construction are anticipated to occur as a result of the Project. As such, potential Project-level and cumulative TAC impacts would be less than significant.

(2) Operations

Incorporation of project design features provided in Section IV.D, Greenhouse Gas Emissions, of this Draft Supplemental EIR, and relevant features applicable to the Project would decrease VOC emissions by 15 percent, NO_x emissions by 49 percent, CO emissions by 53 percent, PM₁₀ emissions by 85 percent, PM_{2.5} emissions by 84 percent, and similar amounts of SO_x. However, regional operational emissions associated with Project buildout analysis year and Interim Year would still exceed the SCAQMD daily emission threshold for regional VOC and NO_x. Thus, the Project would result in a significant and unavoidable Project-level and cumulative regional operational air quality impact.

The Project is not anticipated to include any substantial TAC emission sources. Specifically, the Project would not result in the exposure of sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0. As such, potential Project-level and cumulative impacts from Project TAC emissions would be less than significant.

(3) Concurrent Construction and Operational Emissions

Portions of the Project Site would be completed and occupied while construction of the later Project components would be ongoing. Therefore, concurrent construction and operational impacts were evaluated. Implementation of the mitigation measures described above would serve to reduce construction emissions for all pollutants. In addition, project design features provided in Section IV.D, Greenhouse Gas Emissions, of this Draft Supplemental EIR and relevant features applicable to the Project discussed above, would

decrease operational VOC emissions by 15 percent, NO_x emissions by 49 percent, CO emissions by 53 percent, PM₁₀ emissions by 85 percent, PM_{2.5} emissions by 84 percent, and similar amounts of SO_x. Concurrent emissions from the Project during operation of Northeast, Northwest, and Southwest areas and construction of the Southeast area (Year 2031) would exceed SCAQMD's construction regional VOC and NO_x significance thresholds. Therefore, the emissions of non-attainment pollutants and precursors generated by concurrent construction and operational activities would result in a significant and unavoidable impact. However, localized and TAC emissions would be less than significant with incorporation of Warner Center Plan Mitigation Measure AQ-1.

C. Cultural Resources

a. Analysis of Project Impacts

(1) Historical Resources

(a) Direct Impacts

Construction of the Project would require the demolition of all of the on-site structures, including the Macy's building, which is located in the northwest area of the Project Site. The Macy's building at the Promenade was surveyed by SurveyLA, where it was determined that the Macy's building appears to be eligible for the California Register and as a Los Angeles HCM as an example of New Formalism architecture. While the *6100 N. Topanga Boulevard Historic Resource Technical Report* (Historical Resource Assessment), prepared by Page & Turnbull (December 2016), included as Appendix E of this Draft Supplemental EIR, did not find the Macy's building to be an excellent or typical example of New Formalism, in deference to SurveyLA's findings, it concurred with the findings that the Macy's building appears to be eligible for listing in the California Register and as a Los Angeles Historic-Cultural Monuments (HCM) as an example of the New Formalism style with regional variations. Therefore, the Macy's building is considered an historical resource for the purposes of the Draft Supplemental EIR. Consequently, the demolition of the Macy's building would result in a significant impact to an historical resource. There are no other potential historical resources on the Project Site.

(b) Indirect Impacts

The Project would construct new buildings on the site that would alter the setting of the area, thereby potentially resulting in indirect impacts to historical resources in the vicinity of the Project. SurveyLA identified two potential historical resources in the general vicinity: (1) Guy Martin Oldsmobile and Livingston Pontiac Building; and (2) Allison Plaza Historic District.

The Project buildings that would be located across Topanga Canyon Boulevard from the Guy Martin Oldsmobile and Livingston Pontiac Building (in the northeast area of the Project Site) include one-story retail uses and an 18-story hotel along Topanga Canyon Boulevard. With the Project's one-story retail uses located directly across from the Guy Martin Oldsmobile and Livingston Pontiac building, the proposed new construction would be compatible in scale and massing with the potential historical resource. While the Project's 18-story hotel and the residential building would be nearby, they are sufficiently far from Guy Martin Oldsmobile and Livingston Pontiac building as not to materially impair or affect its integrity of setting.

The Project's tallest buildings would be located near the southeast corner of the Project Site, closest to the Allison Plaza Historic District. The Project's 28-story office building would be located at the corner of Owensmouth Avenue and Oxnard Street, opposite a similarly tall office building currently located at Warner Center on the south side of Oxnard Street. A hotel ranging from five to 19 stories would be located along Owensmouth Avenue and a residential building ranging from seven to 28 stories would have street frontage along Oxnard Street. The southeast area's proposed construction is in line with the density and height seen at Warner Center along Oxnard Street and west of Allison Plaza Historic District. Furthermore, as this portion of the Project is a full block away, there is sufficient distant from Allison Plaza so as not to reduce its visibility along Oxnard Street or to significantly change its setting.

Overall, the Project would not alter the surroundings of the Guy Martin Oldsmobile and Livingston Pontiac Building or the Allison Plaza Historic District to an extent that it would reduce the integrity or significant of these resources. Thus, the Project would not result in significant indirect impacts to the two historical resources.

(2) Archaeological Resources (Buried Human Remains)

The results of the records search indicate there are no archaeological sites or isolates, which are artifacts not associated with an archaeological site, located within a 0.5-mile radius of the Project Site or within the Project Site. While this does not preclude the potential for human remains to be identified during construction activities associated with the proposed Project, it is unlikely because substantial disturbance of the ground surface has previously occurred on-site. The proposed Project would require excavation to a depth of 75 feet below ground surface. Warner Center Plan Mitigation Measure CUL-3 would be implemented, which requires archaeological monitoring of grading of subsurface materials not previously disturbed to be undertaken. In addition, Warner Center Plan Mitigation Measure CUL-5 would be implemented that requires that if cultural resources are discovered during construction activities, construction work would be halted until appropriate site-specific treatment measures are implemented. Furthermore, if human

remains were discovered during construction of the proposed Project, Warner Center Plan Mitigation Measure CUL-5 would require that work in the immediate vicinity be halted immediately, the construction manager and other entities would be notified, and disposition of the human remains and any associated grave goods would also be in accordance with this mitigation measure and Public Resources Code 5097.91 and 5097.98, as amended.

With implementation of these mitigation measures, any potential impacts related to archeological resources (buried human remains) would be reduced to a less-than-significant level.

b. Cumulative Impacts

(1) Historical Resources

With no related projects in the general area impacting potentially historic mid-20th century department stores, the demolition of the Macy's building at the Promenade as part of the Project would not result in cumulative impacts. Furthermore, there are no known related projects in the vicinity that are proposing to demolish potentially historic New Formalist buildings. Therefore, the impacts of the proposed Project would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Archaeological Resources (Buried Human Remains)

With regard to potential cumulative impacts related to archaeological resources (buried human remains), the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. Mitigation measures would ensure that the Project's potential impacts to human remains would be reduced to less-than-significant levels. In addition, in the event that buried human remains are uncovered, each related project would be required to comply with applicable regulatory requirements. Furthermore, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering such resources. Therefore, cumulative impacts to archaeological resources (buried human remains) would be less than significant and would not be cumulatively considerable.

c. Project Design Features

No specific project design features are proposed with regard to cultural resources.

d. Mitigation Measures

The Warner Center Plan EIR contained mitigation measures to reduce impacts to historical, archaeological, and paleontological resources. Similarly, as set forth in the Warner Center Plan EIR, the following mitigation measure would be implemented as part of the Project to reduce impacts to historical resources and archeological resources (buried human remains). The Warner Center Plan EIR analysis indicated that no national, state, or local historical resources either eligible or potentially eligible for listing are located in the Plan area. The Certified EIR also noted that site-specific analysis will be required for individual projects and thus set forth Warner Center Plan Mitigation Measure CUL-2, below. The Historic Resource Technical Report summarized herein and included in Appendix E, fulfills Warner Center Plan Mitigation Measure CUL-2, and therefore is no longer required. Warner Center Plan Mitigation Measure CUL-1, listed below, requires that the preservation, rehabilitation, restoration, reconstruction or adaptive reuse of known historical resources shall meet the Secretary of Interior Standards to the extent feasible. The Macy's building was identified by SurveyLA as appearing eligible for listing in the California Register and as a Los Angeles HCM. Thus, it is considered an historical resource. As discussed in detail in Section V, Alternatives, of this Draft Supplemental EIR, and as further discussed in Appendix S, of this Draft Supplemental EIR, it is not feasible to retain the historical character-defining features of the Macy's building while also meeting the City of Los Angeles Ordinance No. 183893, which provides the latest earthquake building requirements for concrete, non-ductile buildings. Thus, Warner Center Plan Mitigation Measure CUL-1 would not be implemented as part of the Project; however, Mitigation Measure C-1, below, has been added to require recordation of the Macy's building prior to its removal. Warner Center Plan Mitigation Measure CUL-5 from the Certified EIR would also be implemented as part of the Project to address potential impacts associated with human remains. Finally, Warner Center Plan Mitigation Measures CUL-3 and CUL-5 would reduce impacts to archaeological resources in the form of buried human remains to a less-than-significant level. As a note, Warner Center Plan Mitigation Measures CUL-4 and CUL-6 were included as part of the Initial Study and are therefore not shown below, but will be included in the Final Supplemental EIR's Mitigation Monitoring Program. The Warner Center Plan Mitigation Measures are modified as indicated by ~~strike through~~ for deletions and underline for additions.

~~**Warner Center Plan Mitigation Measure CUL-1:** For discretionary projects in the Specific Plan area the City shall require that to the extent feasible, the preservation, rehabilitation, restoration, reconstruction or adaptive reuse of known historic resources shall meet the U.S. Secretary of the Interior's Standards for Rehabilitation. Any proposal to preserve, rehabilitate, restore, reconstruct, or adaptively reuse a known historic resource in accordance with the Secretary of the Interior's Standards shall be deemed to not be a significant impact~~

~~under CEQA and, in such cases no additional mitigation measures will be required.~~

[This mitigation measures is not applicable to the Project.]

~~**Warner Center Plan Mitigation Measure CUL-2:**For discretionary projects in the Specific Plan area the City shall require that in the event that a future development project is proposed on a site containing a potential historic property (more than 45 years in age), the City shall require, as part of the environmental review of the project, a site specific historic resources assessment to determine whether the property is a historic resource under CEQA. If the historic resources assessment determines that the potential historic property is a historic resource, the City shall undertake the analysis and impose mitigation measures required under CUL-1.~~

[This mitigation measures is not applicable to the Project.]

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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 living descendant(s). The most likely living descendant 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.

Mitigation Measure C-1: Recordation. Prior to issuance of a demolition permit for the Macy's Building, the Macy's building shall be documented to the standards of the Historic American Building Survey (HABS) program. The documentation shall include:

- Written description and narrative report following the most recent HABS Guideline for Historical Reports, Outline Format;
- High resolution black and white and color digital photographs following the most recent HABS Photography Guidelines. Views shall include the setting, important site features, all exterior façades, the Macy's building's façades within the mall, detail views of significant exterior architectural features, and interior views of significant spaces and features;
- A site plan showing the Macy's building location in relationship to the shopping mall, setting and surrounding streets; a photo key using the site plan shall be included, as well. This will be submitted in hard copy and digital format;
- Duplicates of historic photographs and drawings, if available; and
- High resolution digital copies of all historic photographs and drawings identified as part of the historic resources assessment of the property as well as others, as available.

A qualified professional who meets the requirements of the *Secretary of the Interior's Professional Qualifications Standards* for history, architectural history, or historic architecture, as well as a HABS qualified photographer, shall prepare the documentation. Upon completion, copies of the documentation materials shall be sent to City of Los Angeles Department of City Planning Office of Historic Resources. Materials shall be posted in digital format on HistoricPlacesLA, the City's Historic Resources Inventory and Management System. In addition, copies of the documentation materials shall be offered and sent if requested to appropriate archives and repositories, including the Southern California Information Center at Cal State University, Fullerton; Los Angeles Public Library Central Library and/or local branch as appropriate; the University of Southern California Library, Special Collections; California State University, Northridge; the Museum of the San Fernando Valley; and local preservation organizations and historical societies.

e. Level of Significance after Mitigation

As analyzed above, impacts to historical resources would be significant due to the demolition of the Macy's building, which appears eligible for listing on the California Register of Historical Resources and designation as a City of Los Angeles Historic-Cultural Monument. While implementation of Mitigation Measure C-1 would record and document the building's design, Project impacts to historical resources would remain significant and unavoidable. Cumulative impacts on historical resources would be less than significant.

D. Greenhouse Gas Emissions

a. Analysis of Project Impacts

The Project would generate an incremental contribution to and cumulative increase in sources of GHGs. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. Thus, potential GHG impacts are addressed generally as a cumulative impact for environmental review purposes. When taking into consideration implementation of project design features provided throughout this Draft Supplemental EIR, including the requirements set forth in the City of Los Angeles Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project in 2033 would equal 1,513 MTCO₂e per year during construction and 10,225 MTCO₂e per year during operation of the Project with a combined total of 11,738 MTCO₂e per year. In addition, when comparing the Project GHG emissions with the calculated efficiency target for 2033, the Project would emit 1.67 metric tons per year CO₂e per service population. This is lower than the calculated efficiency target for 2033 (2.6 metric tons per year CO₂e per service population), further demonstrating the Project's consistency with AB 32's 2020 target and SB 32's 2030 target and establishing consistency with the Scoping Plan and other applicable plans and policies adopted to reduce GHG emissions in accordance with AB 32 and SB 32.

As discussed in detail in Section IV.D, Greenhouse Gas Emissions, of this Draft Supplemental EIR, the Project would be consistent with the *Climate Change Scoping Plan*, the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), and the *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan). Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and Project-specific impacts with regard to climate change would be less than significant.

b. Cumulative Impacts

The analysis of a project's GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. The analysis shows that the Project is consistent with the *Climate Change Scoping Plan*, the 2016–2040 RTP/SCS, and the LA Green Plan. In addition, when comparing the Project GHG emissions with the calculated efficiency target for 2033, the Project would emit 1.67 metric tons per year CO₂e per service population. This is lower than the calculated efficiency target for 2033 (2.6 metric tons per year CO₂e per service population), further demonstrating the Project's consistency with AB 32's 2020 target and SB 32's 2030 target and establishing consistency with the *Climate Change Scoping Plan* and other applicable plans and policies adopted to reduce GHG emissions in accordance with AB 32 and SB 32. For these reasons, the Project's cumulative contribution to global climate change is less than significant.

c. Project Design Features

The following project design features are proposed with regard to GHG emissions:

Project Design Feature D-1: The design of the new buildings shall incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver or equivalent green building standards. Specific sustainability features that are integrated into the Project design to enable the Project to achieve LEED® Silver certification will include the following:

- a. Exceeding Title 24, Part 6, California Energy Code baseline standard requirements by 25 percent for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirements.
- b. Use of Energy Star-labeled products and appliances.
- c. Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.

Project Design Feature D-2: The Project shall limit the installation of natural gas fireplaces to 150 natural gas fireplaces, which would be included in the villa surrounding the outdoor amenity decks, penthouse units located at the top floor of the residential buildings, and outdoor amenities.

Project Design Feature D-3: Upon buildout of the Project, the Project shall install a minimum of 10 percent of the total domestic hot water heaters as solar or non-fossil fuel burning units.

Project Design Feature D-4: Upon buildout of the Project, at least 40 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 40 percent results in a fractional space, round up to the next whole number. A label stating “EV CAPABLE” shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Project Design Feature D-5: Upon buildout of the Project, at least 15 percent of the total code-required parking spaces shall be equipped with EV charging stations and/or outlets for plug-in. Plans shall indicate the proposed type and location(s) of charging stations. Plan design for charging stations shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 15-percent results in a fractional space, round up to the next whole number.

Project Design Feature D-6: Upon buildout of the Project, the Project shall provide a minimum of 500 kilowatts of photovoltaic panels on the Project Site, except where rooftop amenities preclude installation of photovoltaic panels.

In addition, as discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, a TDM Program would be developed and would include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips, pursuant to Project Design Feature K-7. Furthermore, Section IV.M, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft Supplemental EIR, includes various design features, implemented under Project Design Feature M.1-1, which would reduce water consumption.

d. Mitigation Measures

As discussed above, the Project would result in less-than-significant impacts related to GHG emissions. The Applicant would comply with applicable requirements as set forth

throughout this Draft Supplemental EIR and Project Design Features D-1 through D-7 to reduce GHG emissions. No project-level mitigation measures would be necessary. Nonetheless, the mitigation measures set forth in the Warner Center Plan EIR, and listed below, would be implemented as part of the Project. No additional mitigation measures are required. As provided below, Warner Center Plan Mitigation Measures AQ-17 through AQ-20 are measures for the City to implement and would not be applicable to the Project. Warner Center Plan Mitigation Measure AQ-22 has modified to be project specific. Although Warner Center Plan Mitigation Measure AQ-21 and AQ-22 is expected to reduce GHG emissions, such GHG emissions were conservatively not included in the above analysis. The Warner Center Plan Mitigation Measures are modified as indicated by ~~strikethrough~~ for deletions and underline for additions.

~~**Warner Center Plan Mitigation Measure AQ-17:** The City shall implement the WCRCCSP components, including transit and rideshare incentives and promotions, and the anticipated transit circulation system, transit shelters, bicycle lanes and pedestrian amenities that increase transit, bicycle and pedestrian modes of transportation to meet the assumptions used in the trip generation analysis.~~

[This mitigation measures is not applicable to the Project.]

~~**Warner Center Plan Mitigation Measure AQ-18:** The City shall encourage alternative work schedules and telecommuting in the WCRCCSP area.~~

[This mitigation measures is not applicable to the Project.]

~~**Warner Center Plan Mitigation Measure AQ-19:** The City shall require that the goods movement in to and out of the WCRCCSP areas be scheduled for off peak periods.~~

[This mitigation measures is not applicable to the Project.]

~~**Warner Center Plan Mitigation Measure AQ-20:** The City shall promote efficient parking management as parking demand decreases (as anticipated with smart growth), the City shall change parking requirements to reflect such changes and provide for re-use of parking lots and structures.~~

[This mitigation measures is not applicable to the Project.]

Warner Center Plan Mitigation Measure AQ-21: As streetlights are replaced, energy-efficient lighting shall be used.

Warner Center Plan Mitigation Measure 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.

e. Level of Significance After Mitigation

The Warner Center Plan EIR concluded that the Warner Center Plan's increase in emissions would have the potential to interfere with the State's ability to meet its goals under AB 32. Therefore, impacts from the Warner Center Plan were considered significant and unavoidable.

However, the Project represents a reduction of approximately one million square feet of development and approximately 76 percent of the weekday vehicular trips with a sold-out event, or 44 percent of weekday vehicular trips without an event, compared to the Warner Center Plan EIR's weekday results for the TAZ 9 within which the Project is located. The project-level GHG analysis provided above demonstrates that the Project's GHG emissions would not result in a significant impact after implementation of Project Design Features D-1 through D-6. Therefore, Project-level and cumulative impacts related to GHG emissions would be less than significant.

E. Hazards and Hazardous Materials

a. Analysis of Project Impacts

(1) Construction

(a) Hazardous Materials Use and Storage

During demolition, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site. The Project would be in compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, there is limited potential for Project construction activities to expose people to a substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts related to the use, storage, and management of hazardous materials during construction would be less than significant, and no Project-specific mitigation measures are required.

With respect to transport of hazardous materials, the Project would be required to adhere to the requirements of Warner Center Plan Mitigation Measure HAZ-3, which prohibits the transport of hazardous materials along Topanga Canyon Boulevard, along Burbank Boulevard, or within 0.25 mile of a school. Warner Center Plan EIR Mitigation Measure HAZ-5, requires any construction site storing hazardous materials to comply with applicable regulations regarding storage, transport and disposal of hazardous materials and wastes also would be implemented as part of the Project.

(b) Hazardous Waste Generation, Handling, and Disposal

Construction activities would occur in accordance with regulatory requirements, including specific California Occupational Safety and Health Administration (OSHA) requirements regarding worker safety and use of hazardous materials. Similarly, ground disturbance associated with site clearance, excavation, and grading activities during construction would be required to comply with relevant and applicable federal, state, and local regulations and requirements. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with hazardous waste management during construction would be less than significant, and no Project-specific mitigation measures are required.

Soil and groundwater sampling detected VOCs above screening levels in groundwater at one location along the southern perimeter of the Project Site. No VOCs were detected in the soil samples collected at the Project Site. While construction activities for the Project would include excavating down a maximum of 75 feet, construction activities would occur in accordance with applicable federal, state, and local regulations and requirements, including specific OSHA requirements regarding worker safety. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts related to the potential to encounter contamination in the subsurface during construction at the Project Site would be less than significant and no mitigation measures are required.

(c) Underground and Aboveground Storage Tanks

According to the Phase I Environmental Site Assessment, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. Therefore, construction of the Project would not include removal of any tanks and impacts would be less than significant.

(d) Asbestos-Containing Materials

Based on the age of the Shopping Center, asbestos-containing materials (ACMs) may be present on-site. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers in the environment. Therefore, impacts related to the removal of asbestos-containing materials during demolition would be less than significant and no mitigation measures are required.

(e) Lead-Based Paint

Based on the age of the Shopping Center, lead-based paint (LBP) may be present on-site. With compliance with relevant regulatory requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. Therefore, impacts related to the removal of LBP during demolition would be less than significant, and no mitigation measures are required.

(f) Polychlorinated Biphenyls

The presence of polychlorinated biphenyls (PCB)-electrical ballasts could not be confirmed. Several pieces of equipment that may have PCB-containing dielectric fluids, including transformers and dry-type air cooling units, were observed on-site. However, content labeling did not indicate any PCBs to be present on the transformers. Surficial staining was also not observed in the vicinity of the transformers or elevators. In the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations and guidelines. Therefore, impacts related to the removal of PCBs during demolition would be less than significant, and no mitigation measures are required.

(g) Emergency Response

According to the Safety Element of the City of Los Angeles General Plan, the Project Site is located along a designated disaster route along Topanga Canyon Boulevard and is 1.36 miles from the designated disaster route on Sherman Way.¹⁹ The Project could require temporary lane closures along Topanga Canyon Boulevard during construction of the Project. However, as discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, a Construction Management Plan would be implemented during construction of the Project that would include traffic controls to direct traffic, limitations on hauling routes, and restrictions on construction parking to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Furthermore, consistent with Warner Center Plan Mitigation Measure HAZ-4, access routes to and from the Project Site would be coordinated with the Los Angeles Fire Department (LAFD) and LADOT prior to construction. The Project would comply with all applicable codes and ordinances for emergency access. Therefore, impacts related to emergency response and evacuation during construction would be less than significant.

¹⁹ *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.*

(2) Operational Impacts

(a) Hazardous Materials Use and Storage

Operation of the Project would use potentially hazardous materials typical of those used in residential, retail/restaurant, office, hotel and entertainment uses. As with Project construction, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and continued compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the use, storage, and management of hazardous materials during operation of the Project would be less than significant. In addition, to ensure that such impacts would be less than significant, Warner Center Plan Mitigation Measure HAZ-5, which requires any permanent facility storing hazardous materials to comply with applicable regulations regarding storage, transport and disposal of hazardous materials and wastes, would be implemented.

(b) Hazardous Waste Generation, Handling, and Disposal

Operation of the Project would involve the use of potentially hazardous materials typically used in residential, retail/restaurant, office, hotel and entertainment uses, and for building and ground maintenance, including cleaning solvents, and pesticides for landscaping. As proposed operations would be similar to those operations occurring presently on-site, no substantial increases in the amount or type of operational hazardous wastes would be expected to occur.

No VOCs were detected in the soil samples. However, VOCs were detected above screening levels at one location in the southern perimeter. The groundwater data was evaluated using Project Site specific geotechnical information and standard modeling tools, and the estimated potential for such contaminants to migrate into indoor air at the Project Site are below risk-based thresholds for both commercial and potential future residential scenarios. Therefore, impacts would be less than significant, and no mitigation measures are required.

Activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Thus, impacts during operation of the Project would be less than significant. Nonetheless, Warner Center Plan Mitigation Measure HAZ-5 pertaining to the disposal of hazardous materials set forth below would be implemented to ensure that such impacts would be less than significant.

(c) Underground and Aboveground Storage Tanks

Expanded operations on the Project Site could require the installation and operation of new aboveground storage tanks to fuel the operation of new emergency generators. Their use would be subject to the applicable regulations related to the storage of hazardous substances in underground and aboveground storage tanks, as identified above in the Regulatory Framework. Thus, impacts associated with underground and aboveground storage tanks would be less than significant, and no mitigation measures are required.

(d) Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs. Thus, no impacts associated with asbestos or asbestos-containing materials during operation of the Project would occur and no mitigation measures are required.

(e) Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Impacts associated with LBP during operation of the Project would not occur, and no mitigation measures are required.

(f) Polychlorinated Biphenyls

In accordance with existing regulations which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, no impacts related to PCBs during Project operation would occur, and no mitigation measures are required.

(g) Emergency Response Plan

According to the Safety Element of the City of Los Angeles General Plan, the Project Site is located along a designated disaster route along Topanga Canyon Boulevard and is 1.36 miles from the disaster route on Sherman Way.²⁰ As part of the Project, emergency response provisions would be implemented as part of a Security Plan that would address both daily activities within the Project Site as well as special events. Refer to Section IV.J.1, Public Services—Police Protection, of this Draft Supplemental EIR, for further discussion of the proposed Security Plan for the Project. In addition, as discussed in

²⁰ *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.*

Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, traffic generated by the Project at buildout would not result in significant impacts with the full implementation of all Warner Center Plan improvements. In addition, the Project is adding an additional lane on Topanga Canyon Boulevard, adjacent to the Project Site, to further improve the flow of vehicles (including emergency vehicles) into the Project Site. Furthermore, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. In light of these factors, the increase in traffic generated by the Project would not significantly impact emergency vehicle response times to the Project Site and surrounding area. As such, impacts associated with emergency response and emergency evacuation plans would be less than significant, and no mitigation measures are required.

b. Cumulative Impacts

Each of the related projects would be required to comply with all applicable laws and regulations related to hazardous materials, including without limitation those associated with the use, storage, and/or disposal of hazardous materials and hazardous waste, storage tanks, asbestos-containing materials, LBP, PCBs, and emergency response. Additionally, like the Project, any related project within the Warner Center Plan area would be required to implement any applicable mitigation measures included in the Warner Center Plan EIR. Therefore, with full compliance with all applicable local, state, and federal laws, rules and regulations as well as implementation of site-specific recommendations for the related projects, cumulative impacts related to hazards and hazardous materials would be less than significant.

c. Project Design Features

No specific project design features beyond those set forth in Section II, Project Description, of this Draft Supplemental EIR are proposed with regard to hazards and hazardous materials.

d. Mitigation Measures

With compliance with relevant regulations, standards, and requirements, impacts with regard to hazards and hazardous materials were determined to be less than significant. Nonetheless, the mitigation measures set forth in the Warner Center Plan EIR, and listed below, would be implemented as part of the Project to ensure that such impacts would be less than significant. No additional mitigation measures are required. As previously noted, a Phase I Environmental Site Assessment was conducted for the Project; therefore, Warner Center Plan Mitigation Measure HAZ-1 is no longer required. The Phase I Environmental Site Assessment did not recommend the preparation of a Phase II

Environmental Site Assessment; therefore, Warner Center Plan Mitigation Measure HAZ-2, which requires the preparation of a Phase II Environmental Site Assessment if the Phase I Environmental Site Assessment recommends the preparation of those site assessments, does not apply to the Project. Warner Center Plan Mitigation Measures HAZ-1 and HAZ-2 have been modified as indicated by ~~strikethrough~~ for deletions and underline for additions.

~~**Warner Center Plan Mitigation Measure 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.~~

[A Phase I Environmental Site Assessment has been completed.]

~~**Warner Center Plan Mitigation Measure 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).~~

[This mitigation measures is not applicable to the Project.]

Warner Center Plan Mitigation Measure HAZ-3: The City shall require that each project applicant and/or contractor ensure that no hazardous materials are transported along Topanga Canyon Boulevard or Burbank Boulevard or within one-quarter mile of a school.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

e. Level of Significance After Mitigation

Implementation of the mitigation measures above would ensure that potential project and cumulative impacts associated with hazards would be less than significant, consistent with the Warner Center Plan EIR.

F. Hydrology, Surface Water Quality, and Groundwater

a. Analysis of Project Impacts

(1) Construction

(a) Surface Water Hydrology

Construction activities for the Project would include excavating down a maximum of 75 feet for basement levels, building structures, and hardscape and landscape around the structures. As the Project Site is greater than 1 acre, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of this permit, the Project would implement a Stormwater Pollution Prevention Plans (SWPPP) that specifies Best Management Practices (BMPs) and erosion control measures to be used during construction to manage runoff flows and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction. The NPDES and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Site to avoid runoff from impacting off-site drainage facilities or receiving waters. Construction activities are temporary, and flow directions and runoff volumes during construction would be controlled. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. As such, construction-related impacts to surface water hydrology would be less than significant.

(b) Surface Water Quality

Construction activities, such as earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. However, as previously discussed, projects disturbing greater than 1 acre of soil are required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of the permit, the Project would prepare and implement a site-specific SWPPP adhering to the California Stormwater Quality Association (CASQA) BMP Handbook. The SWPPP would specify BMPs to be used during construction. BMPs would include, but not be limited to, erosion

control, sediment control, non-stormwater management, and materials management. Typical BMPs that may be implemented during construction, including, but not limited to, sediment traps, gravel bag berms, and street sweeping and vacuuming, are listed in Exhibit 1 of the Water Resources Technical Report, provided in Appendix H, of this Draft Supplemental EIR.

With the implementation of site-specific BMPs included as part of the SWPPP, the Project would reduce or eliminate the discharge of potential pollutants from the stormwater runoff. In addition, the Project would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, temporary construction-related impacts on surface water quality would be less than significant.

(c) Groundwater Hydrology

No water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction. In addition, the Project would not include the construction of water supply wells. However, development of the Project would include excavations to a depth of up to 75 feet below ground surface (bgs). Groundwater was encountered at depths of 16 and 30 feet bgs, therefore, dewatering is expected during construction. Dewatering activities could temporarily affect local groundwater flow direction and depth. The maximum anticipated dewatering inflows during construction are not anticipated to draw water across any substantial distance and, therefore, would not adversely impact the rate or direction of flow of groundwater supply. In addition, due to the distance from the Project Site to the nearest water supply wells and the temporary nature of construction dewatering, the construction dewatering is not anticipated to change potable water levels sufficiently to reduce the ability of water utilities to use the groundwater basin for public water supplies or to reduce yields of adjacent well fields. Therefore, as Project development would not adversely impact the rate or direction of flow of groundwater and no water supply wells would be affected, the Project would not result in a significant impact on groundwater hydrology during construction.

(d) Groundwater Quality

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements, concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that

could affect the rate or change direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells on-site or within one mile of the Project Site, construction activities would not be anticipated to affect existing wells. Accordingly, Project impacts on groundwater quality would be less than significant, and no mitigation measures are required.

(2) Operation

(a) Surface Water Hydrology

The Project Site is approximately 92 percent impervious, including buildings and pavements for pedestrian and vehicular circulation. The remaining 8 percent of the Project Site is pervious, consisting of landscaped areas and lawns. With implementation of the Project, the amount of impervious area would decrease from approximately 92 percent to 90 percent. The boundaries of the drainage areas would be subdivided and slightly redirected compared to existing conditions. Development of the Project would result in a decrease in runoff to lines A and C, while there would be an approximately 23-percent increase in stormwater runoff to line B, the 36-inch line along Erwin Street. Under developed conditions, flows would increase to 48.63 cubic feet per second (cfs), which would leave an excess capacity of 19.09 cfs. Therefore the increased flow will have a less-than-significant impact to Line B. In addition, as part of the Standard Urban Stormwater Mitigation Plans (SUSMP) for the Project to manage post-construction stormwater runoff, the Project would include the installation of catch basins, planter drains, and building roof drain downspouts throughout the Project Site to collect roof and site runoff and direct stormwater away from structures through a series of underground storm drain pipes. This on-site stormwater conveyance system would serve to prevent on-site flooding and nuisance water on the Project Site. Furthermore, with implementation of the proposed Low Impact Development (LID) BMPs described below, the volume of water leaving the Project Site would be further reduced compared to existing conditions.

Based on the above, operation of the Project would result in a less-than-significant impact on surface water hydrology.

(b) Surface Water Quality

The Project would be required to implement SUSMP and LID requirements throughout the operational life of the Project. As part of these requirements, the Project would prepare a SUSMP, which would outline the stormwater treatment measures or post-construction BMPs required to control pollutants of concern. In addition, the Project would incorporate LID requirements as set forth by the LID Manual.

The Project Site currently does not have structural BMPs for the treatment of stormwater runoff from the existing impervious surfaces. Therefore, implementation of BMP systems proposed as part of the Project would result in a substantial improvement in surface water quality runoff from the site.

With implementation of BMPs, operational impacts on surface water quality would be less than significant.

(c) Groundwater Hydrology

Regarding groundwater recharge, the Project Site is 92 percent impervious in the existing condition and due to the nature of the soils, the remaining pervious areas behave in a manner similar to impervious surfaces. Therefore, there is minimal groundwater recharge potential on the Project Site in the existing condition. The Project will develop hardscape and structures that cover approximately 90 percent of the Project Site with impervious surfaces. Also, the pervious surfaces (such as landscaping) on the Project Site will drain into a controlled and managed drainage system that discharges into the storm drain system and not into the ground. Any changes to groundwater recharge would be negligible. Therefore, the Project's potential impact on groundwater recharge would be less than significant.

The subterranean levels of the Project are to be designed such that they are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. As such, permanent dewatering operations are not expected and the groundwater level is expected to return to the existing level at the Project site after construction is complete. Therefore the Project's potential impact during operation on groundwater level would be less than significant.

Based on the above, operation of the Project would result in a less-than-significant impact on groundwater hydrology, including groundwater levels.

(d) Groundwater Quality

Operational activities, which could affect groundwater quality include spills of hazardous materials such as cleaning supplies and pesticides and leaking aboveground or underground storage tanks. The Project may utilize aboveground and/or underground storage tanks, which contain diesel, associated with emergency generators. All tanks will be installed and maintained in compliance with all existing regulations. Thus, operation of aboveground and underground storage tanks on the Project Site will result in a less-than-significant impact on groundwater quality.

In addition, while the development of expanded facilities could increase the use of existing on-site hazardous materials, compliance with all applicable existing regulations at the Project Site would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated.

The Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. The Project does not include surface or subsurface application or introduction of potential contaminants or waste materials during construction or operation. The Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.

Based on the above, operation of the Project would result in a less-than-significant impact on groundwater quality.

b. Cumulative Impacts

(1) Surface Water Hydrology

The geographic context for the cumulative impact analysis on surface water hydrology is the Los Angeles River Watershed. The Project, in conjunction with the cumulative growth in the Los Angeles River Watershed (inclusive of the related projects), would cumulatively increase stormwater runoff flows potentially resulting in cumulative impacts to surface water hydrology. However, in accordance with City requirements, related projects and other future development projects would be required to implement BMPs, such that post-development peak stormwater runoff discharge rates would not exceed the estimated pre-development rates. Furthermore, the City of Los Angeles Department of Public Works would review each future development project on a case-by-case basis to ensure sufficient local and regional drainage capacity is available to accommodate stormwater runoff. Therefore, cumulative impacts on surface water hydrology would be less than significant.

(2) Surface Water Quality

The geographic context for the cumulative impact analysis on surface water quality is the Los Angeles River Watershed. As with the Project, cumulative growth in the Los Angeles River Watershed (including related projects) through 2035 would be subject to NPDES requirements regarding water quality for both construction and operation. In

addition, it is anticipated that the related projects and other future development projects would also be subject to SWPPP, SUSMP, and LID requirements and implementation of measures to comply with total maximum daily loads. Furthermore, increases in regional controls associated with other elements of the municipal separate storm sewer systems (MS4) permit would improve regional water quality over time. Additionally, with implementation of the Project, new BMPs for the treatment of stormwater runoff would be installed, thus improving the surface water quality runoff from the Project Site compared to existing conditions. Therefore, with compliance with all applicable laws, rules and regulations, cumulative impacts to surface water quality would be less than significant.

(3) Groundwater Hydrology

Cumulative groundwater hydrology impacts could result from the overall utilization of groundwater basins located in proximity to the Project Site and the related projects. While short-term, periodic dewatering has the potential to have a minimal effect on groundwater hydrology locally at the Project Site, dewatering operations at such a temporary, localized level would not have the potential to affect regional groundwater hydrology. The same would be true of related projects in the vicinity. Project development would not involve the permanent extraction of groundwater from the Project Site or otherwise utilize the groundwater. If any related project requires permanent dewatering systems, such systems would be regulated by the State Water Resources Control Board (SWRCB). Should excavation for other related projects extend beneath the groundwater level, temporary groundwater dewatering systems will be designed and implemented in accordance with SWRCB permit requirements. These dewatering operations would be limited to temporary and local impact to the groundwater level.

Furthermore, as previously discussed, implementation of the Project would result in negligible change in impervious surface area. Development of the related projects could result in changes in impervious surface area within their respective project sites. As the related projects are located in an urbanized area, any reduction in groundwater recharge due to the overall net change in impervious area within the related project sites would be minimal in the context of the regional groundwater basin.

Based on the above, cumulative impacts to groundwater hydrology would be less than significant.

(4) Groundwater Quality

As with the Project, the related projects would be unlikely to cause or increase groundwater contamination because compliance with existing statutes and regulations would prevent the related projects from affecting or expanding any potential areas affected

by contamination, or increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. Therefore, cumulative impacts to groundwater quality would be less than significant.

c. Project Design Features

No specific project design features beyond those set forth in Section II, Project Description, of this Draft Supplemental EIR are proposed with regard to hydrology, surface water quality, and groundwater.

d. Mitigation Measures

Impacts to surface water and groundwater hydrology and quality during construction and operation of the Project would be less than significant. No project-level mitigation measures would be necessary. Nonetheless, the mitigation measures set forth in the Warner Center Plan EIR, and listed below, would be implemented as part of the Project. No additional mitigation measures are required. As provided below, Warner Center Plan Mitigation Measure HYDRO-14 is not applicable to the Project as Arroyo Calabasas does not run through nor is it adjacent to the Project Site. The Project Site is approximately 0.45 mile southeast of Arroyo Calabasas. Warner Center Plan Mitigation Measure HYDRO-14 has been modified as indicated by ~~strike through~~ for deletions and underline for additions.

Warner Center Plan Mitigation Measure HYDRO-1: For development in the WCRCCSP 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 Practice (BMP) 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.)

Warner Center Plan Mitigation Measure HYDRO-2: For development in the WCRCCSP 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.

Warner Center Plan Mitigation Measure HYDRO-3: For development in the WCRCCSP 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.

Warner Center Plan Mitigation Measure HYDRO-4: For development in the WCRCCSP 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 ~~Strom~~ 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 (BMPs) and other items as required by the permit. (SUSMP measures require review and approval of the Watermaster.)

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure HYDRO-6: The City shall require as conditions on project approval within the WCRCCSP area that all wastes from construction in the WCRCCSP 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.

Warner Center Plan Mitigation Measure HYDRO-7: The City shall require as conditions on project approval within the WCRCCSP 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.

Warner Center Plan Mitigation Measure HYDRO-8: The City shall prohibit, as a condition on project approval within the WCRCCSP area, material spills from being hosed down at the pavement. Dry cleanup methods shall be required wherever possible.

Warner Center Plan Mitigation Measure HYDRO-9: The City shall require as conditions on project approval within the WCRCCSP 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.

Warner Center Plan Mitigation Measure HYDRO-10: The City shall require as conditions on project approval within the WCRCCSP 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.

Warner Center Plan Mitigation Measure HYDRO-11: The City shall require as conditions on project approval within the WCRCCSP 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.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure HYDRO-13: Ordinance No. 172176 and Ordinance No. 173494 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 www.swrcb.ca.gov/rwqcb4/).

- The project applicant shall implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing 0.75 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.

~~**Warner Center Plan Mitigation Measure HYDRO-14:** Daylighting of the Arroyo Galabajas (under the corner of the Topanga Plaza Shopping Center) along with flood control BMPs shall be encouraged by the Los~~

~~Angeles City Planning Department if and when this parcel is redeveloped.~~

[This mitigation measures is not applicable to the Project.]

e. Level of Significance After Mitigation

Surface water and groundwater hydrology and quality impacts would be less than significant without project-level mitigation. Additionally, implementation of Warner Center Plan Mitigation Measures HYDRO-1 through HYDRO-13 would further reduce impacts to hydrology and water quality.

G. Land Use

a. Analysis of Project Impacts

(1) Consistency with Local Plans and Applicable Policies

(a) Los Angeles General Plan

(i) Los Angeles General Plan Framework Element

The Project would support and would be generally consistent with the Land Use Chapter of the Framework Element as it would contribute to the needs of the City's existing and future residents, businesses, and visitors through the development of new residential, hotel, office, commercial/retail, and entertainment uses. The Project would also be located in an area well-served by public transportation options with convenient access to public transit and opportunities for walking and biking that would promote an improved quality of life by facilitating a reduction of vehicle trips and miles traveled and an associated reduction in air pollution. In addition, the Project would include land uses that support the Project Site's and surrounding area's designation as a Regional Center, which is identified as a high density area and a focal point of regional commerce, identity, and activity. Overall, the Project is consistent with the Framework Element's Land Use Chapter as it proposes a mixed-use development that would be consistent with the uses envisioned in this Regional Center, while retaining and enhancing the mixed-use character of the surrounding area. Thus, the Project would comply with the Framework Element's Land Use Chapter.

The Project would be consistent with the relevant objectives that support the goals of the Framework Element's Housing Chapter. The Project would support the City's objective to plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types through the development of 1,432 multi-family residential units, consisting of studio, one-, two-, and three-bedroom units. In addition, the Project would encourage the location of new multi-family housing to occur in

proximity to transit stations and along transit corridors, which include bus service provided by Metro, LADOT, Santa Clarita Transit, and the Antelope Valley Transit Authority, and Metro's new Warner Center circulator. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Housing Chapter.

The Project would also be consistent with the relevant objectives and policies that support the goals of the Framework Element's Open Space and Conservation Chapter. The Project would seek new opportunities for private development to enhance the open space resources of the community by providing approximately 5.6 acres of ground-level, publicly accessible open space that would include the approximately 60,000-square-foot Promenade Square and large courtyards referred to as the Gardens that would total approximately 22,000 square feet of landscaped space. The Project would also promote the development of public open space that is visible and safe by providing sufficient lighting along the walkways and courtyards, as well as a closed circuit camera system. Therefore, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Open Space and Conservation Chapter.

The Project would be consistent with the relevant objectives and policies that support the goals of the Framework Element's Economic Development Chapter. The Project would support the City's objective to establish a balance of land uses through the development of a mixed-use project with residential, hotel, office, commercial/retail, and entertainment uses within one integrated site and in an area well-served by public transit. In addition, the Project would concentrate office development in a regional mixed-use center, around transit stations, and within a community center. Thus, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Economic Development Chapter.

The Project would also be consistent with the relevant objectives and policies that support the goals of the Framework Element's Transportation Chapter and Mobility Plan 2035. Specifically, the Project would support the City's policy to design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user by designing proposed streets in accordance with City requirements and ensuring appropriate Americans with Disabilities Act amenities. The Project would also support the City's policy to provide for the safe passage of all modes of travel during construction by preparing and implementing a Construction Management Plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce the use of residential streets and congestion to public streets and highways. In addition, the Project would ensure high quality pedestrian access to provide a safe and comfortable walking environment by introducing active commercial uses along

street frontages and prominent pedestrian open space areas and walkways that would extend across the Project Site. Therefore, the Project would be generally consistent with the applicable policies that support the goals and objectives set forth in Mobility Plan 2035, which establishes the goals, objectives, and policies of the Framework Element's Transportation Chapter.

The Project would be consistent with the relevant objectives and policies that support the goals of the Framework Element's Infrastructure and Public Services Chapter. Specifically, the Project would support the City's policy and objective to reduce the amount of hazardous substances and the total amount of flow entering the stormwater system, as well as pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality by implementing a Stormwater Pollution Prevention Plan during construction that would include best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Infrastructure and Public Services Chapter.

Based on the analysis above, the Project would be consistent with the relevant goals, objectives, and policies of the Framework Element.

(ii) Los Angeles General Plan Conservation Element

The Conservation Element established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. As evaluated in Section IV.C, Cultural Resources, of this Draft Supplemental EIR, while the Macy's Building was not found to be an excellent or typical example of New Formalism, in deference to SurveyLA's findings, the analysis included in the Historic Resource Technical Report (Appendix E of this Draft Supplemental EIR) concurred with the findings that the Macy's Building appears to be eligible for listing in the California Register and as a Los Angeles Historic-Cultural Monument as an example of the New Formalism style with regional variations. Therefore, the Macy's Building is considered a historic resource for the purposes of this Draft Supplemental EIR. Consequently, the demolition of the Macy's Building would result in a significant impact to a historical resource and would not be consistent with the objective and policy for the conservation of cultural and historic resources set forth in the Conservation Element.

(iii) City of Los Angeles General Plan Housing Element

The Project would be consistent with the Housing Element of the General Plan. The Project would provide a variety of housing types in an area that is pedestrian-friendly and served by public transit; facilitate new construction of a variety of residential housing options; and expand opportunities for residential development, particularly in designated centers. Specifically, the Project would develop a total of 1,432 multi-family residential units consisting of studio, one-, two-, and three-bedroom units, which would meet a growing demand for housing in the City. The Project would also promote the construction of sustainable buildings by incorporating sustainable design features, including energy conservation, water conservation, a pedestrian- and bicycle-friendly site design and waste reduction measures. The proposed residential component, and the Project as a whole, would also promote livable neighborhoods with a mix of housing types, quality design, and a scale and character that respects the surrounding neighborhood. Therefore, the Project would be consistent with the applicable policies set forth in the Housing Element.

(iv) City of Los Angeles General Plan Health and Wellness Element—Plan for a Healthy Los Angeles

The Project would support the applicable goals and objectives of the Health and Wellness Element by implementing a mixed-use development and incorporating a variety of open space areas within the Project Site that promote walkability and biking to contribute to the creation of a healthy community. In particular, the Project would support the City's policy for a healthy building design and construction as well as a reduction in GHG emissions by redeveloping an underutilized site with large expanses of asphalt-paved surface parking with a new mixed-use development that provides a variety of supporting uses within one site and in close proximity to transit, including regional transit opportunities. This promotes a healthy built environment by creating buildings and sites that support conditions for healthy living and working, including promoting enhanced pedestrian-oriented circulation. The Project would further support the City's policy to include active spaces. Specifically, the Project would provide a variety of open space and recreational amenities to enhance the open space resources of the neighborhood, including approximately 5.6 acres of ground-level, publicly accessible open space that would include the approximately 60,000-square-foot Promenade Square and large courtyards referred to as the Gardens that would total approximately 22,000 square feet of landscaped space. The Project would also promote pedestrian activity and promote walkability in the vicinity of the Project Site by locating all of the proposed retail and restaurant uses on the ground floor of the proposed buildings, primarily along the street frontages. In addition, the Project would create multimodal transit options for Project users by providing bicycle parking consistent with the City's code requirements, which currently require 361 short-term and 1,726 long-term bicycle parking spaces. Therefore, the Project would be generally consistent with the applicable goals set forth in the Health and Wellness Element.

(v) Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan

The Project's general consistency with the goals, objectives, and policies set forth in the Southeast Los Angeles Community Plan is analyzed in detail in Table IV.G-3 of Section IV.G, Land Use, of this Draft Supplemental EIR. The Project would support the City's policy to locate higher density residential uses near commercial centers and major bus routes where public service facilities and utilities will accommodate the development by providing a mixed-use development consisting of residential, office, hotel, commercial/retail, and entertainment uses within a unified site and within a Regional Center in close proximity to transit. The Project would also support the goals, objectives, and policies established for commercial uses within the Community Plan area. Specifically, the Project encourages the preservation and strengthening of the commercial sector by developing an underutilized site with a diversity of retail, office, hotel, dining, and entertainment uses in a designated Regional Center. In addition, the Project would be designed to include streetscape improvements and publicly accessible open space areas internal to the site that would promote pedestrian activity within the local area and increase the accessibility to commercial development.

The Project would also promote the City's goals and objectives to provide adequate recreation and park facilities to meet the needs of the residents in the Community Plan area by including approximately 5.6 acres of ground-level, publicly accessible open space that would include the approximately 60,000-square-foot Promenade Square and large courtyards referred to as the Gardens that would total approximately 22,000 square feet of landscaped space, as well as approximately five acres of rooftop private open space within the proposed residential, office, and hotel buildings. Amenity roof decks are proposed for the residential buildings, which would include private pools, outdoor dining areas, landscaped park spaces, and shaded seating areas. Additionally, the Project would promote the City's goals, objectives, and policies to reduce vehicular trips by providing a mix of supporting uses within one site and in proximity to a variety of transit options, including the new Warner Center circulator which connects to Metro's Orange Line. The Project would also promote pedestrian activity through building design and streetscape amenities and bicycling parking areas. Further, the Project would implement a TDM Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. Overall, the Project would be consistent with the general intent of the Community Plan.

(b) Warner Center Plan

The purpose of the Warner Center Plan is to create a vital mixed-use, transit-oriented district for the Warner Center Plan area and surrounding communities. The Project would support the purpose of the Specific Plan by creating an integrated, mixed-use and transit- and pedestrian-oriented development that would contribute new visual elements to enhance the appearance of the surrounding cityscape.

The Project's proposed residential, retail, restaurant, hotel, office and entertainment uses would be consistent with those listed in Appendix A of the Warner Center Plan. The Entertainment and Sports Center is an Entertainment Use permitted and encouraged within the Downtown District of the Warner Center Plan. A Planning Director's Interpretation is requested as part of the Project's entitlements to approve the requested size of the Entertainment and Sports Center.

As discussed below, the Project would be in substantial conformance with the applicable requirements of the Warner Center Plan.

- Intensity—A base maximum FAR of 5.0:1 is permitted in the Downtown District, with an FAR of 6.0:1 permitted with a project's inclusion of specified incentives. The Project proposes an FAR of 2.3:1 at full buildout, which would be less than the maximum FAR permitted within the Downtown District of the Warner Center Plan.
- Permitted Development by Floor Area—Based on the Project's FAR of 2.3:1, the allowable ratio is 52 percent Non-Residential floor area and 48 percent Residential floor area. At buildout, the Project would provide 3,271,050 square feet of floor area, comprising 1,726,050 square feet of Non-Residential Floor Area (52 percent) and 1,545,000 square feet of Residential Floor Area (48 percent), consistent with the permitted ratios for projects within the range of 2.25 to 2.5 FAR.
- Ground Floor Limitations—Consistent with Section 6.1.2.3.4 of the Warner Center Plan, all ground floor areas within buildings would be limited to Non-Residential uses.

No standalone parking structures are proposed as part of the Project. The ground level of all parking structures would be wrapped with non-residential uses, activating these areas for pedestrians and screening parking from view. Non-Residential uses would therefore comprise more than 80 percent of the ground floor frontage for these buildings, consistent with the Warner Center Plan.

- Building Heights, Street Walls—The Project, which would contain buildings ranging from one-story (35 feet) up to 28 stories (502 feet) in height, would comply with the Downtown District's Street Wall requirements by ensuring a minimum building height of 35 feet for buildings with frontage along a public street or highway and with Street Wall design consistent with the Warner Center Plan's Urban Design Guidelines.
- Building Heights, Residential Building Heights—The Warner Center Plan, Section 6.1.2.3.5(c) provides that for Projects in the Downtown District containing residential uses, "the floor level of the highest residential dwelling unit must be at least 100 feet above the adjacent grade." Consistent with this requirement, for

each of the Project's residential buildings, the floor level of the highest residential dwelling unit would exceed 100 feet above the adjacent grade.

- **Activity Nodes and Active Streets**—The Project is located at two Activity Nodes,²¹ at the intersection of Erwin Street and Owensmouth Avenue as well as at the intersection of Oxnard Street and Owensmouth Avenue. Consistent with the requirements of Section 6.2.4.1, the Project would include pedestrian-serving uses within the Project's Activity Nodes.

The Project contains two Active Street Frontages²² along the northern boundary on Erwin Street and along the eastern frontage on Owensmouth Avenue. The Project is designed to activate pedestrian activity throughout the Project Site and along Owensmouth Avenue and Erwin Street leading to Metro's new Warner Center circulator. The Owensmouth Avenue and Erwin Street frontages would include retail and food opportunities, as well as the work portions of live/work units, consistent with Section 6.2.4.2.2 of the Warner Center Plan.

- **Setbacks**—The Project proposes perimeter setbacks of between 12 feet and 15 feet, consistent with the Warner Center Plan. In addition, a minimum of 30 percent of the Project's setback would be landscaped.

The Project's street frontages would also meet all the requirements of the Warner Center Plan, both with regard to the types of new trees planted and the pedestrian connections. New street trees consistent with the Warner Center Plan, and approved by the City of Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division, would be planted along all four streetscapes, and new parkways and sidewalks would be constructed. In addition, the Project would meet and exceed the Warner Center Plan's Publicly Accessible Open Space requirement.

Overall, with the requested approvals, the Project would be consistent with the Warner Center Plan.

(c) Warner Center 2035 Plan Sign District

In compliance with the Warner Center 2035 Plan Sign District, a uniform sign program is proposed which identifies sign types that can be viewed from the street, sidewalk, or public right-of-way. The uniform sign program provides a cohesive, integrated

²¹ As defined in the Warner Center Plan, an activity focal point located at the intersection of streets where pedestrian-serving uses are concentrated.

²² As defined in the Warner Center Plan, designated streets where buildings incorporate features and elements that are human scaled and can be used and enjoyed by pedestrians.

approach to the variety of signs required for building identification, wayfinding and regulatory needs. The signage at the Project would be integrated with the design of the Project's architecture and landscaping. Approval of the uniform sign program would support the use and urban design objectives of the Warner Center Plan by contributing to a vibrant, pedestrian atmosphere, reinforcing the pedestrian-oriented character of the Warner Center's streets, and ensuring uniform and high quality design that is integrated with the architectural design of the proposed buildings. Further, as discussed in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft Supplemental EIR, all Project signage would be designed to comply with the illumination and other signage requirements of the Warner Center Sign District. Therefore, the Project would be consistent with the Warner Center 2035 Plan Sign District.

(d) Los Angeles Municipal Code

The Project Site is zoned WC, indicating the Project Site is located in the Warner Center Plan area and is subject to the development standards related to height, setback, FAR, etc., as provided in the Warner Center Plan. Therefore, refer to the impact analysis of Project consistency with the Warner Center Plan previously provided.

In accordance with the LAMC, the Project also seeks approval of a Master Alcohol Conditional Use Permit to allow the on-site and off-site sale of alcoholic beverages. The service and sale of alcoholic beverages would be incidental to the principal residential, retail, restaurant, grocery store, hotel, and Entertainment and Sports Center operations.

Also pursuant to the LAMC, the Project seeks approval of three Vesting Tentative Tract Maps, including haul route and removal/relocation of protected trees and street trees and a Parcel Map Exemption to permit lot line adjustments of existing lot lines. As previously discussed, the proposed uses would be consistent with the existing land uses in the vicinity of the Project Site and the land uses permitted within the Downtown District of the Warner Center Plan.

In summary, with implementation of the requested discretionary actions, land use impacts related to LAMC consistency would be less than significant.

(2) Consistency with Regional Plans

Consistent with the 2016–2040 RTP/SCS, the Compass Growth Vision Report, and Southern California Association of Governments (SCAG)'s Regional Comprehensive Plan (RCP), the Project would maximize mobility and accessibility, support a sustainable and safe transportation system, and improve the environment by constructing an infill development within a designated High Quality Transit Area (HQTA). The Project would

develop a mix of residential, hotel, office, commercial/retail, and entertainment uses on the Project Site in an area that is well-served by existing public transportation provided by Metro and LADOT, including the new Warner Center circulator. The Project would also promote non-auto travel modes by providing bicycle parking spaces in accordance with City standards. Furthermore, the Project is designed and would be constructed to incorporate environmentally sustainable design features required by the Los Angeles Green Building Code, and the sustainability intent of the U.S. Green Building Council's LEED green building program to achieve LEED Silver certification or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features. Therefore, the Project would be generally consistent with the applicable goals and principles set forth in the 2016–2040 RTP/SCS, the Compass Growth Vision Report, and the RCP.

(3) Land Use Compatibility

Warner Center is a designated Regional Center and a developed community characterized by a mix of retail (including shopping center and commercial strip development), office, hotel, restaurant, entertainment, and residential uses within low- to high-rise settings. The Project would contribute to the existing diversity of uses in Warner Center by providing a new mixed-use development that includes uses consistent with the existing land uses surrounding the Project Site. The proposed uses would be integrated with a variety of open space and landscaping opportunities, creating an attractive downtown center while preserving the area's mixed-use character.

Relative to the Project's layout, design, and architecture, the heights of the proposed buildings would range from one to 28 stories (i.e., 35 feet up to 502 feet above grade). However, the proposed heights would not create a substantial contrast in the context of the varied low-rise, mid-rise, and high-rise developments that characterize the Warner Center area. Specifically, the proposed low- to mid-rise building heights proposed along Topanga Canyon Boulevard and Erwin Street would be consistent in scale with the predominantly low-rise and mid-rise buildings across Topanga Canyon Boulevard and Erwin Street. Similarly, the taller buildings proposed would be intentionally located on-site to be consistent with the other existing nearby high-rise structures.

As discussed in further detail in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft Supplemental EIR, Project development would represent an aesthetic improvement relative to the existing appearance of the Project Site and surrounding area and would generally improve the identity of the Project Site and Warner Center. Much of the supplied parking for the Project would be centrally located and integrated with the new uses, and thus would not be visible from the major thoroughfares bounding the Project Site. Landscaping and other streetscape improvements would be provided along the perimeter

of the Project Site creating publicly accessible landscaped open spaces internal to the Project Site. In addition, building façades along the perimeters of the Project Site would include a variety of design elements and articulation with building setbacks to further integrate the Project within the context of the existing development.

Based on the above, the Project would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term effect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation. Project impacts related to land use compatibility would be less than significant.

b. Cumulative Impacts

As shown in Figure III-1 in Section III, Environmental Setting, of this Draft Supplemental EIR, there are three related projects in proximity to the Project Site. The balance of the related projects would not cause cumulative land use impacts due to their similar characteristics (i.e., mixed-use residential and commercial projects) and because of their distance from the Project Site buffered by existing intervening development. Notwithstanding, the Project would be compatible with the various developments planned throughout the surrounding vicinity. Such related projects are not expected to fundamentally alter the existing land use relationships in the community, but rather would concentrate development on particular sites. Furthermore, as with the Project, the related projects would be required to comply with relevant land use policies and regulations. Additionally, as analyzed above, given that the Project's proposed mix of uses would be compatible with surrounding land uses, the Project would not result in an impact on land use compatibility. As such, the combined land use compatibility impacts associated with the Project's incremental effect and the effects of other related projects would be less than significant.

c. Project Design Features

No specific project design features beyond the Project improvements discussed in Section II, Project Description, of this Draft Supplemental EIR are proposed with regard to land use.

d. Mitigation Measures

Consistent with the Warner Center Plan EIR, Project-level and cumulative impacts with regard to land use and planning would be less than significant. Thus, no mitigation measures are required.

e. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to land use would be less than significant without mitigation.

H. Noise

a. Analysis of Project Impacts

(1) Construction Noise

(a) On-Site Construction Noise

As discussed in detail in Section IV.H, Noise, of this Draft Supplemental EIR, it is estimated that the noise level associated with construction activities at the Northeast–A area would exceed the significance threshold by 1.7 dBA at receptor location R1. The construction-related noise due to construction activities at the Northeast–B area would be below the significance threshold at all off-site receptor locations. Noise levels associated with construction activities at the Northwest–A and –B areas would exceed the significance thresholds at receptor locations R2 and R4 by 1.9 to 8.5 dBA. In addition, construction activities at the Southwest area would exceed the significance threshold at receptor locations R2, R3, and R4 by 5.6 to 13.6 dBA. Construction noise from the Southeast development area would be below the significance threshold at receptor locations R1, R3, and R4, but would exceed the significance threshold at receptor location R2 by up to 8.2 dBA.

There is potential for overlapping construction activities within the Northeast, Northwest and Southwest areas, which is analyzed as the Overlapping Construction Plan, described in detail in Appendix D, of this Draft Supplemental EIR. The potential impacts from the Overlapping Construction Plan were also analyzed under both the Overlapping Construction Plan With No Import and Overlapping Construction Plan With Import scenarios. As discussed in further detail in Section IV.H, Noise, of this Draft Supplemental EIR, Overlapping Construction Plan With No Import scenario would exceed the significance threshold at R1 through R4 by 0.4 dBA at off-site sensitive receptor location R1 up to 13.8 dBA at receptor location R2. The Overlapping Construction Plan With Import scenario would exceed the significance threshold by 1.8 dBA at receptor location R1 up to 12.1 dBA at R2.

Based on the analysis described above, noise impacts associated with the Project's on-site construction activities to the off-site receptor locations would be significant before mitigation measures. However, implementation of Warner Center Plan Mitigation

Measure NOI-5 would reduce the Project's on-site construction noise levels to a less-than-significant level.

While CEQA does not generally require the analysis of Project impacts to future on-site Project receptors, an analysis of potential construction-related impacts to future on-site residents is provided for informational purposes. Such an analysis is provided because future on-site residential uses (e.g., future occupants in the completed northern portion the Project Site) may be exposed to noise levels from construction activities within adjacent portions of the Project Site due to the distance between those uses to on-site construction activities. Should this occur, the estimated construction-related noise levels within the occupied residential areas would exceed the ambient noise level of approximately 63.4 dBA (based on the measured ambient at the Project Site's northern boundary, receptor Location P1), with noise levels that would be up to approximately 87 dBA during the intermittent peak construction periods when equipment is operating in close proximity to the residential uses. Thus, the 5 dBA significance threshold would be exceeded, and construction noise impacts at the on-site noise-sensitive uses would be significant. Implementation of Warner Center Plan Mitigation Measure NOI-5 would reduce construction-related noise at these uses by 15-dBA, however, the Project's construction noise impacts to on-site receptors would remain significant and unavoidable.

(b) Off-Site Construction Noise

In addition to on-site construction noise sources, other noise sources may include materials delivery, concrete delivery trucks, and haul trucks (construction trucks), as well as construction worker vehicles accessing the Project Site during construction. As discussed in detail in Section IV.H, Noise, of this Draft Supplemental EIR, Project-related construction traffic is estimated to be below the 5 dBA significance threshold at all off-site receptors. In addition, the estimated construction-related traffic at the Canoga Park High School would be below the Los Angeles Unified School District (LAUSD) 3 dBA significance threshold, if the construction haul trucks are required to travel north along Topanga Canyon Boulevard to the SR-118 due to the unavailability of the haul route south to the US-101.

To provide a conservative analysis, the noise impacts associated with the off-site construction-related traffic (construction trucks and worker vehicles) under the Overlapping Construction Plan were also evaluated assuming both the Overlapping Construction Plan With No Import and Overlapping Construction Plan With Import scenarios. The construction-related traffic with overlapping construction activities would be below the significance threshold at all off-site receptors and at Canoga Park High School.

Therefore, noise impacts associated with the Project's off-site construction traffic would be less than significant.

(2) Construction Vibration

(a) Building Damage Impacts from On-Site Construction

With regard to potential building damage, the Project would generate ground-borne construction vibration during building demolition and site excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, would be used. As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, the estimated vibration velocity levels from all construction equipment would be below the building damage significance threshold of 0.3 PPV for the two-story commercial building structures to the north and west, and 0.5 PPV for the multi-story office/hotel building structures to the south and east. The Guy Martin Oldsmobile and Livingston Pontiac building located at 6133 Topanga Canyon Boulevard was identified as a potential historic structure and would be exposed to maximum ground-borne vibration level of 0.005 PPV, which would be below the 0.3 PPV significance threshold applicable to the commercial building, and well below even the most stringent 0.12 PPV significance threshold. Therefore, vibration impacts associated with potential building damage would be less than significant.

(b) Human Annoyance Impacts from On-Site Construction

As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, the estimated ground-borne vibration levels from construction equipment would be below the significance thresholds for human annoyance at all off-site residential and hotel receptor locations. Therefore, vibration impacts during construction of the Project would be less than significant pursuant to the threshold of significance for human annoyance.

(c) Building Damage and Human Annoyance Impacts from Off-Site Construction

As discussed in detail in Section IV.H, Noise, of this Draft Supplemental EIR, there are existing buildings along the Project's anticipated haul route(s) that are situated approximately 25 feet from the truck path and would be exposed to ground-borne vibration levels of approximately 0.016 PPV, which would be below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, vibration impacts (pursuant to the threshold of significance for building damage) from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant.

Per FTA guidance, the threshold of significance for human annoyance is 72 VdB for sensitive uses, including residential uses. As discussed in detail in Section IV.H, Noise, of this Draft Supplemental EIR, the temporary vibration levels could reach approximately

72 VdB periodically as trucks pass by the residences along Topanga Canyon Boulevard. Therefore, potential vibration impacts with respect to human annoyance that could result from temporary and intermittent vibration from construction trucks traveling along the anticipated haul route(s) could be significant.

(3) Operational Noise

(a) *On-Site Stationary Noise Sources*

(i) *Mechanical Equipment*

As part of the Project, new mechanical and electrical equipment (e.g., air ventilation equipment and emergency generator) would be located at the exterior of the buildings (at grade or on the roof level) and within the interior of the buildings. Although operation of this equipment would generate noise, Project-related outdoor mechanical equipment would be designed so as not to increase the existing ambient noise levels by 5 dBA in accordance with the City's Noise Regulations. In addition, as provided in Project Design Feature H-2, all outdoor mounted mechanical equipment would be enclosed or screened from off-site noise-sensitive receptors. The estimated noise levels at all off-site receptor locations would be below the significance threshold of 5 dBA (L_{eq}) above ambient noise levels (based on the lowest measured ambient noise level). Therefore, noise impacts from mechanical equipment would be less than significant.

(ii) *Outdoor Spaces*

As discussed in Section II, Project Description, of this Draft Supplemental EIR, the Project would include various outdoor spaces, including: the Promenade Square at the center of the Project Site, two large open spaces located next to the residential buildings in the Northeast area (The Gardens), a smaller plaza area at the south side of the Northwest area, and roof decks at the residential, office, and hotel buildings. Noise sources associated with the outdoor spaces would include noise from people gathering and conversing. An additional potential noise source associated with outdoor uses would include the use of outdoor sound systems (e.g., music or other sounds broadcast through an outdoor mounted speaker system). As part of the Project and as set forth in Project Design Feature H-4, the amplified sound system used in outdoor areas would be designed so as not to exceed the maximum noise levels of 80 to 92 dBA L_{eq} .

As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, the estimated noise levels from the outdoor areas would range from 44.2 dBA (L_{eq}) at receptor location R1 to 55.0 dBA (L_{eq}) at receptor location R4. When added to the ambient, the Project would increase the ambient by 0.1 dBA at receptor location R1 to 4.5 dBA (L_{eq}) at receptor location R4. The estimated noise levels from the outdoor spaces would be below

the significance threshold of 5 dBA (L_{eq}) above ambient noise levels at all off-site sensitive receptors. As such, noise impacts from the use of the outdoor uses would be less than significant.

(iii) Entertainment and Sports Center

The Project includes a 15,000-seat Entertainment and Sports Center to be located within the Southwest area of the Project Site. As a live music/concert would generate the highest noise levels, as compared to the other anticipated events, the noise analysis is based on a concert event with an open-roof to represent the most conservative analysis. Noise associated with a typical concert event would also include a touring/temporary amplified sound system and crowd cheering noise. No pyrotechnics would be used during operation of the Entertainment and Sports Center. As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, the estimated noise levels from the Entertainment and Sports Center range from 53.3 dBA (L_{eq}) at receptor location R4 to 59.4 dBA (L_{eq}) at receptor location R2. The estimated noise levels from the Entertainment and Sports Center would be below the significance threshold at all off-site receptor locations. Therefore, noise impacts from the Entertainment and Sports Center would be less than significant.

(iv) Parking Facilities

The Project would include parking structures within each of the development areas. The above grade parking structures at Northeast–A, Northeast–B, and Northwest–B would be wrapped on all four sides. The above grade parking structures in the Southwest and Southeast areas would also each be wrapped on three sides by office, residential, retail or hotel uses; the only side of each structure which would not be wrapped would be facing the interior of the Project site (not the exterior public streets) and would include non-porous screening material from view. Noise associated with the Project's subterranean and above grade parking garages would be less than the noise currently generated by the existing unenclosed surface parking lots within the perimeter of the Project Site. As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, the estimated noise levels from the Project parking structures are estimated to range from 26.6 dBA (L_{eq}) at receptor location R3 to 41.0 dBA (L_{eq}) at receptor location R2. The estimated noise levels at all off-site receptor locations would be below the existing ambient noise levels and the significance threshold of 5 dBA (L_{eq}) above ambient noise levels. Therefore, noise impacts from parking operations would be less than significant.

(v) Loading Dock and Trash Collection Areas

Loading and trash collection would be located within the parking structures within the Northeast, Northwest, and Southeast development areas. The Southwest development

area would include an outdoor loading dock located at the east side of the Entertainment and Sports Center. Noise sources associated with the loading docks and trash collection areas would include delivery/trash collection trucks and operation of a trash compactor. As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, the estimated noise from loading dock and trash compactor operations is estimated to range from 22.5 dBA (L_{eq}) at receptor location R1 to 38.5 dBA (L_{eq}) at receptor location R2. The estimated noise levels at all off-site receptor locations would be below the existing ambient noise levels and the significance threshold of 5 dBA (L_{eq}) above ambient noise levels. Therefore, noise impacts from loading dock and trash compactor operations would be less than significant.

(b) Off-Site Mobile Noise Sources

(i) Future Plus Project

Future roadway noise levels were calculated along 39 selected roadway segments in the vicinity of the Project Site. As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, when there are sold-out events at the Entertainment and Sports Center, the estimated traffic noise increase would be below the 5 dBA significance threshold (hourly L_{eq}) at all analyzed roadway segments during the weekday and weekends, with one exception; on Saturdays during the post-event hour, the significance threshold would be exceeded by 0.1 dBA at one street segment, Oxnard Street between Topanga Canyon Boulevard and Owensmouth Avenue. Although, this roadway segment includes no off-site residential uses, off-site traffic noise impacts associated with future plus Project conditions would be significant at this location during sold-out events on weekend evenings.

As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, when there are no events at the Entertainment and Sports Center, the Project would result in less than significant off-site noise impacts at all locations.

(ii) Existing Plus Project

When compared with existing conditions, similar to the results above, the Project with sold-out events at the Entertainment and Sports Center would result in an estimated traffic noise increase below the 5 dBA significance threshold (hourly L_{eq}) at all analyzed roadway segments during the weekday and weekends, with one exception; on Saturdays during the post-event hour, the significance threshold would be exceeded by 0.3 dBA at one street segment, Oxnard Street between Topanga Canyon Boulevard and Owensmouth Avenue. Although this roadway segment includes no off-site residential uses, off-site traffic noise impacts based on the existing conditions would be significant during sold-out events on weekend evenings.

As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, when there are no events at the Entertainment and Sports Center, the Project would result in less than significant off-site noise impacts at all locations under existing conditions.

(c) Composite Noise Level Impacts from Project Operations

In addition to considering the potential noise impacts to neighboring noise-sensitive receptors from each specific on-site and off-site noise source (e.g., mechanical equipment, outdoor areas, music concerts, parking facilities, loading docks/trash compactors, and off-site traffic), an evaluation of potential composite noise level increases (i.e., noise levels from all on-site noise sources combined) at the analyzed sensitive receptor locations was also performed. As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, the Project would result in an increase in composite noise levels ranging from 1.1 dBA at receptor location R1 to 4.8 dBA at receptor location R2. The composite noise levels from Project operation at all off-site sensitive receptor locations would be below the 3 dBA significance threshold (applicable to receptor location R1, which falls within the normally unacceptable land use) and the 5 dBA significance threshold (applicable to receptor locations R2, R3, and R4, which fall within the conditionally acceptable land use). Therefore, composite noise level impacts due to Project operations would be less than significant.

(4) Operational Vibration

The primary source of vibration related to operation of the Project would include vehicle circulation within the proposed subterranean parking garage and off-site vehicular trips. However, as discussed above, vehicular-induced vibration is unlikely to be perceptible by people. The Project would also include typical commercial-grade stationary mechanical and electrical equipment, such as air-handling units and emergency generators (mounted at grade or roof level), that would include appropriate vibration-attenuation mounts to reduce the vibration transmission. The Project includes a 15,000-seat Entertainment and Sports Center. Crowd activities, including cheering, body motions and music would generate ground vibration within the Entertainment and Sports Center. However, the vibration levels generated by the music and crowds would be dissipated efficiently by the building construction elements, such as floors and foundations. Therefore, music and crowd-induced ground vibration would be limited to the interior of the Entertainment and Sports Center. In addition, ground-borne vibration attenuates rapidly as a function of distance from the vibration source. Therefore, operation of the Project would not increase the existing vibration levels in the immediate vicinity of the Project Site, and, as such, vibration impacts associated with operation of the Project would be less than significant.

(5) Land Use Compatibility

Based on the measured ambient noise levels, the exterior noise levels at the Project Site were 64.9 dBA CNEL at the northern boundary (measured at P1), 65.8 dBA CNEL at the eastern boundary (measured at P2), 67.7 dBA CNEL at the southern boundary (measured at P3), and 69.8 dBA CNEL at the western boundary (measured at P4). According to the City of Los Angeles Guidelines for Noise Compatible Land Use, the Project Site (northern, eastern and southern boundary) would be considered “conditionally acceptable” for residential, hotel, office, and sports arena development (between 60 and 70 dBA CNEL). In addition, the estimated traffic noise levels along the Project western boundary (along Topanga Canyon Boulevard), would be between 70 and 75 dBA CNEL, which would be considered “normally unacceptable” for the proposed hotel use. In addition, the future on-site noise sensitive uses (i.e., residential and hotel uses) would also be exposed to the Project on-site operational noise sources (i.e., outdoor mechanical equipment, outdoor spaces, and the Entertainment and Sports Center). However, in accordance with regulatory requirements, the Project would include necessary noise insulation features, such as insulated glass windows and doors, to achieve an interior noise environment that does not exceed 45 dBA CNEL for residential and hotel uses and 50 dBA L_{eq} for non-residential uses. Therefore, noise impacts associated with land use compatibility would be less than significant.

b. Cumulative Impacts

(1) Construction Noise

(a) On-Site Construction Noise

Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site, based on the *L.A. CEQA Thresholds Guide* screening criteria. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites.

Based on the analysis provided in Section IV.H, Noise, of this Draft Supplemental EIR, cumulative noise impacts at the nearby sensitive uses located in proximity to the Project Site and Related Project Nos. 15 and 27 could occur. Construction-related noise levels from the related projects would be intermittent and temporary. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Nonetheless, if nearby Related Project Nos. 15 and 27 were to be constructed concurrently with the Project, significant cumulative construction noise impacts could result.

(b) Off-Site Construction Noise

In addition to the cumulative impacts of on-site construction activities, off-site construction haul trucks would have a potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul route. It is conservatively assumed that truck traffic related to construction of the Project and the nearby related projects could cumulatively add up to 124 or more hourly truck trips, which would exceed the ambient noise levels by 3 dBA and exceed the significance threshold. Therefore, cumulative noise impacts from off-site construction are potentially significant.

(2) Construction Vibration

(a) On-Site Construction Vibration

As previously discussed, ground-borne vibration decreases rapidly with distance. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in proximity to the construction site, i.e., within 15 feet with regard to building damage. The nearest related projects to the Project Site are Related Project No. 27, which is approximately 100 feet north of the Project Site and Related Project No. 15, which is approximately 700 feet from the Project Site. Due to the rapid attenuation characteristics of ground-borne vibration and given the distance of the nearest related project to the Project Site, there is no potential for a cumulative construction vibration impacts with respect to building damage associated with ground-borne vibration from on-site sources.

The closest distance at which construction vibration could result in significant impact as related to human annoyance is 80 feet. The nearest sensitive use to the Project and Related Project No. 15 is the multi-family residential use west of Glade Avenue, which is approximately 640 feet from the Project and 680 feet from the Related Project No. 15 construction areas. In addition, Related Project No. 27 is located approximately 660 feet from the nearest sensitive receptor, the multi-family residential use at the southwest corner of Erwin Street and Glade Avenue. Therefore, cumulative construction vibration impacts pursuant to the threshold for human annoyance would be less than significant in the event concurrent construction of the Project and Related Project No. 15 or Related Project No. 27 were to occur.

(b) Off-Site Construction Vibration

As previously discussed, based on FTA data, the vibration generated by a typical heavy truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul route(s) would be

below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration and cumulative vibration impacts with respect to building damage from off-site construction would be less than significant.

As discussed above, potential vibration impacts associated with temporary and intermittent vibration from Project-related construction trucks traveling along the anticipated haul route would be potentially significant with respect to human annoyance. As the related projects would be anticipated to use similar trucks as the Project, it is anticipated that construction trucks would generate similar vibration levels along the anticipated haul route (i.e. Topanga Canyon Boulevard). Therefore, to the extent that other related projects use the same haul route as the Project, potential cumulative human annoyance impacts associated with temporary and intermittent vibration from haul trucks traveling along the designated haul routes would be significant.

(3) Operational Noise

(a) On-Site Stationary Noise Sources

Due to provisions set forth in the LAMC that limit stationary source noise from items such as roof-top mechanical equipment, noise levels would be less than significant at the property line for each related project. In addition, other general noise sources, such as public gatherings in large outdoor spaces would be limited to the vicinity of each of the project sites and comply with LAMC Section 116.01. Due to distance and intervening building structures, noise associated with the outdoor spaces would not have a significant contribution to the cumulative noise impact. Therefore, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

(b) Off-Site Mobile Noise Sources

The Project and related projects in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, cumulative traffic volumes under future plus project conditions, assuming a sold-out event, would result in noise increases that are less than the significance threshold at all street segments except at Oxnard Street between Topanga Canyon Boulevard and Owensmouth Avenue. At that location, cumulative off-site noise would exceed the significance threshold by up to 0.3 dBA during the weekday and by up to 0.6 dBA during the weekend, both during the post-event hour. Therefore, cumulative off-site traffic noise impacts under future plus project conditions would be potentially significant. This street segment does not contain off-site residential uses.

As discussed further in Section IV.H, Noise, of this Draft Supplemental EIR, when there are no events at the Entertainment and Sports Center, the estimated noise increase due to cumulative traffic would be below the 3 dBA CNEL significance threshold. The estimated cumulative traffic noise increase during the nighttime hour would be below the 5-dBA significance threshold (hourly L_{eq}) at all analyzed roadway segments when there are no events at the Entertainment and Sports Center.

c. Project Design Features

The following Project Design Features are proposed with regard to noise and vibration:

Project Design Feature H-1: Project construction would not include the use of driven (impact) pile systems.

Project Design Feature H-2: All outdoor mounted mechanical equipment would be enclosed or screened from off-site noise-sensitive receptors. The equipment screen would be impermeable and break the line-of-sight from the equipment to the off-site noise-sensitive receptors.

Project Design Feature H-3: Trash collection areas would be enclosed or screened from off-site noise-sensitive receptors.

Project Design Feature H-4: Within outdoor areas, other than the Entertainment and Sports Center, outdoor amplified sound systems (e.g., speaker and stereo systems, amplification systems, or other sound-producing devices) would be designed so as not to exceed the maximum noise level of: (i) 80 dBA (L_{eq-1hr}) at a distance of 25 feet from the amplified sound systems at the courtyards/roof decks; (ii) 90 dBA (L_{eq-1hr}) at a distance of 25 feet at the hotel roof pool decks; and (iii) 92 dBA (L_{eq-1hr}) at a distance of 50 feet for the amplified sound systems at the Promenade Square.

Project Design Feature H-5: If the roof of the Entertainment and Sports Center is open, the temporary/touring amplified sound system would be designed, using a line-array speaker system, so as not to exceed a maximum noise level of 95 dBA (L_{eq-1hr}) at a distance of 130 feet from the amplified sound systems (main array and delay speakers).

d. Mitigation Measures

As analyzed above, construction of the Project would have the potential to result in significant impacts at the off-site noise sensitive receptors. Therefore, the following measures, which also include mitigation measures specified in the Warner Center Plan EIR, are provided to minimize the construction-related impacts. Warner Center Plan Mitigation Measures NOI-1, NOI-2, and NOI-8 are not applicable to the Project as the

Project is not 500 feet of an LAUSD school. In addition, Warner Center Plan Mitigation Measure NOI-9 would not be applicable to the Project as there are no buildings that are more than 70 years old within 100 feet of the Project Site. Modifications to the mitigation measures set forth in the Warner Center Plan EIR are indicated by ~~strikethrough~~ for deletions and underline for additions.

~~**Warner Center Plan Mitigation Measure NOI-1:** For projects within 500 feet of an LAUSD school, the City shall require preparation of a Construction Noise Management Plan (CNMP) to evaluate potential noise impacts on the potentially affected school. The CNMP shall be prepared by a licensed Acoustical Engineer and shall include measurement of existing noise conditions and noise modeling of anticipated construction activities at the site. The CNMP will be used by the Department of City Planning to determine the appropriate mitigation measures for any potentially significant noise impacts generated by a project.~~

[This mitigation measure is not applicable to the Project.]

~~**Warner Center Plan Mitigation Measure NOI-2:** For projects within 500 feet of an LAUSD school, the City shall require preparation of a Facility Noise Management Plan (FNP) to ensure that noise emissions from facility operations, including stationary mechanical equipment, do not cause significant impacts on nearby schools. The Facility Noise Management Plan shall ensure that the cumulative mechanical equipment noise does not exceed a level of 64 dBA at the closest school's lot line. The FNMP shall be prepared by a licensed Acoustical Engineer and shall include noise measurements of existing conditions and noise modeling of anticipated on-site noise sources including any loading docks, public address system, any anticipated crowd/spectator noise and other sources of both stationary and mobile noise. Compliance with this noise limitation may include, but is not limited to, the installation of noise walls/barriers, mechanical equipment enclosures, roof mounted parapets, silencers, barriers and/or appropriate setbacks.~~

[This mitigation measures is not applicable to the Project.]

Warner Center Plan Mitigation Measure NOI-3: The City shall require that all construction activities within the WCRCCSP area shall 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 ~~take~~ be allowed on Sundays or national holidays.

Warner Center Plan Mitigation Measure NOI-4: The City shall require that noise-generating construction equipment be equipped with the most effective commercially available 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.

Warner Center Plan Mitigation Measure 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. Specific locations for the temporary sound barriers shall include the following:

- During construction of the Northeast Area, at the northeastern corner of the Project Site to block the line-of-sight between the construction area and receptor location R1. This temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at receptor location R1.
- During construction of the Southwest Area, at the southwestern corner and southern border of the Project Site to block the line-of-sight between the construction area and receptor locations R2, R3, and R4. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at receptor location R2, 7-dBA noise reduction at receptor location R3, and 12 dBA noise reduction at receptor location R4.
- During construction of the Northwest Area, at the western and southern boundary of the Northwest area to block the line-of-sight between the construction area and receptor locations R2 and R4. The temporary sound barrier shall be designed to provide a minimum 7-dBA and 12-dBA noise reduction at receptor locations R2 and R4, respectively.
- During construction of the Southeast Area, at the southern boundary of the Project Site to block the line-of-sight between the construction area and receptor location R2. This temporary sound barrier shall be designed to provide a minimum 9-dBA noise reduction at receptor location R2.
- During any phase of construction where on-site construction activities would be located adjacent to on-site sensitive receptors. This temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level.

Warner Center Plan Mitigation Measure NOI-6: The City shall require that construction 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.

Warner Center Plan Mitigation Measure NO-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.

~~**Warner Center Plan Mitigation Measure NOI-8:** For projects within 500 feet of an LAUSD school, the City shall ensure that if the results of the Construction and/or Facility Noise Management Plans submitted to the Department of City Planning as part of the Project Permit Compliance Review application show that additional noise mitigation measures are necessary, these additional measures shall be imposed by the Planning Department.~~

[This mitigation measures is not applicable to the Project.]

~~**Warner Center Plan Mitigation Measure NOI-9:** As part of the entitlement process of new projects established by the WCRCCSP implementing ordinances, the City shall ensure that any construction within 100 feet of an adjacent off site building of more than 70 years old such buildings should be protected from potential vibration impacts as appropriate~~

[This mitigation measures is not applicable to the Project. There are no buildings that are more than 70 years old within 100 feet of the Project Site.]

e. Level of Significance After Mitigation

(1) Construction Noise

(a) On-Site Construction Noise

Project-level noise impacts from on-site construction to off-site receptors would be reduced to a less-than-significant level with implementation of the mitigation measures provided above. Specifically, installation of temporary sound barriers (Warner Center Plan Mitigation Measure NOI-5) would reduce the noise generated by on-site construction activities at receptor R1 by 5 dBA, at receptor R2 by 15 dBA, at receptor R3 by 7 dBA and at receptor R4 by 12 dBA. However, impacts to on-site receptors would remain significant and unavoidable. In addition, cumulative construction noise impacts associated with on-site noise sources would remain significant and unavoidable if nearby Related Project Nos. 15 or 27 were to be constructed concurrently with the Project.

(b) Off-Site Construction Noise

Project-level noise impacts from off-site construction would be less than significant. However, cumulative noise due to construction truck traffic from the Project and other related projects is conservatively assumed to exceed the ambient noise levels along the haul route by 3 dBA (applicable to LAUSD's school along the haul route). As such, cumulative noise impacts from off-site construction would be significant and unavoidable.

(2) Construction Vibration

(a) On-Site Construction Vibration

Vibration levels generated from on-site construction activities at the adjacent off-site buildings would be below the significance threshold for building damage. Therefore, project and cumulative vibration impacts with respect to building damage would be less than significant.

Vibration levels from on-site construction activities at the off-site sensitive receptors would be below the significance threshold for human annoyance. Therefore, project and cumulative vibration impacts from on-site construction with respect to human annoyance would be less than significant.

(b) Off-Site Construction Vibration

Vibration levels generated by construction trucks (i.e., haul, delivery, and concrete trucks) along the Project's haul routes would be well below the significance threshold for building damage. Therefore, project and cumulative vibration impacts with respect to building damage would be less than significant.

Vibration levels from construction trucks would exceed the significance threshold for human annoyance at vibration sensitive receptors along the anticipated haul route (i.e., Topanga Canyon Boulevard). Therefore, Project-level and cumulative vibration impacts from off-site construction with respect to human annoyance would be significant.

(3) Operational Noise

Project-level and cumulative impacts with regard to on-site sources of operational noise would be less than significant. However, as indicated above, Project traffic noise impacts associated with departing special events traffic for sold-out events on weekend evenings would be significant, and cumulative traffic noise impacts would be significant for sold-out events during the weekday and weekend post-event hours.

I. Population, Housing, and Employment

a. Analysis of Project Impacts

(1) Construction

(a) Population and Housing

Construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. In addition, the Project would not demolish any housing units. Thus, there would not be any significant population and housing impacts on household growth in the SCAG Region or the City of Los Angeles due to Project construction. Therefore, construction-related impacts associated with population and housing would be less than significant.

(b) Employment

Project development would generate construction workers on-site, however, individual construction projects generally do not generate new employment within the region. Rather, there is a pool of construction workers who move from project to project as work is available. The Project would, therefore, support the regional pool of construction workers and also contribute additional indirect jobs in a wide range of industries throughout the region resulting from purchases of construction-related supplies, goods and services, and household expenditures by direct and indirect employees. Overall, since construction employment related to the Project would be temporary and would not exceed expected growth, construction-related employment impacts would be less than significant.

(2) Operation

(a) Direct Population Impacts

The Project includes 1,432 multi-family residential units and, thus, would introduce a new residential population into the area. Based on a household size factor of 2.73 persons per household for multi-family housing units and a 95 percent occupancy rate, the Project is estimated to generate a residential population of 3,714 persons at full buildout.²³ Based on SCAG's 2016–2040 RTP/SCS, the population of 3,714 persons generated by the Project would represent approximately 0.16 percent of the projected growth in the SCAG

²³ The population estimate is based on stabilized Project occupancy of 95% and 2.73 persons per household in rental units, per the 2010–2014 American Community Survey 5-year estimates for the City of Los Angeles.

region between 2016 and 2033 (i.e., the Project's baseline and buildout years), and 0.8 percent of the projected growth in the City of Los Angeles during the same period. As such, the 3,714 new residents constitute a small percentage of City and regional growth and would be consistent with contemplated growth under the Warner Center Plan as described in the Warner Center Plan EIR. Therefore, Project impacts related to population growth would be less than significant, and no mitigation measures are required.

(b) Direct Housing Impacts

As stated in many adopted regional and local planning documents, including the City's 2013–2021 Housing Element, the City remains in need of new dwelling units to serve both current and projected populations and the Project would incrementally advance the goal of generating more housing for the region. The 1,432 multi-family residential units included in the Project would represent approximately 0.16 percent of the projected housing growth in the SCAG region between 2016 and 2033, and 0.65 percent of the projected housing growth in the City of Los Angeles during the same period. Project-related household growth would be consistent with contemplated growth under the Warner Center Plan as described in the Warner Center Plan EIR. Based on the above analysis, the Project would not cause housing growth to exceed projected/planned levels for the Project's buildout year and impacts relating to housing growth would be less than significant, and no mitigation measures are required.

(c) Direct Employment Impacts

Development of the Project would result in approximately 4,530 employment positions on the Project Site. When accounting for the removal of existing uses, a net increase of approximately 3,048 on-site jobs during operation would be anticipated to occur. The additional 3,048 on-site employees that would be generated by the Project would represent approximately 0.21 percent of employment growth forecasted for the SCAG Region between 2016 and 2033 and approximately 1.06 percent of the employment growth forecasted for the City of Los Angeles between 2016 and 2033 based on SCAG's 2016–2040 RTP/SCS. Furthermore, Project-related employment growth would be consistent with contemplated growth for the Warner Center Plan as described in the Warner Center Plan EIR. Therefore, Project-related employment generation would be within and, thus, consistent with SCAG's employment forecasts for the SCAG Region and the City of Los Angeles.

Therefore, impacts related to employment consistency with SCAG's forecast for the SCAG region and the City of Los Angeles would be less than significant, and no mitigation measures are required.

(d) Indirect Population and Housing Impacts

The Project would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG region. Additionally, the Project is consistent with all applicable City and regional population policies, including jobs/housing balance, as set forth in the City's General Plan and SCAG's 2016–2040 RTP/SCS and Compass Growth Vision. Therefore, the Project would not result in any significant adverse impacts in terms of compatibility with adopted local and regional population growth policies, as set forth in the City's General Plan and SCAG's 2016–2040 RTP/SCS and Compass Growth Vision.

With regard to infrastructure, the Warner Center Plan EIR discusses the use of existing infrastructure for proposed developments within the Warner Center Plan. Thus, the population, employment and housing generated by the Project is accounted for in the Warner Center Plan and would not require any significant regional public infrastructure upgrades. New development would be required to include provisions to make necessary local improvements (such as connections to main sewer and water lines and upgraded substations and pumping facilities). In addition, individual project developers would be required to fund their fair share of necessary local infrastructure associated with the proposed development under the Warner Center Plan. Therefore, the Project would not result in any significant adverse impacts in terms of the introduction of unplanned infrastructure that was not previously evaluated in the Community Plan and the General Plan.

With regard to housing, any indirect demand for housing would be fulfilled by a combination of the Project's 1,432 dwelling units, vacancies in the surrounding housing market, and from other new units in the vicinity of the Project. As such, the Project's indirect housing demand would not cause housing growth to exceed projected/planned levels for the Project's buildout year, and the Project's indirect impacts on housing would be less than significant.

(3) Consistency with Adopted Plans and Policies

As detailed in Section IV.I, Population, Housing, and Employment, of this Draft Supplemental EIR, the Project would be consistent with applicable plans and policies in the Framework Element, the Los Angeles General Plan Housing Element, the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan, the SCAG housing policies, SCAG's Compass Growth Vision, and the Warner Center Plan EIR that relate to population, housing, and employment. Overall, the Project would be consistent with applicable plans and policies that relate to population, housing, and employment.

(4) Other Growth-Inducement Issues

While the Project is consistent with various regional and local housing policies and employment forecasts, it would not, in and of itself, foster new growth in the area by removing impediments to growth. As discussed in Section IV.G, Land Use, of this Draft Supplemental EIR, the Project Site is currently developed with retail uses within the Westfield Promenade Shopping Center. All roadway improvements planned for the Project would be tailored to enhance pedestrian safety or improve circulation flows throughout the area, consistent with the Project's impacts and objectives. The Project would not require any utility or other infrastructure upgrades. The Project employees' demand for convenient commercial goods and services would be met by new retail, service, and other resources included as part of the Project or already located within close proximity to the Project Site. No additional development specifically to meet the Project's scale of household demand would be needed.

b. Cumulative Impacts

The Warner Center Plan projects that by 2035, there will be a population of 58,608, 26,048 housing units, and 89,118 jobs within the Warner Center Plan area. The Project would add approximately 3,714 people, up to 1,432 units of housing, and approximately 3,048 jobs within the proposed land uses. Eight of the 29 related projects are located within the Warner Center Plan area. In total, these eight projects would generate approximately 7,151 people, up to 2,757 housing units, and approximately 7,785 jobs in addition to the Project's expected growth discussed above. As such, the Project and related projects cumulative impacts on population, housing, and employment would be well within the contemplated population and dwelling unit growth proposed in the Warner Center Plan. Furthermore, per the Warner Center Plan, if a project is proposed prior to January 1, 2036, that would exceed the aforementioned proposed dwelling units, the Director of City Planning may initiate a review of the project, including any necessary environmental analysis. The detailed review may include a restudy of the portion of the Warner Center Plan that exceeds the proposed dwelling units and floor area.

As detailed in Section IV.I, Population, Housing, and Employment, of this Draft Supplemental EIR, the cumulative population growth, household growth, and employment growth would not represent a considerable percentage of the estimated population, housing, and employment growth in the City of Los Angeles and, as such, cumulative population, housing, and employment growth impacts would be less than significant.

c. Project Design Features

No specific project design features are proposed for the Project with regard to population, housing, or employment.

d. Mitigation Measures

Consistent with the Warner Center Plan EIR, Project-level and cumulative impacts with regard to population, housing, and employment would be less than significant. Therefore, no mitigation measures are required.

e. Level of Significance After Mitigation

Consistent with the Warner Center Plan EIR, Project-level and cumulative impacts related to population, housing, and employment would be less than significant.

J.1. Public Services—Police Protection

a. Analysis of Project Impacts

(1) Construction

Project construction would not generate a permanent population on the Project Site that could increase the police service population of the Topanga Area and Topanga Community Police Station. In addition, the demand for police protection services during construction of the Project would be offset by the removal of the existing uses, which currently generate a daytime population that requires police protection services. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. The Project would implement Warner Center Plan Mitigation Measures PS-12 through PS-14. With implementation of these measures, potential impacts associated with theft and vandalism during construction of the Project would be less than significant.

Project construction activities could also potentially impact the provision of the Los Angeles Police Department (LAPD) police protection services and response times within the Topanga Area due to construction impacts on the surrounding roadways. However, as discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Management Plan would be implemented during Project construction pursuant to Mitigation Measure K-1 in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, to ensure that adequate

and safe access is available within and near the Project Site during construction activities. Furthermore, emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

With the implementation of Warner Center Plan Mitigation Measures PS-12 through PS-14, temporary construction activities associated with the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site, nor would Project construction cause a substantial increase in emergency response times as a result of increased traffic congestion. Thus, impacts on police protection services during Project construction would be less than significant.

(2) Operation

The Project Site is served by the Topanga Community Police Station. With the Project's estimated net police service population of 21,794 persons, which would increase the existing police service population of the Topanga Area from 196,840 persons to 218,634 persons. With the increase in the police service population of the Topanga Area and Topanga Community Police Station, the officer-to-resident ratio for the Topanga Area would decrease from approximately 1.2 officers per 1,000 residents to approximately 1.1 officers per 1,000 residents. Therefore, the Project would not cause a significant change to the officer-per-resident ratio for the Topanga Area.

Approximately 110 crimes were reported in the Topanga Area for 2017, which equates to a crime rate of approximately 0.6 crime per 1,000 residents or 0.0006 crime per capita. Based on the assumption that the annual crime rate would remain constant at 0.0006 crime per capita, the Project could potentially generate approximately 13 new crimes per year.²⁴ This would increase the annual number of crimes reported in the Topanga Area from 110 to 123 reported crimes per year, an increase of 12 percent.²⁵ It should be noted that the Project's estimated service population likely overestimates the increase in crime, and is therefore conservative, as it assumes daily sold-out events of 15,000 seats in the Entertainment and Sports Center.

To address crowd management and control for the Entertainment and Sports Center, the Project would implement Project Design Features J.1-1 through IV.J.1-9, which

²⁴ *Total crimes generated by the Project = estimated crime rate of 0.0006 crime per capita x Project service population of 21,794 persons = 13 crimes.*

²⁵ *The percent increase in crimes per year = number of proposed reported crimes 13 ÷ current annual reported crimes 110 x 100 = 12 percent.*

would provide for private, on-site security for the Entertainment and Sports Center, and security for the overall Project Site, and include the development of an Emergency Response Plan. The Project would also implement Warner Center Plan Mitigation Measures PS-16 through PS-19, which would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. With implementation of Project Design Features J.1-1 through J.1-9 and Mitigation Measures PS-16 through PS-19, the Project's impact on police protection services would be less than significant.

The Project would introduce new uses to the Project Site, which would generate additional traffic in the Project vicinity. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, upon buildout of the Project (Future With Project Conditions) and with implementation of the Warner Center Plan's transportation mitigation program assumed in the Warner Center Plan EIR, traffic generated by the Project would not result in significant impacts. In addition, the drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Furthermore, as further discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, the Project is adding an additional lane on Topanga Canyon Boulevard, adjacent to the Project Site, to further improve the flow of vehicles (including emergency vehicles) into the Project Site. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial increase in emergency response times due to traffic congestion. Therefore, the Project's impact on emergency response times would be less than significant.

Based on the above, impacts on police protection services during Project operation would be less than significant.

Furthermore, as described in Subsection 3.b., consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

b. Cumulative Impacts

As identified in Section III, Environmental Setting, of this Draft Supplemental EIR, a total of 29 related projects are located in the vicinity of the Project Site. All of the 29 related projects fall within the service boundaries of the Topanga Area and are served by the Topanga Community Police Station. A map of the related project locations is provided in Figure III-1 in Section III, Environmental Setting, of this Draft Supplemental EIR.

(1) Construction

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each related project's development review process conducted by the City. Similar to the Project, each related project would also be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In addition, construction-related traffic generated by the Project and the related projects would not significantly impact LAPD response times within the Project Site vicinity as drivers of police vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Project together with related projects would result in a less than significant cumulative impact, and the Project's contribution to cumulative impacts on either police protection services or emergency response during construction would not be cumulatively considerable.

(2) Operation

Based on the police service population factors provided in the *L.A. CEQA Thresholds Guide*, the related projects would generate a police service population increase of approximately 53,542 persons within the Topanga Area. The Project would contribute to this cumulative increase in the police service population of the Topanga Area by generating a net police service population of approximately 21,794 persons. When combined with the projected police service population of 53,542 persons generated by the related projects, the total cumulative police service population is approximately 75,336 persons. The police service population generated by the Project and related projects would increase the total police service population of the Topanga Area from 196,840 persons to 272,176 persons, which would decrease the officer-to-resident ratio for the Topanga Area from the current 1.2 officers per 1,000 residents to 0.8 officers per 1,000 residents. Assuming the same crimes per capita rate currently observed in the Topanga Area of 0.0006 crime per capita, the Project and related projects could generate an additional 42 crimes per year. The estimated 13 Project-generated crimes would represent approximately 31 percent of the cumulative growth in potential crimes. However, as previously discussed, the Project would implement Project Design Features J.1-1 through J.1-8 and Warner Center Plan

Mitigation Measures PS-16, PS-17, and PS-19 to reduce reliance on LAPD services, and thus is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site.

Furthermore, it is anticipated that the related projects would implement project design features similar to the Project, which would reduce cumulative impacts to police protection services. Additionally, each related project would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, the LAPD would also continue to monitor population growth and land development throughout the City for the purpose of evaluating existing and future police protection needs, as specified by Objective 9.13 and Policy 9.13.1, and provide adequate police services, facilities, equipment, and personnel are available to meet such needs, as required by Objective 9.14.

With regard to response times, the Project and related projects would introduce new uses to the Topanga Area, which would generate additional traffic in the Topanga Area. Traffic from the Project and related projects would have the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Furthermore, it is anticipated that similar to the Project, related projects would implement project design features and mitigation measures to reduce intersection impacts and traffic congestion. Therefore, the Project together with related projects would result in a less than significant cumulative impact on emergency response times, and the Project's contribution would not be cumulatively considerable.

Based on the above, operation of the Project together with related projects would result in a less-than-significant cumulative impact to police protection services, and the Project's contribution would not be cumulatively considerable.

c. Project Design Features

The following project design features are proposed to provide private, on-site security for the Entertainment and Sports Center and overall Project Site to reduce reliance on public police protection services.

For Entertainment and Sports Center:

Project Design Feature J.1-1: Security personnel shall be on duty at the Entertainment and Sports Center during all hours of operation and before and after events, with the exact time period to be determined with LAPD in a Security Plan based on the size and type of event. During such time, the security personnel shall patrol the property to identify and minimize unusual disturbances, and to assist and report to the proper authorities any loitering, trespassing or any other criminal activities in the general vicinity of the property.

Project Design Feature J.1-2: A Security Plan shall be developed and implemented by the Applicant in consultation with the LAPD and LAFD outlining the security services and features to be provided in conjunction with the proposed Entertainment and Sports Center. The Security Plan shall ensure appropriate public safety and security deployment by the Applicant based upon identified, objective standards, including, but not limited to: anticipated crowd size, historical data associated with crowd or fan behavior, event type, etc. The Security Plan shall be sufficiently flexible to be responsive to the type and size of events at the Entertainment and Sports Center. The Security Plan may include but is not limited to identification of the following:

- A private on-site security force, with the number of security officers identified based on event size;
- Pedestrian, vehicular, and/or bicycle patrols during operational hours;
- Security procedures for initial response, investigation, detainment of crime suspects, LAPD notification, crowd and traffic control, and general public assistance;
- Planned routes for emergency service personnel and vehicles to access the Entertainment and Sports Center;
- Secure staging locations, within the Project Site, for first responders;
- A First Responder Communications Plan, prepared in consultation with LAPD and LAFD;
- Provision to LAPD and LAFD of detailed diagrams of the Entertainment and Sports Center, including access routes, floor plans, and any information that would facilitate police response;
- Closed-circuit television surveillance system, for both inside and outside the Entertainment and Sports Center, which recordings shall remain available for review by LAPD for at least 30 days; and

- Installation of locks and alarms on entryways where appropriate.

Project Design Feature J.1-3: The Security Plan shall be updated from time to time based on information that may be learned during operation of the Entertainment and Sports Center.

Project Design Feature J.1-4: An Emergency Procedures Plan shall be established and implemented by the Applicant in conjunction with the proposed Entertainment and Sports Center. The Emergency Procedures Plan shall outline employee guidelines and procedures in the event of fire, medical emergency, civil disturbance, injuries to multiple individuals, evacuation, and other types of emergencies. The Plan shall be subject to review by the LAPD and LAFD. This Emergency Procedures Plan shall also include an Emergency Medical Response Plan developed by the Applicant in consultation with the LAFD, outlining the first aid and medical services and the safety features to be provided by the Applicant during events. The plan shall be subject to review by the LAFD.

Project Design Feature J.1-5: A phone number to a responsible representative of the Applicant shall be conspicuously posted on the premises for the purposes of reporting an emergency or a complaint about the method of operation of the Entertainment and Sports Center. A complaint log shall be maintained and be made available to the City upon request.

For Overall Project Site:

Project Design Feature J.1-6: In order to maintain high levels of safety for employees, patrons, residents and visitors during Project operation, on-site security consisting of personnel and equipment would be provided. On-site security presence would be implemented based on the anticipated day-to-day levels of activity and would be increased during peak shopping days. During each shift, security personnel would be assigned to foot patrol, bike patrol and golf cart/vehicle patrol, in order to cover the common areas of the site. Duties of the security personnel would include, but not be limited to, the following:

- Assisting with patron access and monitoring entrances and exits,
- Managing and monitoring fire/life/safety systems,
- Patrolling the perimeter of the property,
- Controlling and monitoring activities in the parking facilities; and
- Controlling and monitoring activities in spaces open to the public.

Project Design Feature J.1-7: Security Programs and Equipment: An enhanced security program would be implemented. Security system features to be installed on-site as part of this enhanced security program include industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas. Closed-circuit television (CCTV) would be installed at locations consistent with industry standards. These locations would include all exit points, play areas, family rest areas, food courts, loading docks, and parking areas/structures. CCTV access would be available to the local police station via secure internet with future consideration of wireless secure transmission. Additionally, license plate recognition (LPR) cameras would be located strategically throughout the property.

Project Design Feature J.1-8: Crime Prevention Design: The Project Applicant shall consult with the LAPD regarding crime prevention features appropriate to the design of the Project. Such features would include, but not be limited, to:

- Landscaping to be planted in a manner that does not provide obvious cover for persons tampering with doors or windows of commercial facilities, or for persons lying in wait for pedestrians or parking garage users,
- Lighting of parking structures, elevators, and lobbies to reduce areas of concealment,
- Lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings,
- Design of public spaces to be easily patrolled and accessed by safety personnel,
- Parking facilities easily patrolled and accessed by safety personnel,
- Implementing public safety measures in parking facilities; and
- Graffiti deterrent measures, where possible.

Project Design Feature J.1-9: An Emergency Procedures Plan shall be established and implemented by the Applicant for the Project's other buildings. The Emergency Procedures Plan shall outline employee guidelines and procedures in the event of fire, medical emergency, civil disturbance, injuries to multiple individuals, evacuation, and other types of emergencies. The Plan shall be reviewed and approved by the LAPD and LAFD. This Emergency Procedures Plan shall also include an Emergency Medical Response Plan developed by the Applicant in consultation with the LAFD, outlining the first aid

and medical services and the safety features to be provided by the Applicant. The Plan shall be subject to review by the LAFD.

d. Mitigation Measures

Project-level impacts to police protection services during construction and operation of the Project would be less than significant. Nonetheless, the mitigation measures set forth in the Warner Center Plan EIR, and listed below, would be implemented as part of the Project. With regard to Warner Center Plan Mitigation Measure PS-15, the mitigation measure is not specific for the Project to implement, but rather a mitigation measure for the City to implement and would not be applicable to the Project. In addition, with regard to Warner Center Plan Mitigation Measure PS-18, the LAPD Crime Prevention Unit no longer provides additional design features, and this mitigation measure is no longer applicable to the Project. No additional mitigation measures are required.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

~~**Warner Center Plan Mitigation Measure 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.~~

[This mitigation measure is not applicable to the Project as this mitigation measure is for the City to implement.]

Warner Center Plan Mitigation Measure 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 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 need. These measures shall be approved by the LAPD prior to the issuance of building permits.

Warner Center Plan Mitigation Measure 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.

~~**Warner Center Plan Mitigation Measure 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 final Certificate of Occupancy for the project.~~

[This mitigation measure is no longer implemented by LAPD and is therefore not applicable to the Project.]

Warner Center Plan Mitigation Measure 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.

e. Level of Significance After Mitigation

Police protection services during construction and operation of the Project would be less than significant without project-level mitigation. Additionally, implementation of the Warner Center Plan Mitigation Measures PS-12 through PS-14, and PS-16, PS-17, and PS-19 would further reduce impacts to police protection services. The mitigation measures would also reduce cumulative impacts to police protection services from the Project and related projects to less-than-significant levels.

J.2. Public Services—Fire Protection

a. Analysis of Project Impacts

(1) Construction

Construction activities have the potential to result in accidental on-site fires by exposing 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. OSHA has developed safety and health provisions for implementation during construction, according to which construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Project construction would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Construction of the Project could also potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, as discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, most of the construction worker trips and haul truck trips would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, the Applicant would prepare and submit a Construction Management Plan to the City of Los Angeles Department of Transportation prior to the start of construction pursuant to Mitigation Measure K-1 included in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, construction of the Project would not cause substantial delays and disruption of existing traffic flow during construction.

Based on the above, impacts to fire protection and emergency medical services during construction of the Project would be less than significant, and no mitigation measures are required.

(2) Operation

(a) Facilities and Equipment

The Project Site is currently and would continue to be served by Fire Station No. 84, which is the “first-in” station for the Project Site, located approximately one mile southeast of the Project Site. Fire Stations No. 105 and No. 72, located approximately 1.3 miles northwest and 1.5 miles northeast of the Project Site, respectively, would continue to be available to serve the Project Site in the event of an emergency.

The development of 1,432 residential units would result in an increase of approximately 3,714 residents. In addition, the Project’s 572 hotel rooms, approximately 244,000 square feet of retail, approximately 629,000 square feet of office space, an Entertainment and Sports Center approximately 320,050 square feet and 15,000 seats in size, and the approximately 64,000 square feet of the work portions of work/live units would generate approximately 3,048 net new employees. Therefore, the Project’s population would increase the demand for LAFD fire protection and emergency medical services compared to existing conditions.

Based on the heights of the proposed towers, pursuant to LAMC Section 57.4705.4, the Project would be required to provide a rooftop emergency helicopter landing facility for those buildings that are over 75 feet in height, unless certain life safety features, as specified by the LAFD, are provided. In addition, the Project would implement applicable Los Angeles Building Code and Los Angeles Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc., including as identified by LAFD in their letter to the Department of City Planning, provided in Appendix L of this Draft Supplemental EIR, as well as Project Design Features J.2-1 and J.2-2. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit.

Compliance with applicable regulatory requirements, including LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. In addition, in accordance with the fire protection-related goals, objectives, and polices set forth in the Framework Element, the Safety Element, and the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities (Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Policy 9-1.1 of the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan) and coordinate the development of new fire facilities to be phased with

growth (Objective 9.18 of the Framework Element). Therefore, given LAFD's fire/life safety plan review, LAFD's fire/life safety inspection, and LAFD's continued evaluation of existing fire facilities, impacts with regard to LAFD facilities and equipment would be less than significant.

Furthermore, as described in Subsection 3.b., consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the obligation to provide adequate fire and emergency medical services is the responsibility of the City. Thus, the need for additional fire protection services is not an environmental impact that CEQA requires a project applicant to mitigate.

(b) Response Distance and Emergency Access

Based on the distance of the nearest fire station to the Project Site, the Project Site is located outside of the response distance of 0.75 mile for an engine company and 1 mile for a truck company. Therefore, pursuant to the requirements of Section 57.507.3.3 of the LAMC and various provisions of the 2016 California Building Standards Code, the Project would install automatic fire sprinklers in all proposed buildings.

Vehicular access to the Project Site, including access for emergency vehicles, would be provided via two New Streets (as defined in the Warner Center Plan) connecting three public street frontages. Additional private streets within the Project Site are also proposed. The implementation of New Streets and private streets within the Project Site would enhance access throughout the Project Site by providing direct access to the various buildings proposed. In addition, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit. As such, emergency access to the Project Site and surrounding uses would be maintained and Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

With regard to response times, Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by traffic. However, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets which provide regional, sub-regional, and local

access and circulation within the Project's traffic study area. As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, upon buildout of the Project (Future With Project Conditions) and with implementation of the Warner Center Plan's transportation mitigation program assumed in the Warner Center Plan EIR, traffic generated by the Project would not result in significant impacts. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, as further discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, the Project is adding an additional lane on Topanga Canyon Boulevard, adjacent to the Project Site, to further improve the flow of vehicles (including emergency vehicles) into the Project Site. In light of these factors, the increase in traffic generated by the Project would not significantly impact emergency vehicle response times to the Project Site and surrounding area.

Overall, impacts with regard to response distance, emergency access, and response times would be less than significant.

(c) Fire Flow

Domestic and fire water service to the Project Site would continue to be supplied by the Los Angeles Department of Water and Power (LADWP). Fire flow to the Project would be required to meet City fire flow requirements. Eight hydrants flowing simultaneously for a combined flow of 16,000 would be available for Project use. This is greater than the 12,000 gallons per minute (gpm) required at a minimum residual pressure of 20 pounds per square inch (psi).²⁶ Therefore, the Project would comply with flow standards specified in Section 57.507.3.1 of the LAMC. Impacts with regard to fire flow would be less than significant.

b. Cumulative Impacts

Cumulative growth in the greater Project area through 2033 includes 29 known development projects, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft Supplemental EIR.

²⁶ While the corrected letter provided by LAFD on April 11, 2017, as provided in Appendix L of this Draft Supplemental EIR, specifies that the required fire flow for this Project is set at 6,000 gpm to 9,000 gpm from four to six fire hydrants flow simultaneously, to provide a conservative analysis for the Draft Supplemental EIR, the Project fire flow was analyzed against the more stringent requirement of 12,000 gpm for High Density Industrial and Commercial land uses.

A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station No. 84, No. 105, and No. 72. The increase in development and residential service populations from the Project and related projects would result in a cumulative increase in the demand for LAFD services and could have a cumulative impact on fire services if the Project, together with other development in the service area, did not comply with LAFD requirements for design and construction. However, similar to the Project, the related projects would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection and emergency medical services. Furthermore, each related project would be required to comply with regulatory requirements related to fire protection and emergency medical services. Each related project and other future development that exceeds the maximum applicable LAMC response distance standards would be required to install automatic fire sprinkler systems in order to compensate for the additional response distance.

In addition, the Project and each related project would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Furthermore, given that the Project Site is located within an urban area, each of the related projects identified in the area would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. Furthermore, over time, LAFD would also continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service.

Based on the above, the Project's contribution to cumulative impacts to fire protection and emergency medical services would not be cumulatively considerable. Additionally, cumulative impacts on fire protection and emergency medical services would be less than significant.

c. Project Design Features

Section IV.J.1, Public Services—Police Protection, of this Draft Supplemental EIR, includes Project Design Features J.1-2, J.1-4, and J.1-9 which would reduce impacts for both police protection and fire protection. Specifically, Project Design Feature J.1-2 requires preparation of a Security Plan that would be developed in consultation with LAPD and LAFD outlining the security services and features to be provided in conjunction with the proposed Entertainment and Sports Center. In addition, Project Design Features J.1-4 and

J.1-9 require the development of an Emergency Procedures Plan for both the Entertainment and Sports Center and the Project's other buildings that would outline employee guidelines and procedures in event of fire, medical emergency, civil disturbance, injuries to multiple individuals, evacuation, and other times of emergencies. The Emergency Procedures Plan would be subject to review by LAPD and LAFD. Additionally, as discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, pursuant to Mitigation Measure K-1, the Project Applicant would implement a Construction Management Plan that would include provisions to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

d. Mitigation Measures

Project-level and cumulative impacts with regard to fire protection and emergency medical services would be less than significant. No project-level mitigation measures would be necessary. Nonetheless, the mitigation measures set forth in the Warner Center Plan EIR, and listed below, would be implemented as part of the Project. No additional mitigation measures are required. As discussed above, an Information of Fire Flow Availability Request was submitted to LADWP to determine available fire hydrant flow from the existing public fire hydrants and the results are provided in *the Promenade 2035 Utility Technical Report: Water, Wastewater, and Energy* (Utility Report), included in Appendix P of the Draft Supplemental EIR. Therefore, Warner Center Plan Mitigation Measure PS-11 is no longer required. The Warner Center Plan Mitigation Measures are modified as indicated by ~~strikethrough~~ for deletions and underline for additions.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure PS-2: The City shall require that applicants of the individual projects developed as part of the WCRCCSP 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.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure PS-4: The City shall require that all applicants within the WCRCCSP area consult with the Fire Department and incorporate fire prevention and suppression features appropriate to the design of each project.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure PS-8: The City shall require that during the construction phase of each project, emergency access shall remain clear and unobstructed.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

~~**Warner Center Plan Mitigation Measure PS-11:** The City shall require a Fire Flow analysis to be prepared for all projects within the WCRCCSP. 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 WCRCCSP 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.~~

[A fire flow analysis has been completed and is included in the Utility Report, provided in Appendix P of this Draft Supplemental EIR.]

e. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to fire protection and emergency medical services would be less than significant without mitigation. Additionally, implementation of Warner Center Plan Mitigation Measures PS-1 through PS-10 would further reduce impacts to fire protection and emergency medical services.

J.3. Public Services—Schools

a. Analysis of Project Impacts

(1) Construction

The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding increase in demand for schools in the vicinity of the Project Site. Impacts on school facilities during Project construction would be less than significant.

(2) Operation

The Project would directly generate students from the population growth due to the 1,432 new multi-family residential units as well as Project employees. Using the applicable LAUSD student generation rates for the Project's land uses, the Project would result in a total net increase of approximately 1,459 school age students consisting of 791 elementary students, 215 middle school students, and 453 high school students.

Based on existing enrollment and capacity data from LAUSD, Hamlin Street Charter Academy School and Canoga Park Senior High School would not have adequate existing capacity to serve the Project under existing conditions. However, Woodland Hills Academy Middle School would have adequate capacity to accommodate the new students generated by the Project under existing conditions. Specifically, based on the total net new Project-generated students, Woodland Hills Academy Middle School would have a seating overage of 178 students, while Hamlin Street Charter Academy School and Canoga Park Senior High School would have a seating shortage of 833 and 986 students, respectively.

With regard to the projected future capacity during the 2020–2021 academic year (the closest year to the Project buildout year for which projected enrollment and capacity data are available), Hamlin Street Charter Academy School and Canoga Park Senior High School would continue to experience seating shortages with the addition of Project-generated students (projected seating overages reported from LAUSD minus Project-generated students). However, Woodland Hills Academy Middle School would continue to have adequate capacity to accommodate the Project-generated students. Specifically, Hamlin Street Charter Academy School would have a seating shortage of 922 students and Canoga Park Senior High School would have a seating shortage of 1,109 students, while Woodland Hills Academy Middle School would have a seating overage of 33 students.

Pursuant to SB 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, with payment of the applicable school fees per SB 50, impacts on schools would be less than significant, and mitigation measures would not be required.

b. Cumulative Impacts

As identified in Section III, Environmental Setting, of this Draft Supplemental EIR, there are 29 related projects located in the Project vicinity. Of the 29 related projects, 26 are located within the attendance boundaries of Hamlin Street Charter Academy School, Woodland Hills Academy Middle School, and/or Canoga Park Senior High School. Based on the rates provided in the 2016 LAUSD Developer Fee Justification Study, the Project in combination with the 26 applicable related projects would have the potential to generate a cumulative total of 4,306 new school-aged students. This cumulative total would consist of 1,070 elementary school students, 1,232 middle school students, and 2,004 high school students. Students generated by the Project in combination with the related projects located within the school attendance boundaries would cause a shortage when compared to existing conditions and projected future capacities of the resident schools serving the Project area.

As with the Project, future development, including the related projects, would be required to pay development fees for schools to LAUSD prior to the issuance of building permits pursuant to SB 50. Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the related projects. Therefore, with payment of these fees, the Project and related projects would have a less than significant cumulative impact.

c. Project Design Features

No project design features are proposed with regard to schools.

d. Mitigation Measures

Project-level and cumulative impacts with regard to schools would be less than significant with the payment of development fees to LAUSD prior to the issuance of building permits. Nonetheless, as set forth in the Warner Center Plan EIR, the following mitigation measure would be implemented as part of the Project to ensure that Project impacts on schools are less than significant.

Warner Center Plan Mitigation Measure PS-20: For projects developed under the WCRCCSP, 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.

e. Level of Significance After Mitigation

Consistent with the Warner Center Plan EIR, Project-level and cumulative impacts related to schools would be less than significant prior to mitigation with payment of fees, however the above mitigation measure would be implemented as part of the Project to ensure that Project impacts on schools are less than significant.

J.4. Public Services—Parks and Recreation

a. Analysis of Project Impacts

(1) Impacts on Existing Facilities

(a) Construction

Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project vicinity, or a corresponding

permanent demand for parks and recreational facilities in the vicinity of the Project Site. The use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. In addition, use of haul routes would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. Thus, based on the above, impacts on parks and recreational facilities during Project construction would be less than significant, and mitigation measures would not be required.

(b) Operation

The Project's residential units would introduce an estimated 3,714 new residents. The population increase associated with the Project would generate additional demand for parks and recreational facilities in the Project vicinity. The Project would provide a total of approximately 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres. This includes the approximately 60,000 square foot Promenade Square, approximately 48,000 square feet of required setbacks, the Gardens comprising approximately 22,000 square feet, approximately 32,000 square feet of additional large open space areas, and approximately 84,000 square feet of landscaped open space pathways through the Project Site. Additionally, the Project would provide approximately 5 acres of private rooftop open space for the Project's residential, office and hotel uses. This includes approximately 165,000 square feet of residential common outdoor open space, 14,000 square feet of creative office outdoor open space, and 41,000 square feet of hotel outdoor open space. The Project's proposed open space would exceed the residential open space requirement of Section 12.21G of the LAMC by 256,675 square feet. In addition, the Project would exceed the publicly accessible open space requirement set forth in the Warner Center Plan.

Due to the amount, variety, and availability of the proposed open space and recreational amenities, the Project would not substantially increase the demand for off-site public parks and recreational facilities.

(2) Consistency with Regulations

(a) Public Recreation Plan

The Project would include 466,000 square feet (approximately 10.6 acres) of total open space areas, including approximately 246,000 square feet of publicly accessible open space at grade and approximately 220,000 square feet private open space for residential, office, and hotel uses, which would consist of a variety of open space features and

recreational amenities. While the Project's open space would fall short of the Public Recreation Plan's guidelines for neighborhood sites and facilities, community sites and facilities, and regional recreational sites and facilities, the Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Additionally, the approximately 5.6 acres of ground-level publicly accessible open space within the Project Site would provide a contribution to neighborhood and community park sites and facilities in the Project vicinity.

Furthermore, compliance with regulatory requirements would ensure that the intent of the Public Recreation Plan's parkland guidelines would be met through compliance with State law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Such requirements include the provision of on-site open space, and payment of the Dwelling Unit Construction Tax.

(b) Los Angeles Municipal Code

Section 12.21G of the LAMC requires that residential developments containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required to provide a total of 154,325 square feet of usable open space. The Project would provide a total of 411,000 square feet of usable open space. Thus, the Project would exceed the LAMC's requirements for the provision of usable open space by 256,675 square feet. Additionally, pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the Project would pay a tax of \$200 per dwelling unit on the construction of all new dwelling units, which funds would be placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites.

(c) Warner Center 2035 Plan

The Warner Center Plan requires that a Project provide Publicly Accessible Open Space equal to 15 percent of the net site area, and provides a 50 percent credit for projects that create New Streets.²⁷ Based on the 1,439,222 square foot net lot area of the Project Site after dedication, 215,883 square feet of Publicly Accessible Open Space would be required for the site. The Project incorporates two New Streets connecting three public street frontages and dividing the Project into smaller development blocks for easier pedestrian circulation throughout the area. Therefore, 50 percent of the Publicly Accessible Open Space (PAOS) would be credited to the site, for a remaining requirement of

²⁷ "New Streets" are defined by the Warner Center Plan as a network of private streets, which are publicly accessible and must intersect the public street system. In accordance with Section 6.2.5.2.1(i) of the Warner Center Plan, open public access and right of travel would be provided at all times.

107,941 square feet of PAOS. The perimeter setback areas are permitted to be counted as PAOS and total 48,000 square feet. Therefore, the Project's remaining requirement would be 59,941 square feet of Publicly Accessible Open Space. The Project would meet this requirement, and the requirement for a focal point or gathering space of at least 500 square feet under the Warner Center Plan, by providing the Promenade Square, a single landscaped open space area comprised of approximately 60,000 square feet. In addition, the Project includes approximately 104,000 square feet of large open spaces on grade (not including setback areas), approximately 14,000 square feet of pedestrian adapted pathways, and approximately 84,000 square feet of landscaped pathways (including pedestrian adaptive pathways, but not including sidewalks adjacent to New Streets).

Centrally located in a visible location and accessible from the Project's New Streets, private streets, and pedestrian pathways, Promenade Square would be open to sky, contiguous and integrated into the design of the Project, consistent with the Warner Center Plan. Promenade Square would be open from at least 6 A.M. to 10 P.M., seven days a week, also consistent with the Warner Center Plan. In addition, the Promenade Square would include trees, shrubs, and areas for passive and active recreational uses comprising over 50 percent landscaping, consistent with the Warner Center Plan. A minimum of 115 seats would also be provided within the Publicly Accessible Open Space, consistent with the Warner Center Plan's specified requirement of one seat per every 500 square feet of Publicly Accessible Open Space provided. In compliance with the Warner Center Plan, the Applicant would record a covenant prior to the issuance of building permits to ensure that Promenade Square would be maintained in good condition and made available and accessible to the public. The Promenade Square would also contain a central field area that serves as a focal point and gathering space of at least 500 square feet consistent with the Warner Center Plan.

(d) Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan

The majority of the objectives and policies of the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan regarding parks and recreation are applicable to the City, and not to individual development Projects. However, the Project would support Objective 5-1 and Policy 5-1.3, as well as the overall objective of the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan to increase the amount of open space, through the provision of on-site open space, recreational amenities, and landscaping, and would offset the demand that would be generated by Project residents and employees for public parks and recreational facilities. As such, the Project would not conflict with the parks and recreation policies of the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan and project impacts would be less than significant.

(3) Conclusion

Based on the analysis above, impacts to parks and recreational facilities would be less than significant and no mitigation measures are required.

b. Cumulative Impacts

There are 29 identified related projects, as well as ambient growth, that fall within a two-mile radius of the Project Site, the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities. The Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan area is currently underserved when considering the desired parkland guidelines provided in the Public Recreation Plan. As the population continues to grow in the Project Site vicinity, increased demand would lower the existing parkland to population ratio if new facilities are not constructed.

As with the Project, the related projects would undergo discretionary review on a case-by-case basis and would be expected to coordinate with the Department of Recreation and Parks. Future development projects would also be required to comply with the park and recreation requirements of Sections 12.21, 17.12, 12.33, and 21.10.3(a)(1) of the LAMC, as applicable. Compliance with those requirements would mitigate potential park and recreational facility impacts associated with the construction and operation of these related projects. As such, cumulative impacts to parks and recreational facilities would be less than significant.

c. Project Design Features

No specific project design features beyond the open space and recreation features described in Section II, Project Description, of this Draft Supplemental EIR are proposed with regard to parks and recreation.

d. Mitigation Measures

Project-level and cumulative impacts with regard to parks and recreational facilities would be less than significant with compliance with applicable regulatory requirements. Nonetheless, as set forth in the Warner Center Plan EIR, the following mitigation measure would be implemented as part of the Project to ensure that such impacts would be less than significant. As the Project does not include a residential subdivision, i.e. condominiums, the mitigation measure has been amended accordingly. The specific modifications to the mitigation measure are included with deletions shown in ~~strikeout~~ and additions shown in underline.

Warner Center Plan Mitigation Measure PS-21: The City shall require that project applicants comply with the open space regulations of the Warner Center Specific Plan 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 area including for example within opportunity areas along the Los Angeles River.

e. Level of Significance After Mitigation

Consistent with the Warner Center Plan EIR, Project-level and cumulative impacts related to parks and recreational facilities would be less than significant.

J.5. Public Services—Libraries

a. Analysis of Project Impacts

(1) Construction

Construction of the Project would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of construction of the Project. Therefore, Project-related construction workers would not result in a notable increase in the resident population within the service area of the Woodland Hills Branch Library or a corresponding demand for library services in the vicinity of the Project Site. Additionally, any increase in usage of the libraries serving the Project Site by construction workers is anticipated to be negligible. As such, impacts to library facilities during construction of the Project would be less than significant, and no mitigation measures are required.

(2) Operation

The Project Site is located within the service area of the Woodland Hills Branch Library. The Project would generate approximately 3,714 residents on the Project Site, which would increase the Project Site's demand for library services. The Woodland Hills Branch Library would not meet the building size recommendations (i.e., 14,500 square feet for a service population over 45,000) set forth in the 2007 Branch Facilities Plan under

future conditions. However, the Woodland Hills Branch Library would not reach the population of 90,000, when the Los Angeles Public Library (LAPL) recommends provision of an additional branch library.

Although outside the two-mile service radius, the LAPL identified the Canoga Park Branch Library and the Platt Branch Library as facilities that could also provide library services to the Project Site and alleviate the demand placed on the Woodland Hills Branch Library from Project residents.²⁸ The Project's residential units would also be equipped to receive individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. Furthermore, as provided in Project Design Feature J.5-1, each of the residential buildings would include an 800-square-foot library room available for use by residents.²⁹ The library room would provide access to computers, internet, periodicals, books for loan, and seating areas and tables. In addition, LAPL provides access to a variety of web-based collections, reducing the demand for physical library locations. Library patrons also have access to podcasts, language learning programs, instructional content, and electronic editions of newspapers and magazines through smartphone applications made available to library cardholders. As such, the Project would not conflict with or impede implementation of the objective and policy related to libraries in the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan.

The Project's land uses would generate approximately 4,530 new employees on the Project Site. New employment opportunities associated with Project uses would include a range of full-time and part-time positions that would be typically and primarily filled by persons already residing in the vicinity of the Project Site, and who already generate a demand for library services within the service boundaries of the Woodland Hills Branch Library, Canoga Park Branch Library, and the Platt Branch Library. In addition, other employees generated by the Project not currently residing in the vicinity of the Project Site would be more likely to use library facilities near their homes during non-work hours. Furthermore, any new employees generated by the Project who would move to the Project Site area would fill existing vacant units already accounted for in library service boundaries. Employees at the Project Site would also have internet access, which provides information and research capabilities and reduces the demand at physical library locations. Therefore, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services.

²⁸ *L.A. CEQA Thresholds Guide, Section K.5, pg. K.5-2.*

²⁹ *At approximately 800 square feet of library space per residential building, the Project Site at buildout would have approximately 3,200 square feet of library facilities located throughout four residential buildings. As the anticipated residential population at buildout is approximately 3,714 people, this would result in slightly less than one square foot of library space per resident.*

Based on the above, impacts on library facilities during operation of the Project would be less than significant, and no mitigation measures are required. Nonetheless, the Project would implement Warner Center Plan Mitigation Measure PS-22, which requires the Project to offset the burden on existing libraries by either: (1) paying a fee based on an established nexus between the new development, demand and the need for additional personnel and facilities; (2) providing on-site facilities commensurate with the demand generated; or (3) some combination of the above. This would ensure that impacts to library services would be less than significant.

b. Cumulative Impacts

There are 29 related projects located in the vicinity of the Project Site. Of these, 21 are residential in nature or have residential components. The residential population of a library's service area is the primary metric used by the LAPL for assessing the adequacy of library services and planning for future growth. Implementation of the 21 applicable related projects and the Project would add a total of 26,017 residents to the Woodland Hills Regional Branch Library's future 2033 service population of 75,148 residents, for a future service population of 101,165 residents. Assuming that residents from all 21 applicable related projects would utilize the Woodland Hills Branch Library, the future service population would warrant the addition of a new branch library pursuant to the library sizing standards recommended in the 2007 Branch Facilities Plan

However, this estimate is conservative considering that all three libraries in the Project vicinity would provide library services to the 26,017 service population generated by the Project and the related projects, and not all the new residents would utilize the three libraries equally. Residents from eight of the related projects (Related Project Nos. 5, 14, 16, 17, 18, 19, 20, and 28) would reside closer to the Canoga Park Branch Library. Similarly, residents from two of the related projects (Related Project Nos. 2 and 11) would reside closer to the Platt Branch Library as compared to the Woodland Hills Branch Library. Therefore, these residents would be more likely to utilize the Canoga Park and Platt Branch Libraries as their primary libraries. In addition, this estimate is likely overstated as it does not consider that much of the growth associated with the Project and related projects is already accounted for in the service population projections.

In addition, as stated in the Warner Center Plan EIR, with the shift in technology from books to computers the demand for library facilities is changing. Members of LAPL have access to podcasts, audiobooks, media publications, and instructional content online

and via smartphone applications made available to library patrons.³⁰ The availability of such resources reduces the demand for physical library space.

Impacts on library facilities during operation of the Project would be less than significant as the Project's residential units would be equipped to receive internet service. In addition, the Project would provide library services on-site for Project residents, through implementation of Project Design Feature J.5-1. Furthermore, the Project would implement Warner Center Plan Mitigation Measure PS-22, which requires the Project to offset the burden on existing libraries by: (1) paying a fee based on an established nexus between the new development, demand and the need for additional personnel and facilities; (2) providing on-site facilities commensurate with the demand generated; or (3) some combination of the above. Therefore, based on the above, the Project's contribution to cumulative impacts on libraries would not be cumulatively considerable.

c. Project Design Features

The following project design feature is proposed with regard to libraries:

Project Design Feature J.5-1: The Project shall incorporate a library room of approximately 800 square feet in each residential building for use by Project residents. The library room will include computers, free internet access, periodicals, books for loan, seating areas and tables.

d. Mitigation Measures

Impacts to library services during construction and operation of the Project would be less than significant. No project-level mitigation measures would be necessary. Nonetheless, the mitigation measure set forth in the Warner Center Plan EIR, and listed below, would be implemented as part of the Project. No additional mitigation measures are required.

Warner Center Plan Mitigation Measure PS-22: The City shall require that individual projects developed within the WCRCCSP 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

³⁰ *Los Angeles Public Library, 2013 Library Facts, www.lapl.org/about-lapl/press/2013-library-facts, accessed March 17, 2017.*

demand generated; or (3) some combination of the foregoing. If any fees are collected, they should be spent within the WCRCCSP area.

e. Level of Significance After Mitigation

Project-level and cumulative impacts related to library services would be less than significant.

K. Traffic, Access, and Parking

a. Analysis of Project Impacts

(1) Construction Impacts

(a) Temporary Traffic Impacts

(i) Overlapping Construction Plan

Worker trips to and from the Project Site are anticipated to occur outside of the peak hours (i.e., arrive at the site prior to 7:00 A.M. and depart before 4:00 P.M. or after 6:00 P.M.). However, even if all construction worker trips were conservatively assumed to occur during the morning and afternoon peak periods, they would still be fewer than the trips allocated for TAZ 9 under the Warner Center Plan (2,256 morning trips and 3,841 afternoon trips). Therefore, the morning and afternoon peak-hour transportation impacts of the Overlapping Construction Plan period are included in, and consistent with, the traffic impact analysis of the Warner Center Plan EIR.

To the extent that Project construction begins prior to the implementation of the Warner Center Plan Mitigation Program, peak-hour construction transportation impacts may occur during the Overlapping Construction Plan period. The Construction Management Plan, described below under Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1, is anticipated to limit almost all haul truck activity to outside of the morning and afternoon peak hours and will identify specific actions to reduce the effects of the construction impacts where feasible. Until either the construction activity is completed or the Warner Center Plan mitigations are implemented, which would reduce impacts, construction transportation impacts are considered temporary in nature but significant.

(ii) Interim Year Construction

The Interim Year construction assumes construction of just the Southeast Area along with the concurrent operation of the Northeast, Northwest, and Southwest Areas. Worker trips to and from the Project Site are anticipated to occur outside of the peak hours (i.e.,

arrive at the site prior to 7:00 A.M. and depart before 4:00 P.M. or after 6:00 P.M.). Therefore, most, if not all construction worker trips would occur outside of the typical weekday commuter peak periods. However, even if all of these construction worker trips were conservatively assumed to occur during the morning and afternoon peak periods with the concurrent operation of the Northeast, Northwest, and Southwest Areas, this trip generation would still be fewer than the trips allocated for TAZ 9. This analysis conservatively assumes that an event at the Entertainment and Sports Center (ESC) may occur concurrently. However, as stated above, to the extent that Project construction begins prior to the implementation of the Warner Center Plan Mitigation Program, construction transportation impacts are considered temporary in nature but significant.

(b) Access and Safety Impacts

Construction activities are expected to be primarily contained within the Project Site boundaries. However, construction fences may encroach into the public right-of-way (e.g., sidewalk and roadway) adjacent to the Project Site. Additionally, while lane closures for on-site Project construction is not anticipated, some lane closures may be required for off-site street improvements or other infrastructure improvements. 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 traffic controls would be provided to direct traffic around any closures as required in the Construction Management Plan, as set forth in Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1.

The Project-site adjacent public rights-of-way along Topanga Canyon Boulevard, Owensmouth Avenue, Erwin Street, and Oxnard Street would be upgraded with improved sidewalks, landscaping, and street trees during the various Project phases. These upgrades would require temporary rerouting of pedestrian traffic as the sidewalks fronting the Project Site would be closed. While these temporary measures would not result in a significant construction traffic impact, in order to further reduce any potential impact, the Construction Management Plan would also 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), as set forth in Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1, below.

Construction activities associated with the Project could also potentially temporarily 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 nearby properties 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 Topanga Canyon Boulevard and other main connectors due to travel time delays caused by traffic during the Project's construction phase. However, 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 Applicant would prepare and submit a Construction Management Plan to LADOT prior to the start of construction pursuant to Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1, below, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate 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 right-of-ways.

Based on the above, 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.

(c) Bus/Transit Impacts

While not anticipated, temporary displacement of bus stops adjacent to the Project may occur. Coordination with public transit agencies to provide advance notification of bus stop relocations and durations would be required as part of the Construction Management Plan pursuant to Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1. With implementation of Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1, temporary impacts to bus and/or transit service would be less than significant.

(d) On-Street Parking Impacts

As discussed further in the Traffic Study, parking is not allowed adjacent to the Project Site, therefore, construction fences would not result in any temporary loss of on-street parking spaces. Therefore, impacts to on-street parking during the construction of the Project would be less than significant.

(2) Operational Impacts

(a) *Intersection Levels of Service—A.M. and P.M. Peak Hour—Weekday*

(i) *Existing with Project Conditions*

Non-ESC Uses

The addition of the Non- ESC Uses to existing conditions results in a total of eight intersections with significant impacts, prior to mitigation:

4. Canoga Avenue & Vanowen Street;
5. De Soto Avenue & Vanowen Street;
9. Owensmouth Avenue & Victory Boulevard;
10. Canoga Avenue & Victory Boulevard;
12. De Soto Avenue & Victory Boulevard;
22. Shoup Avenue & Oxnard Street;
24. Topanga Canyon Boulevard & Oxnard Street; and
41. Topanga Canyon Boulevard & Ventura Boulevard.

Full Project

The addition of the Project with sold-out events results in 12 intersections with significant impacts, prior to mitigation, of which eight overlap with the Non-ESC Use impacts. The additional four intersections with significant impacts prior to mitigation are:

27. Canoga Avenue & Oxnard Street;
33. Topanga Canyon Boulevard & Burbank Boulevard;
39. Topanga Canyon Boulevard & US-101 WB off-ramp; and
40. Topanga Canyon Boulevard & Clarendon Avenue.

Each of the significantly impacted intersections have a planned physical improvement as part of the Warner Center Plan Mitigation Program. Therefore, the significantly impacted intersections identified by these Existing with Project analyses are

anticipated to be temporary and mitigated with implementation of the Warner Center Plan Mitigation Program.

(ii) Interim Conditions

Based on the anticipated order of the Project phases, this analysis examines the potential impacts in 2027 related to the completion of Southwest Area (Phase 3), after completion of the Northeast (Phase 1) and Northwest (Phase 2) Areas, collectively Project Phases 1–3.³¹

With Non-Event Day Project Traffic

With the addition of non-Event Day traffic of Project Phases 1–3, one intersection is projected to be significantly impacted by Phases 1–3 in 2027 prior to mitigation:

22. Shoup Avenue & Oxnard Street (level of service (LOS) F)).

With Sold Out Event Day Project Traffic

With the addition of sold-out Event Day traffic to the Project Phases 1–3 conditions, two intersections are projected to be significantly impacted by Phases 1–3:

24. Topanga Canyon Boulevard & Oxnard Street (LOS F); and
27. Canoga Avenue & Oxnard Street (LOS C).

Each of the three significantly impacted intersections identified above have a planned physical improvement as part of the Warner Center Plan Mitigation Program, which would reduce impacts to less-than-significant levels. In the event that the mitigation measures associated with each of the above intersections are implemented by the City prior to operation of Phases 1–3, the above identified intersections would not be significantly impacted. In the event that the associated mitigation measures have not been implemented by the operation of Phases 1–3, then the significantly impacted intersections identified above would remain significantly impacted until implementation of the Warner Center Plan Mitigation Program.

³¹ As a note, consistent with the Traffic Study trip-generation analysis, Project Phases 1–3 are estimated to generate fewer trips than assumed by the Warner Center Plan. As such, the Project through the completion of Phase 3 is consistent with the traffic impact conclusions of the Warner Center Plan EIR.

*(iii) Future with Project Conditions*Weekday 5:00 P.M.–6:00 P.M.

The weekday 5:00 P.M.–6:00 P.M. analysis is consistent with the afternoon peak-hour analysis in the Warner Center Plan EIR and represents typical peak-hour operations. Relative to the ESC, the weekday 5:00 P.M.–6:00 P.M. period is representative of operating conditions two hours prior to a weekday evening event start of 7:30 P.M.

Non-ESC. No significantly impacted intersections are anticipated within the Study Area with full buildout of the Warner Center Plan land uses plus the Non-ESC land use elements of the Project once all of the Warner Center Plan improvements are implemented.

Full Project. The addition of the Full Project trips and the full implementation of the Event Management Plan (EMP) pursuant to Project Design Feature K-6 would result in no significantly impacted intersections. This conclusion assumes full buildout of the Warner Center Plan land uses and the implementation of the Warner Center Plan Mitigation Program.

Weekday 6:00 P.M.–7:00 P.M.

On days with an event at the ESC, the weekday 6:00 P.M.–7:00 P.M. analysis represents the estimated traffic operations in the one hour prior to a weekday evening 7:30 P.M. event start.

Non-ESC. The addition of the Non-ESC land uses to the future street network is projected to result in all 49 analyzed intersections operating at LOS D or better from 6:00 P.M.–7:00 P.M. Similarly, no significantly impacted intersections are anticipated during this time period.

Full Project. The addition of the Full Project trips, including a sold out event, and the full implementation of the EMP to the future street network are similarly projected to result in all 49 analyzed intersections operating at LOS D or better. No significantly impacted intersections are anticipated during this time period.

Weekday 10:00 P.M.–11:00 P.M.

The weekday 10:00 P.M.–11:00 P.M. analysis captures the late night conditions in the hour after the end of a weekday evening event with the departure of event attendees.

Non-ESC. The addition of the Non-ESC Uses to the future street network is projected to result in all 49 analyzed intersections operating at LOS D or better. No significantly impacted intersections are anticipated during this late night time period.

Full Project. The addition of the Full Project trips, including a sold out event, and the full implementation of the EMP to the future street network are similarly projected to result in all 49 analyzed intersections operating at LOS D or better. No significantly impacted intersections are anticipated during this late night time period.

Saturday 12:00 P.M.–1:00 P.M.

The Saturday 12:00 P.M.–1:00 P.M. analysis represents the typical midday peak conditions anticipated to occur on a Saturday. Relative to the ESC, this analysis represents a weekend condition approximately two hours prior to a Saturday daytime event start.

Non-ESC. The addition of the Non-ESC Uses to the future street network is projected to result in 48 of 49 analyzed intersections operating at LOS D or better. One intersection, Intersection No. 40, Topanga Canyon Boulevard & Clarendon Street, is projected to operate at LOS E. However, no significantly impacted intersections are projected during this time period.

Full Project. The addition of the Full Project trips, including a sold out event, and the full implementation of the EMP to the future street network are projected to result in 48 of the 49 analyzed intersections operating at LOS D or better. The intersection of Intersection No. 40, Topanga Canyon Boulevard & Clarendon Street, is projected to continue operation at LOS E. No significantly impacted intersections are projected during this time period.

Saturday 1:00 P.M.–2:00 P.M.

The Saturday 1:00 P.M.–2:00 P.M. analysis represents the typical midday conditions anticipated to occur on a Saturday. Relative to days with an event at the ESC, this analysis represents a weekend condition approximately 1 hour prior to a Saturday daytime event start.

Non-ESC. The addition of the Non-ESC Uses to the future street network is projected to result in all 49 analyzed intersections operating at LOS D or better. No significantly impacted intersections are projected during this time period.

Full Project. The addition of the Full Project trips, including a sold out event, and the full implementation of the EMP to the future street network are projected to result in all

49 analyzed intersections operating at LOS D or better. No significantly impacted intersections are projected during this time period.

Saturday 10:00 P.M.–11:00 P.M.

On nights with an event at the ESC, the Saturday 10:00 P.M.–11:00 P.M. analysis captures the late night conditions approximately one hour after the end of a Saturday evening event, with the departure of event attendees.

Non-ESC. The addition of the Non-ESC Uses to the future street network is projected to result in all 49 analyzed intersections operating at LOS D or better. No significantly impacted intersections are anticipated during the Saturday late night time period.

Full Project. The addition of the Full Project trips, including a sold out event, and the full implementation of the EMP to the future street network are projected to result in all 49 analyzed intersections operating at LOS D or better. No significantly impacted intersections are anticipated during this time period.

(b) Regional Transportation System

(i) Congestion Management Program (CMP) Freeway Segment Analysis

As discussed further in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, on non-event days, the Project is estimated to generate approximately 36 percent to 56 percent fewer trips than analyzed by the Warner Center Plan and on sold out event days, approximately 22 percent to 24 percent fewer trips are estimated to be generated during the peak hours. In addition, with regard to LOS, the Project, under both Non-ESC and Full Project Conditions, is not anticipated to result in significantly impacted intersections in the Study Area during 5:00 P.M. to 6:00 P.M. peak hour, which is analyzed by the CMP, assuming the full implementation of the Project's EMP along with all planned intersection improvements identified in the Warner Center Plan. The Project is consistent with the Warner Center Plan EIR analysis and conclusions. Thus, similar to the Warner Center Plan, impacts to the CMP arterial monitoring stations analyzed in the Warner Center Plan, including the CMP monitored intersections closest to the Project Site (i.e., Topanga Canyon Boulevard and Victory Boulevard and Topanga Canyon Boulevard and Ventura Boulevard), would be less than significant under the Project.

(ii) Public Transit

Prior to transit reduction adjustments, at full buildout during a two-hour period prior to event conditions, the Project is anticipated to generate approximately 2,224 morning peak-hour

trips and 3,474 afternoon peak-hour trips. Assuming an average vehicle ridership (AVR) of 1.4 (based on the CMP), vehicle trips result in an estimated increase of 3,113 person trips during the morning peak hour and 4,864 person trips during the afternoon peak hour. Using the 12-percent mode split, the Project would generate approximately 374 transit trips in the morning peak hour and 583 transit trips in the afternoon peak hour, which are approximately 18 percent and 29 percent of the total residual capacity of the bus lines within the Study Area during morning peak (2,093 transit trips) and afternoon peak (2,046 transit trips), respectively.

The Project Site is served by numerous bus lines, including the new Warner Center circulator. Beginning June 2018, the new Warner Center circulator would connect to the Metro Orange Line, which will maintain comparable service frequency to the Metro Orange Line currently provided at the Project Site. Overall, the total transit capacity along the routes of those lines can accommodate the Project's transit trips. Therefore, the Project impact to the regional transit system is anticipated to be less than significant.

(c) Neighborhood Intrusion/Residential Street Segments

Transportation Impact Study Guidelines provides criteria for neighborhood impacts relative to residential streets. However, a majority of the streets in the potentially affected areas identified below, as potential neighborhood cut through routes, are designated as collector streets (not residential streets) in *Mobility Plan 2035, An Element of the General Plan*, Los Angeles Department of City Planning, January 2016) (Mobility Plan 2035). By definition of their function, collector streets are designed to carry a moderate volume of traffic as they are intended to facilitate traffic movement between arterial streets (higher volume) and local streets (lower volume). Traffic utilizing a collector street is, therefore, not typically considered to be cut through traffic. Likewise, Project traffic utilizing collector streets is not anticipated to cause significant neighborhood street impacts. To provide a conservative analysis, however, the collector streets in the neighborhoods identified below were analyzed with the residential street criteria despite their collector street designation.

On the basis of the above investigation and assumptions, five neighborhoods were identified that may be subject to significant neighborhood intrusion impacts upon completion of the Project. They include the areas generally bounded by the following:

- Kittridge Street to the north, Topanga Canyon Boulevard to the east, Victory Boulevard to the south and Randi Avenue to the west.
- Victory Boulevard to the north, Glade Avenue to the east, Erwin Street to the south, and Randi Avenue/Shoup Avenue to the west.
- Erwin Street to the north, Glade Avenue to the east, Oxnard Street to the south and Nevada Avenue to the west.

- Oxnard Street to the north, Farralone Avenue to the east, Burbank Boulevard to the south and Shoup Avenue to the west.
- Residential uses north and south of Oxnard Street between De Soto Avenue and Oso Avenue, residential uses north and south of Clark Street between Oso Avenue and Winnetka Avenue and residential uses east and west of Oso Avenue between Oxnard Street and Clark Street.

This analysis conservatively analyzed the collector streets in the neighborhoods identified above as if they are residential streets for purposes of the neighborhood street segment analysis. Any significant impacts identified through the process above could potentially be mitigated to less-than-significant levels through approval of a neighborhood protection program, as detailed in Warner Center Plan Mitigation Measure TR-101 and Mitigation Measure K-2, below. Warner Center Plan Section 8 establishes the Neighborhood Protection Program, and the Mobility Fee collected from the Project will finance the Warner Center Plan Mitigation Program, which includes neighborhood protection components. However, should significant impacts be identified and a neighborhood traffic management plan not be approved by the community, then significant Project-level neighborhood street segment impacts in the identified neighborhoods would remain significant.

(d) Access and Circulation

The Project is proposed to provide four primary signalized driveways,³² as well as nine minor driveways along the Project Site's periphery. These minor driveways would be controlled by stop-signs and restricted movements (i.e., right-turn in and out) from the public street network. All new driveways would be designed according to LAMC and LADOT standards, and thus would not increase hazards due to design features. They would not conflict with adopted City policies or plans for alternative transportation as they would not conflict with any bus turnouts or bicycle facilities.

Based on the *L.A. CEQA Thresholds Guide*, a project would have a significant impact on project access if the intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the A.M. or P.M. peak hours under Future with Project conditions. None of the intersections nearest the primary site access or signalized Project driveways are projected to operate at LOS E or F during the A.M. or P.M. peak hours under Future with Project conditions. Therefore, based on the above, Project impacts with regard to access and circulation would be less than significant.

³² *The primary signalized driveways include: Warner Drive North & Erwin Street, Owensmouth Avenue & Promenade Boulevard, Warner Drive South & Oxnard Street, and Topanga Canyon Boulevard & Promenade Boulevard/Calvert Street.*

In addition to this analysis, although not required by the LADOT *Transportation Impact Study Guidelines* and generally not analyzed in other City of Los Angeles EIRs, an evaluation of access conditions during the holiday time period (i.e., between Thanksgiving and New Year's Day) was also prepared for informational purposes only. LADOT requested this evaluation given the unique circumstances of this Project in which the proposed Entertainment and Sports Center is located adjacent to regional shopping centers at the Village at Westfield Topanga and Westfield Topanga and could potentially have a sold-out event during the holiday shopping season. As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, the intersections nearest the primary site access (i.e. on the boundaries of the Project Site) are projected to operate at LOS C or better, with one intersection (Intersection No. 24, Topanga Canyon Boulevard & Oxnard Street) projected to operate at LOS D during the 5:00 P.M.–6:00 P.M. period on a weekday and during the 1:00 P.M.–2:00 P.M. period on a Saturday. These represent acceptable operating conditions.

As described in Project Design Feature K-6, the Event Management Plan will include additional measures for the holidays to account for these conditions and ensure that acceptable access is maintained during holiday periods. For all events held with over 10,000 seats sold during the holiday time period, traffic control officers would be provided for intersections operating at LOS D (with Project traffic) within the Study area.

Although this analysis is not required by CEQA, the Traffic Study also included an analysis of projected operating conditions and queue lengths at the Project's four primary signalized driveways with implementation of the Project. Project driveways are projected to accommodate Project traffic and operate at an acceptable LOS without excessive congestion during all phases of the Project, under both no event and sold-out event conditions. During sold-out event conditions, measures to address queuing into the site would be included in the implementation of an EMP to facilitate on- and off-site circulation, as set forth in Project Design Feature K-6.

(e) Bicycle, Pedestrian, and Vehicular Safety

The Project's new pedestrian access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. In addition, the proposed minor driveways would be designed to limit potential impediments to visibility and incorporate pedestrian warning systems, if and to the extent necessary. The Project would also replace and enhance existing sidewalks and provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site.

As the Project would replace and enhance existing sidewalks and circulation system, the Project would not disrupt bicycle flow along Topanga Canyon Boulevard, Owensmouth Avenue, and Oxnard Street. In addition, to facilitate bicycle use, bicycle parking spaces and amenities would be provided within the Project Site in accordance with LAMC requirements.

Based on the above, the Project would not substantially increase hazards to bicyclists, pedestrians, or vehicles. As such, impacts related to bicycle, pedestrian, and vehicular safety would be less than significant.

(f) Parking

In accordance with SB 743, impacts associated with parking are not considered significant impacts. However, an analysis of parking is provided below for informational purposes.

Based on the parking requirements for residential, hotel, retail, and office uses set forth in the Warner Center Plan and the LAMC, the Project would be required to provide a total of 2,790 non-event parking spaces. As described in Section II, Project Description, of this Draft Supplemental EIR, the Project would provide a total of 5,610 parking spaces. The Entertainment and Sports Center would require 3,000 parking spaces under the LAMC (1 space per 5,000 seats). Therefore, the remaining 2,820 parking spaces provided on the Project Site (5,610 total spaces—2,790 non-ESC required spaces) would be utilized to fulfill the required parking spaces for the Entertainment and Sports Center. To make up the remainder of the required parking, a combination of on-site shared parking (shared with the office and retail uses only) and off-site parking located at adjacent office buildings is proposed. The required parking provided for the residential and hotel uses would not be shared, in accordance with the Warner Center Plan. However additional parking provided over the amount required for the residential and hotel uses could be shared with the Entertainment and Sports Center when needed.

As set forth under Project Design Feature K-6, the Project would include the development of an EMP. The EMP would address the on-site shared use and off-site parking required for the Entertainment and Sports Center, depending on the time of year, day/time of the event, and the number of event attendees. Relative to parking, the EMP would identify the number of on-site shared use parking spaces available for the Entertainment and Sports Center and identify the number of off-site parking spaces that would be required to meet demand, depending on the time of year and number of event attendees. The EMP would require that sufficient parking be provided through a combination of on-site shared parking and available off-site parking to meet event demand. The Applicant would be required to provide annual evidence to LADOT of agreements that

identify/secure the location and quantity of available off-site parking for review and approval.

Based on the above, and pursuant to SB 743 and ZI 2452, the Project's parking impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Therefore, impacts related to parking would be less than significant.

Bicycle parking requirements under the LAMC include short-term and long-term parking. The Project would meet the City's bicycle code requirements. Based on the City's current requirements, the Project would provide 361 short-term and 1,726 long-term bicycle parking spaces.³³ In addition, the Project would provide showers and lockers in compliance with LAMC Section 12.21.A.16, which requires shower and personal lockers for long-term bicycle parking spaces.

Based on the above, the Project would comply with the applicable bicycle parking requirements of the LAMC, and bicycle parking impacts would be less than significant.

(3) Caltrans Facilities Analysis

Analysis of Caltrans facilities was prepared in accordance with Caltrans TIS Guide. Caltrans does not identify specific incremental criteria by which to measure the significance of impacts to freeway mainline segments or intersections, and, therefore, it is not possible to identify whether a specific facility would be significantly impacted under Caltrans criteria.

(a) Existing Plus Project Conditions

(i) Intersections

The addition of the Full Project traffic results in 21 of the 26 arterial/ramp terminal intersections projected to operate at LOS D or better during all analyzed periods. Five intersections are projected to operate at LOS E or F during the noted peak period, which is their current operating condition.

³³ Required bicycle parking spaces per land use are as follows: 1,591 residential bicycle parking spaces (145 short-term spaces and 1,446 long-term spaces), 192 bicycle parking spaces for office uses (64 short-term spaces and 128 long-term spaces), 246 bicycle parking spaces for retail uses (123 short-term and long-term spaces each), and 58 bicycle parking spaces for the hotel use (29 short-term and long-term spaces each)

(ii) Freeway Mainline

The addition of the Full Project traffic is projected to result in the operation at LOS E or F of nine of 11 mainline segments along US-101 in at least one direction of travel during at least one of the analyzed peak periods. The remaining direction(s) of travel during the other peak periods operate at LOS D or better. Seven of the nine segments already operate at LOS E or F under Existing Conditions.

(iii) Off-Ramp Queuing

Three of the five off-ramps selected for analysis are projected to be able to adequately accommodate queuing with the addition of Project traffic. The US-101 Westbound off-ramp to North Topanga Canyon Boulevard is projected to continue exceeding the available queue storage capacity during the weekday afternoon and Saturday mid-day periods; the US-101 Westbound off-ramp at Canoga Avenue is also projected to exceed the available queue storage capacity during the weekday morning peak period.

*(b) Future with Project Year 2033 Conditions**(i) Intersections*

The addition of the Full Project traffic results in 21 of the 26 arterial/ramp terminal intersections projected to operate at LOS D or better during all analyzed periods. The five remaining intersections are projected to operate at LOS E or F during the noted peak period; four of the five intersections currently operate at LOS E or F under Existing Conditions.

(ii) Freeway Mainline

Eleven segments are projected to operate at LOS E or F in at least one direction of travel during at least one of the analyzed peak periods with the addition of Full Project traffic; seven of the 11 currently operate at LOS E or F under Existing Conditions.

(iii) Off-Ramp Queuing

Two of the five off-ramps selected for analysis are projected to be able to adequately accommodate queuing with the addition of Project traffic. The US-101 Westbound off-ramp to North Topanga Canyon Boulevard is projected to continue exceeding the available queue storage capacity during the weekday afternoon and Saturday mid-day periods. The US-101 Westbound off-ramp at Canoga Avenue is projected to exceed the available queue storage capacity during the weekday morning peak period. The US-101 Eastbound

off-ramp to De Soto Avenue is projected to exceed the available queue storage capacity during the weekday morning peak period.

(c) Future with Project Year 2035 Conditions

(i) Intersections

The addition of Project traffic results in 22 of the 26 arterial/ramp terminal intersections projected to operate at LOS D or better during all analyzed periods. Four remaining intersections are projected to operate at LOS E or F during the noted peak period; three of the four intersections currently operate at LOS E or F under Existing Conditions.

(ii) Freeway Mainline

Eleven segments are projected to operate at LOS E or F in at least one direction of travel during at least one of the analyzed peak periods; seven of the 11 currently operate at LOS E or F under Existing conditions.

(iii) Off-Ramp Queuing

Four of the five off-ramps selected for analysis are projected to adequately accommodate queuing with the addition of Project traffic. The US-101 Westbound off-ramp to Canoga Avenue is projected to exceed the available queue storage capacity during the weekday morning peak period.

(d) Proportionate Share

To identify the Project's contribution towards the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines. The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution towards the future implementation of a transportation improvement project to be selected by Caltrans. As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth at Project buildout is 2.51 percent without an ESC event; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2033. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps identified above to mitigate cumulative impacts to the state transportation network.

(e) *Consistency with Caltrans Interim Guidance/SB 743*

The Project is consistent with the Warner Center Plan and the policies of the Interim Guidance³⁴ to reduce VMT consistent with SB 743 as follows:

- The Project is “location-efficient”; i.e., it is an urban infill project in a transit rich area with safe and extensive access to multimodal transportation systems and key destinations.
- The Project Site is directly adjacent to the Warner Center Transit Hub, which is directly serviced by:
 - Metro Local Lines 150, 161, 164, ,169, 245
 - Metro Rapid Line 750
 - Metro Orange Line/future Warner Center circulator
 - Antelope Valley Transit Authority Line 787
 - Santa Clarita Transit Line 796
- The Project would provide bicycle parking consistent with the City’s requirements, as well as showers and lockers in compliance with LAMC Section 12.21.A.16, which requires shower and personal lockers for long-term bicycle parking spaces.
- The Project Site has been designed to encourage walkability. Consistent with the Warner Center Plan, the Project breaks up the current single, large block with a number of pedestrian paths traversing the Project Site, creating a more permeable pedestrian environment. People will be able to easily walk from the bus stops at the Warner Center Transit Hub and Topanga Canyon Boulevard into the Project Site. New landscaped, pedestrian paths will be created along all four street frontages, and more than two miles of landscaped pedestrian paths will be created going through the Project Site.
- The Project is located immediately north of office buildings that are major job centers, immediately south of regional shopping center destinations, and in close proximity to existing housing.

³⁴ *In anticipation of the shift in analysis methodology toward a VMT metric due to SB 743, Caltrans issued the Interim Guidance with the intention of updating the Caltrans TIS Guide. Although Interim Guidance identifies VMT goals consistent with SB 743, no specific VMT threshold criteria or methodology has been adopted.*

- The Project co-locates residential, commercial, and office on the Project Site, increasing housing and job opportunities in an infill site close to transit. The Project also locates an ESC on site, close to housing and jobs in the Downtown District of Warner Center, to provide an entertainment venue closer to San Fernando Valley residents than venues in Downtown Los Angeles or Hollywood.
- The Project is proposing to provide the minimum number of parking spaces permitted under the Warner Center Plan,³⁵ to further incentivize use of transit, bicycles, and walking. The Project does not propose to exceed the maximum number of parking spaces permitted (9,597 parking spaces).
- The Project conforms to the policies and requirements of the Warner Center Plan, which was developed to maintain consistency with the City of Los Angeles' Sustainable Communities Strategies.
- The Project is consistent with the growth patterns identified in the Warner Center Plan and the SCAG RTP/SCS.

b. Cumulative Impacts

(1) Construction

It is anticipated that many of the construction workers for the related projects are anticipated to arrive and depart the individual construction sites during off-peak hours, thereby minimizing construction-related trips during the A.M. and P.M. peak traffic periods. Nonetheless, the potential exists for the construction-related activities and/or haul routes of the Project and the related projects to overlap particularly with respect to related projects that access US-101 near the Project Site. Specifically, there is a potential for these related projects and the Project to use the same haul routes at the same time. In addition, as with the Project, other nearby related projects could require temporary lane closures during construction. Further, it is anticipated that the related projects would be required to prepare a Construction Management Plan to ensure that potential construction-related impacts are reduced. Nonetheless, to the extent that construction trips of related projects were to occur concurrently with the Project, cumulative construction traffic impacts would occur.

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. In addition, temporary displacement of bus stops adjacent to the Project is not anticipated but may

³⁵ The Warner Center Plan requires a minimum of one space per residential unit for a Project total of 1,432 residential spaces; two spaces per 1,000 square feet of retail for a Project total of 484 retail spaces; and one space per 1,000 square feet of office for a Project total of 629 office spaces.

occur and would be for as limited a time as possible. With implementation of Mitigation Measure K-1, Project construction would not result in changes to bus and/or transit service such that a substantial inconvenience to riders would occur. Furthermore, parking is not allowed adjacent to the Project Site, therefore, construction fences would not result in any temporary loss of on-street parking spaces. Therefore, the Project's impact to access and safety, transit, and on-street parking during construction would not be cumulatively considerable and would be less than significant.

(2) Operation

(a) Traffic Impacts

The Warner Center Plan Model used in the Traffic Study and above analysis incorporated forecasted traffic increases based on socioeconomic data inputs and is consistent with the SCAG Model. The Warner Center Model included forecasted future development in Warner Center, along with regional growth forecasts. The Future with Project analyses, in the above analysis, included this cumulative development, as well. Therefore, cumulative impacts on intersections, the regional transportation system, and neighborhood street segments, including from the Project, are accounted for in the analysis above. As discussed above, the impact associated with the addition of Full Project traffic to each analyzed intersection is anticipated to be less than significant with the full implementation of all Warner Center Plan improvements. Impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with implementation of all Warner Center Plan improvements. However, in the event that the Warner Center Plan improvements are not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements. With regard to neighborhood street segments, the Mobility Fee collected from the Project will finance the Warner Center Plan Mitigation Program, which includes neighborhood protection components. However, should significant impacts be identified and a neighborhood traffic management plan not be approved by the community, then significant Project-level neighborhood street segment impacts in the identified neighborhoods would remain. Such impacts would also be considered cumulatively significant.

With regard to public transit, although the Project (and other related projects) will cumulatively add transit ridership, Metro's Long Range Transportation Plan (LRTP) outlines new projects, programs and initiatives that would improve public transit systems. The LRTP includes rail line construction, transit and highway projects and additional services to accommodate cumulative demand in the region. These improvements will be funded through Measure M (Los Angeles County Traffic Improvement Plan), which was approved by voters in November 2016. With the LRTP projects and the establishment of a funding mechanism, cumulative impacts on public transit are anticipated to be less than significant.

(b) Access and Circulation

As analyzed above, the Project would result in less-than-significant impacts related to access and circulation. The Project occupies the entire block and is not directly adjacent to other sites. Therefore, the Project's cumulative impacts would not be cumulatively considerable and impacts to access and circulation would be less than significant.

(c) Bicycle, Pedestrian, and Vehicular Safety

It is anticipated that future related projects would be subject to City review to ensure that they are designed with adequate access/circulation, including standards for sight distance, sidewalks, crosswalks, and pedestrian movement controls. The Project is not anticipated to result in significant impacts related to these items. Thus, Project impacts with regard to bicycle, pedestrian, and vehicular safety would not be cumulatively considerable, and cumulative impacts would be less than significant.

(d) Parking

The Project would comply with the parking requirements set forth in the LAMC and the Warner Center Plan for the proposed uses. Similarly, related projects would have been, or would be subject to, City review to ensure that adequate parking be provided for each of the related projects. Furthermore, pursuant to SB 743 and ZI 2452, the Project's parking impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Therefore, Project impacts with regard to parking would not be cumulatively considerable, and cumulative impacts would be less than significant.

(e) Caltrans Facilities Analysis

Although the Project traffic is anticipated to add to cumulative impacts on Caltrans facilities, these cumulative impacts are typically beyond the feasibility of any individual project to implement improvements to Caltrans freeway facilities. Therefore, Appendix B of the Caltrans TIS Guide provides a methodology, as approved by Caltrans, to identify a project's proportionate share of the future traffic growth on the Caltrans freeway facilities and towards the eventual cost of improvements to Caltrans' system. Each of the related projects would be required to undergo an analysis to determine the proportionate share owed as the project's percentage of the total projected traffic growth on a freeway mainline segment over the next 17 years until year 2035, the horizon year of Caltrans' long-range planning projections.

c. Project Design Features

LADOT requires the Applicant to construct those Warner Center Plan mitigation measures located directly adjacent to the Project Site as well as dedicate right-of-way required by the Warner Center Plan. Since the Applicant is required to implement these Warner Center Plan measures with Project construction, these are assumed to be project design features for the purposes of this analysis. The Project Site-adjacent roadway improvements and right-of-way dedications which will be implemented by the Applicant, by Project phase, include:

Site Adjacent Warner Center Plan-identified transportation improvement measures:

- Intersection No. 17, Owensmouth Avenue & Erwin Street: Construction of a dedicated eastbound right-turn lane in combination with the dedication of right-of-way to facilitate the future construction of an additional eastbound left-turn lane. Implementation of this improvement would occur with construction of the Northeast Area (anticipated Phase 1).
- Intersection No. 20, Topanga Canyon Boulevard & Calvert Street/Promenade Boulevard: A new traffic signal will be installed at this intersection. Implementation of this improvement would occur with the anticipated Phase 2 (Northwest).

Right-of-way dedication required by Warner Center Plan:

- Intersection No. 24, Topanga Canyon Boulevard & Oxnard Street: Dedication of right-of-way required along Oxnard Street to facilitate the future construction of Warner Center Plan mitigation. Implementation of this improvement would occur with construction of the Southwest Area (anticipated Phase 3).
- Owensmouth Avenue frontage: A combination of required and voluntary right-of-way dedication between Erwin Street and Oxnard Street to facilitate the future construction of Warner Center Plan mitigation. Implementation of this improvement would occur with construction of the Northeast Area (anticipated Phase 1) north of Promenade Boulevard and Southeast Area (anticipated Phase 4) south of Promenade Boulevard.

The following roadway improvements and right-of-way dedications are additional project design features that will facilitate access to the Project site and are not required by the Warner Center Plan:

Project Design Feature K-1: Topanga Canyon Boulevard frontage: An auxiliary lane/fourth through lane is proposed along northbound Topanga Canyon Boulevard. This will result in an additional northbound lane, along the Project frontage, between Oxnard Street and Erwin Street. Implementation of this project design feature would occur with construction of the Northwest Area (anticipated Phase 2), north of Promenade Boulevard and Southwest Area (anticipated Phase 3), south of Promenade Boulevard.

Project Design Feature K-2: Intersection No. 20, Topanga Canyon Boulevard & Calvert Street/Promenade Boulevard: This intersection will be reconfigured to facilitate all vehicular movement for all approaches in conjunction with the required signalization. The east leg of this intersection effectively serves as a driveway into the Project Site. Implementation of this project design feature would occur with construction of the Northwest Area (anticipated Phase 2).

Project Design Feature K-3: Intersection No. 16, Warner Drive North & Erwin Street: This is a new intersection located approximately mid-block on Erwin Street. A voluntary dedication of right-of-way will be utilized to incorporate the construction of a dedicated eastbound right-turn lane into the Project Site; additionally, signalized control will be introduced along with a westbound left-turn lane. Implementation of this project design feature would occur with the Northwest Area (anticipated Phase 2).

Project Design Feature K-4: Intersection No. 21, Owensmouth Avenue & Promenade Boulevard: This existing intersection will be improved to facilitate access into/out of the Project Site and incorporates the required right-of-way dedication along Owensmouth Avenue. Implementation of this project design feature would occur with the Northeast Area (anticipated Phase 1).

Project Design Feature K-5: Intersection No. 25, Warner Drive South & Oxnard Street: This existing intersection will be improved to facilitate access into/out of the Project site. Implementation of this project design feature would occur with the Southeast Area (anticipated Phase 4).

Project Design Feature K-6: Operational Event Management Plan: An Event Management Plan (EMP) will be implemented as part of operation of the ESC. The EMP is intended to be an evolving document subject to modification over time in coordination and consultation with LADOT and Caltrans, in order to respond to changes in traffic patterns and mobility/parking technologies that may alter the travel to and attendance of events at the ESC.

On-site measures are proposed to include: providing access along all four street frontages of the Project Site; the addition of a northbound lane on the Topanga Canyon Boulevard across the site frontage

(resulting in a total of four northbound lanes); a dedicated entry speed ramp into the subterranean ESC parking garage on Topanga Canyon Boulevard between Oxnard Street and Promenade Boulevard; multiple above ground and subterranean parking facilities across the Project Site that will be managed by a single parking operator; subterranean parking that is designed to be connected and operated as a single facility; and centrally located pick-up/drop-off and bus zones. Also included as part of the on-site measures will be a guest communications system that will provide the location of the purchased parking space to visitors with the advance purchase of an event ticket; identification of preferred traffic routes to the assigned parking facility prior to the event, at the time of ticket purchase and on the parking ticket; traffic announcements and updates made in the ESC and to guest cell phones at the end of the event; and coordination of traffic information and ridesharing services.

Off-site measures are proposed to include: identification of specific routing to distribute event traffic away from already congested locations along with the use/installation of changeable message signs at select freeway and arterial locations to communicate to visitors the preferred routing to the Project Site; coordinated traffic control adjacent to the Project Site; coordination with the LADOT Traffic Action Team, which oversees and/or implements special event traffic operations in the City; coordination with the citywide Traffic Management Center to facilitate the real-time monitoring of event traffic conditions along with real-time adjustments to traffic control equipment, including allowing adjustments to signal timing and synchronization; deployment of Traffic Control Officers to selected locations for the purposes of directing traffic; and facilitation of the utilization and integration of transit services during ESC events, including by coordinating with Metro to optimize transit service and frequency to the ESC during events.

The EMP will also identify off-site parking needed to accommodate parking demand based on time of year, day/time of the event, and number of attendees. The Applicant will be required to provide DOT annually evidence of agreements that identify/secure the location and quantity of available off-site parking, prior to the issuance of a temporary or permanent certificate of occupancy for the ESC.

During the Holiday period between Thanksgiving and New Year's, for weekday or weekend events with 7,500 or more attendees, the EMP will be supplemented with additional measures to account for higher background traffic volumes. The Holiday EMP measures include: additional intersection operation adjustments and an expanded deployment of Traffic Control Officers.

These and other measures would be implemented in accordance with a tiered operational plan that is based on attendance. In particular, the off-site traffic management and traffic control officer components of the EMP would be scaled commensurate to the event attendance/projected traffic levels as set forth in the Traffic Study. As indicated therein, the EMP off-site measures are proposed to be applied at the following attendance levels:

<7,500 attendees: On-site measures; no off-site measures required;

7,500–10,000 attendees: On-site measures; off-site measures comprised of Traffic Management (changeable message signs), Coordinated Traffic Control (LADOT Traffic Management Center), and off-site parking; and,

>10,000 attendees: On-site measures; all off-site measures required, including those required above for 7,500 to 10,000 attendees, deployment of traffic control officers, and transit service coordination.

During holidays, the above measures would also be implemented for each of the attendance levels, plus for events with >10,000 attendees, additional traffic control officers would be located at all intersections operating at LOS D or worse (with Project traffic) within the Study Area.

Project Design Feature K-7: Transportation Demand Management (TDM) Program—The Project shall prepare and implement a TDM Program that includes strategies to promote non-automobile travel and reduce the use of single-occupant vehicle trips, which shall be reviewed and approved by LADOT. The TDM Program shall include design features, transportation services, education programs, and incentive programs intended to reduce the amount of single-occupancy vehicles during commute hours, although the elements of the TDM Program may vary by Project phase and not all of these elements shall be required for each phase.

d. Mitigation Measures

(1) Construction

The Warner Center Plan EIR contained a mitigation measure to reduce traffic impacts resulting from construction of the uses proposed within the Warner Center Plan area. The following mitigation measure is set forth in the Warner Center Plan.

Warner Center Plan Mitigation Measure TR-100: Require proposed WCRCCSP 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.

Based on Warner Center Plan Mitigation Measure TR-100, the following Project specific mitigation measure will be implemented for the Project to reduce construction impacts.

Mitigation Measure K-1: Construction Management Plan—Prior to the start of construction, the Applicant shall prepare a Construction Management Plan and submit it to the City for review and approval. The Construction Management Plan shall include such measures as, but not be limited to the following:

- 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 worker parking on adjacent residential streets;
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men flagmen)
- Prohibition of construction-related vehicle parking on surrounding public streets;
- Safety precautions for pedestrian 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 any anticipated stop relocations and durations;
- Provision of advanced notification of any temporary on-street parking removals and duration of removals;

(2) Operation

Pursuant to Warner Center Plan Section 7.6.1, LADOT shall require the Project to mitigate impacts by requiring 1) the physical roadway and streetscape mitigation measure

improvements as outlined in Appendix E [of the Warner Center Plan], 2) payment of the Mobility Fee in-lieu of any physical improvements, or 3) the combination of both the mitigation measures outlined in Appendix E and the payment of the Mobility Fee. The Warner Center Plan incorporates a Mitigation Program that includes a series of programmatic and physical improvements intended to mitigate the significant transportation impacts resulting from the buildout of the Warner Center Plan area. The Warner Center Plan Mitigation Program's list of mitigation measures is provided in Appendix M of this Draft Supplemental EIR.

Warner Center development projects, including the Project, are assessed a Mobility Fee based on the Warner Center Plan's requirements, which functions as an impact fee and is used to fund the mitigation program. The Warner Center Plan requires the City to collect impact fees from all development projects within the Warner Center Plan area and to implement the detailed improvements identified in the Warner Center Plan. Accordingly, the Project's required payments of those Mobility Fees used to fund the improvements identified in the Warner Center Plan constitute mitigation of the Project's impacts. Thus, the Project shall implement the following mitigation measure:

Mitigation Measure K-2: Warner Center Plan Mobility Fee. The Project shall pay Mobility Fees required by the Warner Center Plan by Project phase.

In addition, as indicated above, per LADOT's direction, the Warner Center Plan mitigation measures directly adjacent to the Project Site would be implemented by Project phase. Furthermore, the Project would implement Warner Center Plan Mitigation Measure TR-101 to reduce neighborhood street segment impacts resulting from operation of the Project, as follows:

Warner Center Plan Mitigation Measure TR-101: The City shall implement the WCRCCSP Neighborhood Protection Program. In accordance with the updated WCRCCSP, a portion of the new Mobility Fee will be dedicated to fund a Neighborhood Protection Program to promptly assess and mitigate unforeseeable neighborhood circulation impacts as they arise. The Neighborhood Protection Program will address and mitigate any unforeseeable traffic impacts resulting from a potential increase in overflow or cut-through traffic along study area neighborhood streets caused by the WCRCCSP development or its mitigation measures.

Based on Warner Center Plan Mitigation Measure TR-101, the following Project specific mitigation measure is implemented for this Project to reduce neighborhood street segment impacts:

Mitigation Measure K-3: Neighborhood Protection Program—The Warner Center Plan provides funding of the Neighborhood Protection Program and allows a mechanism for further study, if requested by residents of the identified neighborhoods, to identify potential intrusion impacts upon completion of a project. A neighborhood traffic management plan process for the Project would include the following steps:

1. Prior to completion of a Project phase that could result in neighborhood intrusion impacts (anticipated to be completion of the Southwest Area, following completion of the Northeast and Northwest Areas) (the “Potential Impact Phase”), the Applicant would collect 24-hour count data, subject to the approval of LADOT, on the key residential streets within the five identified neighborhoods. These counts would be completed and submitted to LADOT prior to the issuance of the temporary or final Certificate of Occupancy for the Potential Impact Phase.
2. If requested by LADOT, “after” counts would be conducted on event nights within one year of the opening of the Potential Impact Phase to quantify the level of intrusion impacts. These counts could be repeated in subsequent years to determine if the amount of intrusion has grown or diminished with stabilization of the Project’s operation.
3. If the traffic growth within the neighborhood exceeds the LADOT criteria for a significant impact, a neighborhood traffic management study for the affected neighborhood would be prepared.
4. A detailed neighborhood traffic management plan would be developed in cooperation with the neighborhood residents and then submitted to LADOT and to the residents for approval.
5. Should the plan fail to gain the required level of approval by the residents (per LADOT guidelines), then the improvement plan would not be implemented and such impacts would remain significant.

e. Level of Significance After Mitigation

(1) Construction

As provided above, Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1 would require the preparation and implementation of a Construction Management Plan that would require scheduling of construction-related deliveries, including haul trips, to occur outside the commuter peak hours to the extent feasible. The Construction Management Plan would also require temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public

roadways (e.g., flag men). However, even with implementation of the Construction Management Plan, Project-level and cumulative construction traffic impacts would remain temporarily significant and unavoidable.

The Construction Management Plan would also include safety precautions for pedestrians and bicyclists such as alternate routing and protection barriers, as appropriate, and would ensure that adequate and safe access remains available within and surrounding the Project Site. In addition, Project construction is not expected to create hazards for roadway travelers, bus riders, or drivers as appropriate 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 right-of-ways. Furthermore, implementation of the Construction Management Plan described above would further reduce impacts. Overall, Project-level and cumulative construction-related impacts associated with parking, access and transit would be less than significant.

(2) Operation

(a) Intersection Levels of Service

As discussed above, the impact associated with the addition of Full Project traffic to each analyzed intersection is anticipated to be less than significant with the full implementation of all Warner Center Plan improvements. Impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with implementation of all Warner Center Plan improvements. However, in the event that the Warner Center Plan improvements are not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

(b) Regional Transportation System

Project-level and cumulative impacts to CMP monitored intersections, freeway mainline monitoring station, and transit would be less than significant.

(c) Neighborhood Intrusion/Residential Street Segments

Should significant impacts be identified and a neighborhood traffic management plan not be approved by the community, then significant Project-level and cumulative neighborhood street segment impacts would remain significant.

(d) Access and Circulation

Project-level and cumulative access and circulation impacts would be less than significant prior to mitigation.

(e) Bicycle, Pedestrian, and Vehicular Safety

Project-level and cumulative impacts related to bicycle, pedestrian, and vehicular safety would be less than significant prior to mitigation.

(f) Parking

Project-level and cumulative impacts related to automobile and bicycle parking would be less than significant prior to mitigation.

(g) Caltrans Facilities Analysis

Caltrans does not identify specific incremental criteria by which to measure the significance of impacts to freeway mainline segments or intersections, and, therefore, it is not possible to identify whether a specific facility would be significantly impacted under Caltrans criteria. However the Applicant will work with Caltrans to determine a fair share percentage to apply towards a feasible improvement to mitigate the Project's contribution to cumulative impacts, if any.

L. Tribal Cultural Resources

a. Analysis of Project Impacts

The Sacred Land Files (SLF) and Native American Heritage Commission (NAHC) records searches conducted for the Project did not identify any recorded tribal cultural resources on the Project Site. However, NAHC records did indicate that the area is sensitive for cultural resources. In compliance with the requirements of AB 52, the City provided formal notification of the Project on November 14, 2016 to the tribes listed in Section IV.L, Tribal Cultural Resources, of this Draft Supplemental EIR.

As discussed in detail in the Tribal Cultural Resources (TCR) Report, Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians-Kizh Nation, was the only tribal representative that responded to project notification conducted by the City of Los Angeles Department of City Planning. The City spoke with Mr. Salas on January 24, 2017, following the request for consultation, during which the proposed Project was discussed. While Mr. Salas provided information over the course of ongoing consultation, no specific geographically-defined resources were identified within, or in the immediate vicinity of, the

Project area. In summary, the results of the records searches (i.e., the South Central Coastal Information Center (SCCIC) and NAHC) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site included in the TCR Report prepared by Dudek, demonstrate that there is no record or evidence of tribal cultural resources on or near the Project Site.

While no known tribal cultural resources have been identified, representatives of the Gabrieleño Band of Mission Indians-Kizh Nation have expressed concern regarding the potential to encounter unanticipated buried cultural deposits. In addition, NAHC records indicated that the area is sensitive for cultural resources. In consideration of this expressed concern and the results of the NAHC letter, a mitigation measure is proposed to ensure that potential impacts associated with tribal cultural resources would be less than significant. As required by Mitigation Measure L-1, below, the Applicant would retain an archaeologist monitor, and invite affiliated Native American tribes to observe, activities with the potential to encounter significant tribal cultural resources. These areas will be defined based on the recommendation of a qualified archaeologist. Mitigation for the unanticipated discovery of potential tribal cultural resources would include provisions for stopping work, additional Native American consultation, implementation, and reporting. In addition, Warner Center Plan Mitigation Measure CUL-3, provided in Section IV.C, Cultural Resources, of this Draft Supplemental EIR, would be implemented, which requires archaeological monitoring of grading of subsurface materials not previously disturbed to be undertaken. Furthermore, Warner Center Plan Mitigation Measure CUL-5, provided in Section IV.C, Cultural Resources, of this Draft Supplemental EIR, would be implemented that requires that if human remains are discovered during construction activities, construction work would be halted until appropriate site-specific treatment measures are implemented. Thus, along with implementation of Mitigation Measure L-1, Warner Center Plan Mitigation Measure CUL-3 and CUL-5, would also serve to reduce impacts to tribal cultural resources.

Based on the above, impacts relative to tribal cultural resources would be less than significant.

b. Cumulative Impacts

The Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that tribal cultural resources are uncovered, each related project would be required to comply with applicable regulatory requirements in the event of inadvertent discovery. In addition, all related projects and other future development within the Warner Center Plan area would be required to comply with the consultation requirements of AB 52 to determine and mitigate any potential impacts to tribal cultural resources. Furthermore, the Project would implement Mitigation

Measure L-1, below, whereby the Applicant will be required to have an archaeologist monitor, and invite affiliated Native American tribes to observe, activities with the potential to encounter significant Native American cultural resources. Additionally, the Project would implement mitigation measures CUL-3 and CUL-5, as provided in Section IV.C, Cultural Resources, that require monitoring, and halting of construction work should cultural resources be discovered. Therefore, cumulative impacts to tribal cultural resources would be less than significant and would not be cumulatively considerable.

c. Project Design Features

No specific project design features are proposed with regard to tribal cultural resources.

d. Mitigation Measures

As discussed above, in consideration of concerns from the Gabrieleño Band of Mission Indians-Kizh Nation and the results of the NAHC letter, a mitigation measure is proposed to ensure that impacts are reduced to a less-than-significant level. Specifically, Project-specific Mitigation Measure L-1 would be provided. In addition, Warner Center Plan Mitigation Measure CUL-3 and CUL-5, which are provided in Section IV.C, Cultural Resources, of this Draft Supplemental EIR, would be implemented as part of the Project and would also serve to reduce impacts to tribal cultural resources.

Mitigation Measure L-1: Prior to commencing any ground disturbance activities including excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site, the Applicant, or its successor, shall retain and pay for archeological monitors, determined by the City's Office of Historic Resources to be qualified to identify subsurface tribal cultural resources. The archeological monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological monitor shall be assigned to each location where the ground disturbance activities are occurring.

Prior to the commencement of any ground disturbance activities at the project site, the Applicant, or its successor, shall notify any California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project that ground disturbance activities are about to commence and invite the tribes to observe the ground disturbance activities, if the tribes wish to monitor.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by the qualified archeologist, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning, Office of Historic Resources.
2. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the Applicant, or its successor, reasonably concludes that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be

implemented as originally proposed by the archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by a qualified archaeologist and determined to be reasonable and appropriate.
7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.
8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and shall comply with the City's AB 52 Confidentiality Protocols.

e. Level of Significance After Mitigation

Project-level and cumulative impacts related to tribal cultural resources would be less than significant.

M.1. Utilities and Service Systems—Water Supply and Infrastructure

a. Analysis of Project Impacts

(1) Water Supply

(a) Construction

Construction activities for the Project would result in a temporary demand for water. Given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption of the Project at buildout. Based on a review of construction projects that are similar in size and duration to that of the Project, a conservative estimate of construction water use ranges from 1,000 to 2,000 gallons per day (gpd), which is substantially less than the approximately 532,835 gpd of estimated proposed water consumption at the Project Site for which the City would have available supplies, as discussed below. Furthermore, water consumption during construction would be less than the water demand of approximately 106,868 gpd for existing uses. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction. As such, construction-related impacts to water supply and infrastructure would be less than significant.

(b) Operation

The Project is subject to the requirements of Senate Bill 610 and is required to prepare a Water Supply Assessment (WSA). Based on the *Water Supply Assessment—Promenade 2035 Project* (Promenade 2035 WSA), it is estimated that the Project would generate an average daily water demand of approximately 627,011 gpd or approximately 702.39 acre-feet per year (AFY). The Project would implement Project Design Feature M.1-1, which includes implementation of additional water conservation measures beyond those required by the LAMC, as amended by Ordinance No. 184248. With the removal of the existing uses and implementation of Project Design Feature M.1-1, the Project would result in a net average daily water demand of approximately 532,835 gpd, or approximately 597 AFY. The WSA concluded that the projected water supplies for normal, single-dry, and multiple-dry years reported in LADWP's 2015 UWMP would be sufficient to meet the Project's estimated water demand of 597 AFY, in addition to the existing and planned future water demands within LADWP's service area, through the year 2040.

The Project would generate a net of approximately 3,714 new residents, 1,432 new households, and 3,048 new employees. The Project would be consistent with growth projections anticipated by the SCAG and the demographic projection for the City in both the

2012–2035 RTP/SCS and the 2016–2040 RTP/SCS. Specifically, based on SCAG’s most recent projections for the City of Los Angeles Subregion between 2016 and 2033, Project residents would represent approximately 0.8 percent of the projected population growth, Project households would represent approximately 0.65 percent of the projected household growth, and Project employees would represent approximately 0.56 percent of the projected employment growth.³⁶ Therefore, the Project would be within SCAG’s growth projections for the City of Los Angeles Subregion.

Based on the above, the estimated water demand for the Project would not exceed the available supplies projected by LADWP and the Project’s operation-related impacts on water supply would be less than significant.

(2) Water Infrastructure

(a) Construction

The existing off-site LADWP water infrastructure system would be adequate to provide for the water flow necessary to serve the Project during operation. Thus, no upgrades to the mainlines that serve the Project Site would be required. The Project would require a new water distribution system that would connect to the existing water mainlines adjacent to the Project Site. The design and installation of new service connections would be required to meet applicable City standards. Installation of the new water distribution lines would primarily involve on-site trenching to place the lines below the surface, and minor off-site trenching to connect to the existing public water mains or meter lateral locations. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. The limited off-site connection activities could also temporarily affect access in adjacent right-of-ways. However, as discussed Section IV.K. Traffic, Access, and Parking of this

³⁶ *Based on a linear interpolation of SCAG’s 2012–2040 data. The 2016 values for population, housing, and employment are calculated using SCAG’s 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2016.*

Population growth between 2016 (3,954,629 persons) and 2033 (4,418,425 persons) is approximately 469,796 persons. The Project’s 3,714 new residents would represent approximately 0.8 percent of this growth $((3,714 \div 469,796) \times 100 = 0.79)$.

Household growth between 2016 (1,377,614 households) and 2033 (1,599,100 households) is approximately 221,486 households. The Project’s 1,432 new households would represent approximately 0.65 percent of this growth $((1,432 \div 221,486) \times 100 = 0.65)$.

Employment growth between 2016 (1,763,929 employees) and 2033 (2,050,925 employees) is approximately 286,996 employees. The Project’s 3,048 net new employees would represent approximately 1.05 percent of this growth $((3,048 \div 289,996) \times 100 = 1.05)$.

Draft Supplemental EIR, a Construction Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, construction-related impacts to water infrastructure would be less than significant.

(b) Operation

Water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. The Project proposes to connect to the existing mains within all of the surrounding streets: Topanga Canyon Boulevard, Erwin Street, Oxnard Street and Owensmouth Avenue with laterals that would be adequately sized to simultaneously accommodate fire demand and domestic demand. In addition, the infrastructure would include backflows and would be metered separately per City requirements. While domestic water demand is typically the main contributor to operational water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore, are the primary means for analyzing infrastructure capacity.

Fire flow to the proposed buildings of the Project would be required to meet City fire flow requirements. Specifically, the Project would comply with Section 57.507.3.1 of the LAMC, which establishes fire flow standards by development type. Land uses proposed by the Project fall within the High Density Industrial and Commercial category, which has a required fire flow of 12,000 gpm available to any block with a residual pressure of 20 psi.³⁷ This translates to a required flow of 1,500 gpm for each of the eight hydrants that were tested within the immediate vicinity of the Project Site. An Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP to determine available fire hydrant flow from these eight existing public fire hydrants. Based on the completed IFFAR (see Exhibit 3 of Appendix P to this Draft Supplemental EIR), the eight existing public fire hydrants flowing simultaneously can deliver combined flows of more than 16,000 gpm at a minimum residual pressure of 20 psi. Therefore, based on the IFFAR, the Project has adequate fire flow available. The approved Service Advisory Requests (SARs) confirms that sufficient infrastructure capacity is available to provide fire water service to the Project, and upgrades to the mainlines that serve the Project Site would not be required.

With regard to domestic water capacity, the approved IFFAR and SARs confirm that sufficient off-site infrastructure capacity is also available to serve the private water

³⁷ While the corrected letter provided by LAFD on April 11, 2017, as provided in Appendix L of this Draft Supplemental EIR, specifies that the required fire flow for this Project is set at 6,000 gpm to 9,000 gpm from four to six fire hydrants flow simultaneously, to provide a conservative analysis for the Draft Supplemental EIR, the Project fire flow was analyzed against the more stringent requirement of 12,000 gpm for High Density Industrial and Commercial land uses.

demands of the Project. Accordingly, the Project would not require or result in the construction of new off-site water facilities or expansion of existing off-site facilities. Therefore, the Project's operational impacts on water infrastructure would be less than significant.

b. Cumulative Impacts

(1) Water Supply

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City and portions of the cities of West Hollywood, Culver City, South Pasadena, and the Owens Valley). LADWP, as a public water service provider, is required to prepare and periodically update its urban water management plan to plan and provide for water supplies to serve existing and projected demands. LADWP's 2015 UWMP accounts for existing development within the City, as well as projected growth through the year 2040. Additionally, under the provisions of Senate Bill 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. The WSA for such projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed.

There are 29 related projects located in the Project vicinity. The estimate of the related projects' water demand is conservative as it does not account for water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code. Combined with the Project's net increase in water demand of 532,835 gpd (approximately 597 AFY), this equates to a cumulative increase in average daily water use of approximately 2,730,923 gpd, or approximately 3,061 AFY.

As previously stated, based on water demand projections through 2040 in LADWP's 2015 UWMP, LADWP determined that it will be able to reliably provide water to its customers through the year 2040, as well as the intervening years (i.e., 2033, the project buildout year) based on demographic growth projections in SCAG's 2012–2035 RTP/SCS. The Promenade 2035 WSA also concluded that LADWP will be able to meet proposed water demand of the Project together with the existing and planned future water demands of the City. In addition, compliance of the Project and other future development projects with the numerous regulatory requirements that promote water conservation would also reduce water demand on a cumulative basis.

Overall, the LADWP's 2015 UWMP demonstrates that the City will meet all new water demands from projected population growth, through a combination of water conservation and water recycling. LADWP's 2015 UWMP specifically outlined the creation of sustainable sources of water for the City to reduce dependence on imported supplies. LADWP's 2015 UWMP also incorporates the goals of Executive Directive 5 and the City's Sustainability pLAN.

Based on the related projects list and projections provided in adopted plans, Project impacts to water supply would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Water Infrastructure

Development of the Project and future new development in the vicinity of the Project Site would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, other new development projects would be subject to LADWP review to assure that the existing public infrastructure would be adequate to meet the domestic and fire flow water demands of each project, and individual projects would be subject to LADWP and City requirements regarding infrastructure improvements needed to meet respective water demands, flow and pressure requirements, etc. All eight fire hydrants that serve the Project area exceed the 20 psi requirement, and the combined capacity exceeds 12,000 gpm fire flow requirement.³⁸ In addition, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for the Project. Furthermore, LADWP, the Los Angeles Department of Public Works, and the LAFD would conduct on-going evaluations of its infrastructure to ensure facilities are adequate. Therefore, Project impacts on water infrastructure would not be cumulatively considerable, and cumulative impacts on the water infrastructure system would be less than significant.

c. Project Design Features

The following project design feature is proposed with regard to water supply and infrastructure:

³⁸ While the corrected letter provided by LAFD on April 11, 2017, as provided in Appendix L of this Draft Supplemental EIR, specifies that the required fire flow for this Project is set at 6,000 gpm to 9,000 gpm from four to six fire hydrants flow simultaneously, to provide a conservative analysis for the Draft Supplemental EIR, the Project fire flow was analyzed against the more stringent requirement of 12,000 gpm for High Density Industrial and Commercial land uses.

Project Design Feature M.1-1: The Project design shall incorporate the following design features to support water conservation:

- High-efficiency toilets with flush volume of 1.04 gallons of water per flush.
- Kitchen faucets with flow rate of 1.25 gallons per minute.
- Showerheads with flow rate of 0.75 gallon per minute.
- Lavatory faucets with flow rate 0.35 gallon per minute for residential and hotel units.
- Pre-rinse spray valves (kitchen faucet) with flow rate of 1.28 gallons per minute.
- Residential clothes washers, front-loading (> 2.5 cu-ft)—Integrated Water Factor 3.0
- Residential dishwashers, 3.0 gallons/cycle.
- Cooling tower conductivity controllers or cooling tower pH conductivity controllers.
- Pool/spa solar water heating.
- Pool/spa recirculating filtration equipment.
- Pool splash troughs around the perimeter that drain back into the pool.
- Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired.
- Reuse pool backwash water for irrigation.
- Leak detection system for swimming pool and spa.
- Drip/subsurface irrigation (micro irrigation).
- Micro-spray.
- Proper hydro-zoning (group plants with similar water requirements together).
- Landscape contouring to minimize precipitation runoff.
- Drought-tolerant plants—100 percent of total ornamental landscaping.
- Rainwater harvesting systems.
- Wood chips and mulch (3 inches) around the base of trees and shrubs.
- No public water features.

d. Mitigation Measures

Project-level and cumulative impacts with regard to water supply and infrastructure would be less than significant with compliance with regulatory measures and implementation of project design features. Nonetheless, the relevant mitigation measures set forth in the Warner Center Plan EIR, would be implemented as part of the Project. No additional mitigation measures are required. Modifications to the mitigation measures set forth in the Warner Center Plan EIR are indicated by ~~strikethrough~~ for deletions and underline for additions.

Warner Center Plan Mitigation Measure U-1: Refer to Section IV.M.2, Utilities and Services—Wastewater for inclusion of this mitigation measure.

Warner Center Plan Mitigation Measure 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 Department of Water and Power, each Applicant/Contractor 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 LADWP will be required at the time that a water connection permit application is submitted.~~

[Provisions deleted above have been completed.]

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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 gallon 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 gallon 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); and,
- 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 percent
 - ~~Proper hydro-zoning, turf minimization, and use of native/drought tolerant plant materials~~
 - ~~Use of landscape contouring to minimize precipitation runoff~~

[Provisions deleted above are duplicates or are less stringent than Project Design Feature IV.M.1-1, above.]

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

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

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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.

Warner Center Plan Mitigation Measure 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).

e. Level of Significance After Mitigation

Consistent with the Warner Center Plan EIR, Project-level and cumulative impacts related to water supply and infrastructure would be less than significant with implementation of the above mitigation measures.

M.2. Utilities and Service Systems—Wastewater

a. Analysis of Project Impacts

(1) Construction

Construction activities for the Project would result in a temporary increase in wastewater generation as a result of construction workers on-site. However, such use would be temporary and nominal when compared with the Project Site wastewater generation under baseline conditions. In addition, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows from the Project Site to the City's wastewater system. In the event there is an increase in wastewater flow during construction, this increase would be limited and would be within the capacity of the wastewater facilities that currently serve the Project. Therefore, impacts to the wastewater system as a result of Project construction activities would be less than significant.

The Project would require construction of new on-site infrastructure to serve new buildings, and the potential upgrade and/or relocation of existing infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Therefore, as set forth in Mitigation Measure K-1 included in Section IV.K, Traffic, Access, and Parking, a Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. Therefore, Project impacts on wastewater associated with construction activities would be less than significant.

(2) Operation

The Project would generate a net increase in the average daily wastewater flow from the Project Site of approximately 420,082 gpd. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant. The Project's increase in average daily wastewater flow of 0.42 million gallons per day (mgd) would represent approximately 0.24 percent of the

current 175 mgd remaining available capacity of the Hyperion Treatment Plant. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the Hyperion Treatment Plant, and impacts would be less than significant.

It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2033. Based on this conservative assumption, the 2033 effective capacity of the Hyperion Service Area has been assumed to be 550 mgd. The Project's net increase in average daily wastewater generation of 0.42 mgd would represent approximately 0.08 percent of the Hyperion Service Area's estimated future capacity of 550 mgd and approximately 0.09 percent of the Hyperion Treatment Plant's design capacity of 450 mgd. In addition, when accounting for existing flows (338.2) plus the 0.42 mgd associated with the Project, 61.6 percent of the Hyperion Service Area's capacity of 550 mgd would be utilized. In addition, when accounting for current flows of approximately 275 mgd and the Project's net increase of 0.42 to the Hyperion Treatment Plant, 61.2 percent of the capacity of the Hyperion Treatment Plant would be utilized. Thus, the Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant. Impacts with respect to wastewater treatment capacity would be less than significant.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. A Sewer Capacity Availability Request, included in the Utility Report, provided in Appendix P, of this Draft Supplemental EIR, was obtained from LA Sanitation to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. The Bureau of Sanitation analyzed the Project demands in conjunction with existing conditions and forecasted growth, and approved the Project to discharge up to 526,950 gpd of waste water to the 15-inch VCP sewer line in Owensmouth Avenue and the 8-inch VCP sewer line in Erwin Street. Based on the current approximate flow levels and design capacities in the sewer system, and the Project's estimated wastewater flow, the City determined that the existing capacity of the above sewer mains would be adequate to accommodate the additional wastewater infrastructure demand created by the Project. Specifically, the Project's net increase of 420,082 gpd would be well below the approved discharge of up to 526,950 gpd for the sewer lines along Topanga Canyon Boulevard, Owensmouth Avenue and Erwin Street. The Project would also comply with LAMC Section 64.14 to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LA Sanitation and California Plumbing Code standards. Therefore, impacts related to wastewater generation and infrastructure capacity would be less than significant.

b. Cumulative Impacts

Development of the Project, in conjunction with the related projects, would result in an increase in the demand for sanitary sewer service in LA Sanitation's Hyperion Service Area. There are 29 related projects located in the Project vicinity. While not all of these Projects would be served by the sewers serving the Project Site, these related projects would be located within the Hyperion Service Area. Forecasted growth from the related projects would generate an average daily wastewater flow of approximately 2,180,691 gpd or approximately 2.18 mgd. Combined with the Project's net increase in wastewater generation of 420,082 gpd (0.42 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 2,600,773 gpd, or 2.6 mgd.

Based on LA Sanitation's average flow projections for the Hyperion Service Area, it is anticipated that the average flow in 2035 will be approximately 493 mgd.³⁹ In addition, the Hyperion Service Area's total treatment capacity would be approximately 550 mgd in 2030, conservatively assuming that the capacity will be the same as its existing capacity.

The Project wastewater flow of approximately 0.42 mgd combined with the specific related projects' flow of approximately 2.18 mgd, and the forecasted wastewater flow of 493 mgd for the Hyperion Service Area, would result in a total cumulative wastewater flow of approximately 495.6 mgd. Based on the Hyperion Service Area's current capacity of approximately 550 mgd, the Hyperion Service Area is expected to have adequate capacity to accommodate the cumulative wastewater flow to accommodate the Project and related projects. Therefore, Project impacts on the wastewater treatment systems would not be cumulatively considerable, and cumulative impacts would be less than significant.

As with the Project, new development projects occurring in the Project vicinity would be required to coordinate with LA Sanitation via a sewer capacity availability request to determine adequate sewer capacity. In addition, new development projects would also be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related

³⁹ *Conservatively based on the 2035 data set forth in the 2015 Urban Water Management Plan. City of Los Angeles, Department of Public Works, Bureau of Sanitation, 2015 Urban Water Management Plan, April 2016, Exhibit 4D.*

project and LA Sanitation to construct the necessary improvements. Furthermore, similar to the Project, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code, which would reduce wastewater generation. Therefore, Project impacts on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.

c. Project Design Features

The Project would include water conservation features, which would also result in a reduction in wastewater. Such conservation features are included in Project Design Feature M.1-1, included in Section IV.M.1, Utilities and Service System—Water Supply and Infrastructure.

d. Mitigation Measures

Project-level and cumulative impacts with regard to wastewater would be less than significant with compliance with regulatory measures and implementation of project design features. Nonetheless, the mitigation measure set forth in the Warner Center Plan EIR, and listed below, would be implemented as part of the Project. No additional mitigation measures are required.

Warner Center Plan Mitigation Measure U-1: The City shall require that the project applicant for each project within the WCRCCSP 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.

e. Level of Significance After Mitigation

Consistent with the Warner Center Plan EIR, Project-level and cumulative impacts related to wastewater generation, treatment, and infrastructure would be less than significant with implementation of the above mitigation measure.

M.3. Utilities and Service Systems—Solid Waste

a. Analysis of Project Impacts

(1) Construction

(a) Solid Waste

Construction of the Project would involve demolition and building construction activities. Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, the Project would not result in the need for an additional solid waste collection route.

Based on construction and debris rates established by the United States Environmental Protection Agency (USEPA), it is anticipated that construction of the Project would generate a total of approximately 77,832 tons of demolition debris and 11,473 tons of construction debris, for a combined total of 89,304 tons of construction-related waste generation. This total does not include soil export. Pursuant to the requirements of SB 1374 and City Ordinance No. 181519, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. The construction waste management plan to achieve a minimum 75-percent diversion from landfills is also set forth in the Warner Center Plan EIR as Warner Center Plan Mitigation Measure U-12. Furthermore, the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate would likely exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent. Applying this rate, the Project would dispose of approximately 22,326 tons of construction-related waste in the County's inert landfill throughout the construction period. This amount of construction and debris waste would represent approximately 0.037 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 59.83 million tons. Thus, the total amount of construction and demolition waste generated by the Project would represent a fraction of the remaining capacity at the unclassified landfill serving Los Angeles County. Since the County's unclassified landfill generally does not face capacity shortages, and the County's unclassified landfill would be able to accommodate Project-generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste. Therefore, construction impacts to solid waste facilities would be less than significant.

As described above, the Project's construction contractor would deliver all construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility in accordance with City requirements. Furthermore, in

accordance with regulatory requirements, the Project would implement waste reduction measures, which include reducing construction-related solid waste generation through the recycling of construction and demolition debris, and using recycled building materials for new construction. Thus, the Project would promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, Framework Element, RENEW LA Plan, and LA Green Plan. Therefore, construction of the Project would not conflict with any applicable state or City solid waste regulations.

(b) Hazardous Waste

Based on the age of several of the building structures on-site, asbestos or ACMs, LBP, and PCBs may be present. In the event that these hazardous materials are found in the buildings proposed for demolition, suspect materials would be removed in accordance with all applicable local, state, and federal regulations prior to demolition activities. In addition, although not expected, it is possible that contaminated soils may be uncovered during construction. Any such materials would be taken to a licensed hazardous waste disposal facility such as the Buttonwillow Landfill or the Kettleman Hills Facility for disposal. In addition, construction activities would require the use of fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners involved in the construction of the proposed structures. Those hazardous materials that are not consumed during the construction process would also require proper disposal at a licensed hazardous waste disposal facility, in accordance with all of the requirements of applicable regulatory agencies, which could include the LAFD, Los Angeles Regional Water Quality Control Board (LARWQCB), and/or the Department of Toxic Substances Control (DTSC). Compliance with such requirements, outlined in detail in Section IV.F, Hazards and Hazardous Materials, of this Draft Supplemental EIR, would reduce the potential for a Project impact associated with disposal of construction-related hazardous waste to a less-than-significant level.

(2) Operation

Operation of the Project would generate municipal solid waste typical of residential and commercial developments. Solid waste generated by the Project would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles.⁴⁰ The Project Site is located in an urban area with established solid waste

⁴⁰ *Private solid waste haulers hold individual contracts with landfill operators for the disposal of waste. Thus, it is unknown at this time which landfills would ultimately receive Project-generated waste. However, it is assumed that Project-generated waste would generally be disposed of at a Class III landfill open to the City of Los Angeles.*

collection routes. Furthermore, such waste would be disposed of in accordance with the upcoming Zero Waste LA Franchise System. As such, the Project would not result in the need for additional solid waste collection routes to adequately handle Project-generated waste.

When accounting for the removal of the existing uses, operation of the Project would result in a net increase of approximately 6,476 tons of solid waste generated on the Project Site annually, or approximately 18.18 tons per day. Assuming a diversion rate of 62 percent, the net increase in solid waste disposal associated with the Project would be approximately 2,461 tons per year. The Project would be subject to the City's upcoming Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025. The net increase in solid waste disposal associated with the Project would represent an approximate 0.13-percent increase in the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 1.91 million tons. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 78.71 million tons as of December 31, 2016.^{41,42} Thus, the Project's net increase of 2,461 tons of annual solid waste disposal would represent approximately 0.03 percent of the estimated remaining Class III landfill capacity available to the City of Los Angeles.

The County will continue to address landfill capacity through the preparation of Countywide Integrated Waste Management Plan annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. The 2019 Annual Report will include Countywide waste generation projections as well as policies and programs to implement waste reduction strategies through the Year 2033 (the buildout year). This information will be made available prior to Project buildout. It is not anticipated that between 2030 and 2033 (i.e., buildout year of the Project) the disposal needs of the County would be exceeded. Thus, based on the amount

⁴¹ Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). Total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site. The Chiquita Canyon Landfill Expansion permits the facility to operate until it reaches 60 million tons, or after 30 years, whichever comes first. However, since the current volume of the facility's wasteshed is unknown, the volume of waste that it would take to reach 60 million tons cannot be determined. As such, for a conservative analysis, the Chiquita Canyon Landfill Expansion is excluded from this calculation.

⁴² From the Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017. Estimated remaining Permitted Capacity based on landfill owner/operator responses in a written survey by Los Angeles County Department of Public Works as well as a review of the site specific permit criteria established by local land use agencies, Local Enforcement Agencies, California Regional Water Control Board, and the South Coast Air Quality Management District.

of solid waste to be generated by the Project, the waste reduction measures that would be implemented, and the existing capacity of Los Angeles County landfills, potential impacts associated with solid waste disposal would be less than significant.

The Project would comply with the City's requirements regarding construction and demolition debris disposal. In addition, the Project would provide recycling containers and associated storage areas on-site in accordance with City Ordinance No. 171687. As discussed in Section II, Project Description, of this Draft Supplemental EIR, the Project would comply with the City's Green Building Ordinance, as applicable. Furthermore, the Zero Waste LA Franchise System is expected to be in operation in 2017 before the Project is expected to be occupied. Thus, operational waste from the Project would likely be diverted at a rate greater than the current Citywide diversion rate of 76 percent and the 62-percent diversion rate set forth in the Warner Center Plan EIR. Therefore, the Project would not conflict with solid waste policies and objectives in the City of Los Angeles Source Reduction and Recycling Element or its updates, the City of Los Angeles Solid Waste Management Policy Plan, the Framework Element or the Curbside Recycling Program, or the County Integrated Waste Management Plan. As such, potential impacts with regard to consistency with solid waste regulations and policies would be less than significant.

Based on the analysis above, Project impacts with regard to solid waste would be less than significant.

b. Cumulative Impacts

(1) Construction

(a) Solid Waste

Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, the Project and each of the related projects would not result in the need for an additional solid waste collection route. Therefore, cumulative impacts on solid waste collection routes would be less than significant.

As analyzed above, the Project would dispose of approximately 22,326 tons of construction and demolition waste in the County's unclassified landfill after accounting for recycling pursuant to the requirements of SB 1374, and in compliance with the mitigation measures set forth in the Warner Center Plan EIR. Given the requirements of the Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181519), which requires all mixed construction and demolition waste generated within City limits be taken to a City certified construction and demolition waste processor, it is anticipated that future cumulative development would also implement similar measures to divert construction and demolition waste from landfills. Furthermore, the unclassified landfill that serves the City of

Los Angeles does not face capacity issues. Therefore, cumulative impacts on the unclassified landfill, Azusa Land Reclamation, would be less than significant.

The Project's and each related project's construction contractor would deliver all construction and demolition waste generated to a Certified Construction and Demolition Waste Processing Facility in accordance with City Ordinance No. 181519. Furthermore, in accordance with regulatory requirements, the Project, along with each related project, would implement waste reduction measures, including reducing construction-related solid waste generation through the recycling of construction and demolition debris and using recycled building materials for new construction. Thus, the Project and each of the related projects would promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, Framework Element, RENEW LA Plan, and LA Green Plan. Therefore, construction of the Project and each of the related projects would not conflict with any applicable state or City solid waste regulations.

(b) Hazardous Waste

Based on the age of buildings in the Project area and existing buildings at the sites of the related projects, asbestos or ACMs, LBP, PCBs, and other ground/soil contamination may be present. Suspect materials would be removed prior to demolition activities, in accordance with all applicable local, state, and federal regulations. In addition, any soils with concentrations of hazardous substances above acceptable levels would ultimately be disposed of at permitted hazardous materials disposal facilities such as the Buttonwillow Landfill, which has a permitted landfill capacity in excess of 10 million cubic yards, or the Kettleman Hills Facility, which has a projected remaining life of thirty plus years, for disposal.^{43,44}

Construction activities of the Project and the related projects would also require the use of fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners involved in the construction of the new or rehabilitated structures. Those hazardous materials that are not utilized during the construction process would require proper disposal at a licensed hazardous waste disposal facility, in accordance with all of the requirements of applicable regulatory agencies, which could include the LAFD, City of Los Angeles Department of Public Works, LARWQCB, and/or the DTSC. Because the use of hazardous materials is largely site-specific, compliance of each individual project with such requirements would reduce the potential for

⁴³ *Clean Harbors Environmental Services, Transportation & Disposal: Buttonwillow, California Facility Facts.*

⁴⁴ *Chemical Waste Management, Inc., Kettleman Hills, Brochure.*

cumulative impacts associated with disposal of construction-related hazardous waste to a less-than-significant level.

(2) Operation

Solid waste generated by cumulative development in the area would be recycled or collected by private waste haulers contracted by the Applicant and permitted by the City and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles.⁴⁵ The transport of solid waste generated by cumulative development to waste management/disposal facilities would continue to occur along existing solid waste routes of travel and would be a part of the City's Zero Waste LA Franchise System. As such, the Project and each of the related projects would not result in the need for additional solid waste collection routes to adequately handle new solid waste generated by cumulative development. Therefore, cumulative impacts on solid waste collection routes would be less than significant.

Operation of the Project, in conjunction with forecasted growth in the County through 2033 (inclusive of the related projects), would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. As previously stated, the Countywide demand for landfill capacity is continually evaluated by the County through preparation of the County Integrated Waste Management Plan Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, the 2016 Annual Report projects waste generation and available landfill capacity through at least 2031, the latest planning date available. At this time, projections for Countywide waste generation and landfill capacity for 2033, the Project's buildout year, are not available. As discussed in Section IV.M.3, Utilities and Service Systems—Solid Waste, of this Draft Supplemental EIR, the countywide cumulative need for Class III landfill disposal capacity, approximately 103.5 million tons in 2029, will exceed the 2016 remaining permitted Class III landfill capacity of 103.2 million tons. Nevertheless, as discussed above, the Project would generate an estimated net increase of approximately 2,461 tons of waste per year. Thus, the Project's contribution to the County's cumulative waste stream for the last forecasted year available would not be substantial. Furthermore, the Project would be within the anticipated development and the associated solid waste generation estimated in the Warner Center Plan EIR. Therefore, consistent with the determination in the Warner Center Plan EIR, the

⁴⁵ *Private solid waste haulers hold individual contracts with landfill operators for the disposal of waste. Thus, it is unknown at this time which landfills would ultimately receive Project-generated waste. However, it is assumed that Project-generated waste would generally be disposed of at a Class III landfill open to the City of Los Angeles.*

Project's contribution to the County's estimated cumulative waste stream would not be cumulatively considerable.

The 2016 Annual Report determined that future disposal needs can be adequately met through 2031. The County will continue to address landfill capacity through the preparation of Countywide Integrated Waste Management Plan annual reports to address potential future shortfalls in landfill capacity. In addition, jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with Countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2016 Annual Report. Based on this trend and because solid waste disposal is an essential public service that must be provided without interruption to protect public health and safety and the environment, concerted actions would continue to be taken by jurisdictions towards expanding and enhancing waste reduction and recycling programs, and implementing prudent solid waste management strategies in response to the strategies identified in the 2016 Annual Report. In addition, these actions would be consistent with AB 939, the County Integrated Waste Management Plan, and the City's Solid Waste Integrated Resources Plan, Framework Element, RENEW LA Plan, and LA Green Plan. Similar to the Project, the related projects would not conflict with AB 939, the County Integrated Waste Management Plan, and the City's Solid Waste Integrated Resources Plan, Framework Element, RENEW LA Plan, and LA Green Plan, and would promote source reduction and recycling, consistent with the relevant regulations and plans identified above. Thus, cumulative impacts with regard to solid waste would be less than significant.

c. Project Design Features

The following project design feature is proposed with regard to solid waste:

Project Design Feature M.3-1: The Project shall comply with the sustainability intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED[®]) program to meet the standards of LEED Silver or equivalent green building standards. In so doing, the Project shall:

- Implement a construction waste management plan to achieve a minimum 75-percent diversion from landfills;
- Use at least 10 percent recycled material, at least 10 percent regional materials use (sourced within 500 miles), and certified wood in new construction; and

- Use recycled content for concrete, fly ash within concrete, and structural steel with recycled content.

d. Mitigation Measures

Impacts from solid waste generation during construction and operation of the Project would be less than significant. Nonetheless, the mitigation measure set forth in the Warner Center Plan EIR, and listed below, would be implemented as part of the Project. No additional mitigation measures are required.

Warner Center Plan Mitigation Measure U-12: The City shall require that each project recycle and/or salvage at least 75 percent 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 percent or more, and all other development projects where the addition of floor area is 30 percent or more, are required to set aside a recycling area or room for on-site recycling activities.

e. Level of Significance After Mitigation

Construction and operation of the Project would result in less than significant impacts associated with solid waste. Nonetheless, mitigation measures from the Warner Center Plan EIR would continue to be implemented. Cumulative impacts would also be less than significant.

N. Appendix F—Energy Conservation

a. Analysis of Project Impacts

(1) Construction

(a) Electricity

A total of approximately 235 megawatt-hours (MWh) of electricity is anticipated to be consumed during Project construction. Electricity for construction would be supplied to the

Project Site by existing electrical services within the Project Site and would not affect other services. Furthermore, the electricity demand during construction would be slightly offset with the removal of the existing uses and surface parking areas on-site which currently generate a demand for electricity. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Therefore, the use of electricity during Project construction would not be wasteful, inefficient, or unnecessary.

Construction of the Project's electrical infrastructure would primarily occur within the Project Site; although some off-site construction activities to connect the Project's electrical infrastructure with primary electrical distribution lines could occur. All required infrastructure improvements will comply with applicable LADWP requirements, which would avoid potential impacts to existing energy systems and adjacent properties. As such, construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

The estimated construction electricity usage represents approximately 1.2 percent of the estimated annual operational demand for the Project which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Based on the above, construction-related impacts to electricity supply and infrastructure would be less than significant.

(b) Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Thus, there would be no demand generated by construction. However, the Project would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. Prior to ground disturbance, Project contractors would notify and coordinate with Southern California Gas (SoCalGas) to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction-related impacts to natural gas supply and infrastructure would be less than significant.

(c) Transportation Energy

Project construction would also consume energy in the form of petroleum-based fuels. On- and off-road vehicles would consume an estimated 403,616 gallons of gasoline

and approximately 2,832,502 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.01 percent of the 2016 annual on-road gasoline-related energy consumption and 0.42 percent of the 2016 annual diesel fuel-related energy consumption in Los Angeles County.

Solid waste reduction programs help to reduce the number of trips to haul solid waste, as well as reducing energy used to process solid waste. The City has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. Furthermore, as previously stated, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. In addition, the Project includes several design features, such as Project Design Feature M.3-1, which would require the Project to use at least 10 percent recycled material, at least 10 percent regional materials use, and certified wood in new construction; and use recycled content for concrete, fly ash within concrete, and structural steel with recycled content. In addition, Warner Center Plan Mitigation Measure U-12 requires that the Project recycle and/or salvage at least 75 percent 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. Thus, through compliance with the City's construction-related solid waste recycling programs, project design features, and mitigation measures, the Project would contribute to reduced energy consumption.

Therefore, based on the above, petroleum-based fuel use during Project construction would not be wasteful, inefficient, or unnecessary.

(2) Operation

(a) *Electricity*

With compliance with applicable 2016 CALGreen requirements, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 19,246 MWh/year.

In addition to complying with CalGreen requirements, the Project Applicant would also implement Project Design Feature D-1 in Section IV.D, Greenhouse Gas Emissions, of this Draft Supplemental EIR, which states that the design of the new buildings shall incorporate features of the LEED program to be capable of meeting the standards of LEED Silver or equivalent. Energy-related measures include exceeding the California's Building Energy Efficiency Standards by 25 percent for energy efficiency, the use of Energy Star-labeled products and appliances, and use of light-emitting diode (LED) lighting where appropriate, to reduce electricity use. Furthermore, Project Design Feature D-3 would

require the Project to install a minimum of 10 percent of total domestic hot water heaters as solar or non-fossil fuel burning units. Additionally, Project Design Features D-4 and D-5 would result in at least 40 percent of the total code-required parking spaces provided on the Project Site be capable of supporting electric vehicle supply equipment (EVSE) and at least 15 percent of the code-required parking spaces equipped with EV charging stations, respectively. It is anticipated that these measures would marginally increase usage of electricity, but that any additional electricity usage would be offset by energy savings of gasoline and diesel from the electric vehicles using the equipment. Further, under Project Design Feature D-6, the Project would provide a minimum of 500 kilowatts of photovoltaic panels on the Project Site. Project Design Features D-1 and D-3 through D-6 are provided in Section IV.D, Greenhouse Gas Emission, of this Draft Supplemental EIR. Moreover, Project Design Feature M.1-1 in Section IV.M.1, Utilities and Service Systems---Water Supply and Infrastructure, of this Draft Supplemental EIR, which states that the Project would implement water conservation features, including high-efficiency toilets with flush volume of 1.04 gallons per flush, kitchen faucets with flow rate of 1.25 gallons per minute, showerheads with flow rate of 0.75 gallon per minute, reuse pool backwash water for irrigation, drip/subsurface irrigation, and rainwater harvesting systems, among others.

Based on LADWP's 2016 Power Integrated Resource Plan, LADWP forecasts that its total energy sales in the 2033–2034 fiscal year (the Project's full buildout year) will be 28,804 gigawatt-hours (GWh) of electricity.^{46,47} As such, the Project-related net annual electricity consumption of 19,246 MWh/year would represent approximately 0.1 percent of LADWP's projected sales in 2033 (the Project's full buildout year). In addition, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.⁴⁸ Furthermore, the Project would implement any necessary connections and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project. Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Accordingly, operational impacts to electricity supply and infrastructure would be less than significant.

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CALGreen Code and California's Building Energy Efficiency Standards. Therefore, the Project would not conflict with

⁴⁶ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

⁴⁷ LADWP, 2016 Power Integrated Resource Plan, Appendix A, Table A-1.

⁴⁸ LADWP, 6100 Topanga Canyon Boulevard, will serve letter from Kevin R. Diem, dated November 7, 2016.

adopted energy conservation plans, or violate state or federal energy standards. Impacts associated with regulatory consistency would be less than significant.

(b) Natural Gas

Buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 34,433,600 cf/year. In addition, the Project Applicant would implement Project Design Feature D-1 in Section IV.D, Greenhouse Gas Emissions, of this Draft Supplemental EIR, which states that the design of the new buildings shall incorporate features of the LEED program to be capable of meeting the standards of LEED Silver or equivalent, including exceeding the California's Building Energy Efficiency Standards baseline standard requirements by 25 percent for energy efficiency. Specifically, natural gas would be reduced by implementing various energy efficiency improvements, consistent with LEED checklist requirements, such as installing high efficiency water heaters or tank less water heaters, installing enhanced insulation, and high-efficiency furnaces, among others. Furthermore, Project Design Feature D-2 would limit the installation of natural gas fireplaces to the villa and penthouse units and outdoor amenities. Additionally, Project Design Feature D-3 would require the Project to install a minimum of 10 percent of total domestic hot water heaters as solar or non-fossil fuel burning units. Project Design Features D-2 and D-3 are provided in Section IV.D, Greenhouse Gas Emission, of this Draft Supplemental EIR. Therefore, the Project would not cause wasteful, inefficient, and unnecessary consumption of natural gas during operation.

Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.38 billion cf/day in 2033 (the Project's full buildout year).⁴⁹ The Project would account for approximately 0.004 percent of the 2033 (the Project's full buildout year) forecasted consumption in SoCalGas' service area. In addition, SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.⁵⁰ The Project would implement any necessary connections and upgrades required by SoCalGas to ensure that SoCalGas would be able to adequately serve the Project. Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's net increase in demand for natural gas. Therefore, operational impacts to natural gas supply and infrastructure would be less than significant.

⁴⁹ *California Gas and Electric Utilities, 2016 California Gas Report p. 97. Interpolated between 2030 and 2035 estimates.*

⁵⁰ *Southern California Gas Company, Will Serve letter for: Job I.D.#44C-2015-100035, will serve letter from Phil Wright, dated November 4, 2016.*

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CALGreen Code and California's Building Energy Efficiency Standards. Therefore, the Project would not conflict with adopted energy conservation plans, or violate state or federal energy standards. Impacts associated with regulatory consistency would be less than significant.

(c) *Transportation Energy*

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As discussed in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, the Project Site is located in an area well-served by public transit. Specifically, the Project Site is directly adjacent to the Warner Center Transit Hub, which is directly serviced by five Metro local lines, one Metro Rapid line, one Antelope Valley Transit Authority line, one Santa Clarita Transit Line, and beginning June 2018, a new Warner Center circulator connecting to the Metro Orange Line, which will maintain comparable service frequency to the Metro Orange Line currently provided at the Project Site. In addition, in accordance with Project Design Feature K-7 presented in Section IV.K, Traffic, Access, and Parking, of this Draft Supplemental EIR, the Applicant shall develop and implement a TDM Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. Furthermore, the Project would meet the City's bicycle code requirements. Additionally, the Project Site has been designed to encourage walkability. Furthermore, the Project is proposing to provide the minimum number of parking spaces permitted under the Warner Center Plan, to further incentivize the use of transit, bicycles, and walking.

The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard Institute of Transportation Engineers (ITE) trip generation rates, which are consistent with the California Air Pollution Control Officers Association (CAPCOA) guidance document, *Quantifying Greenhouse Gas Mitigation Measures*.⁵¹ As such, the Project's siting would minimize transportation fuel consumption through the reduction of VMT.

With implementation of measures that would reduce VMT, the Project's estimated net petroleum-based fuel usage would be approximately 394,366 gallons of gasoline and 14,178 gallons of diesel per year, or a total of 408,544 gallons of petroleum-based fuels annually. This would be a 67-percent reduction in petroleum-based fuel usage in comparison to a standard project as estimated by CalEEMod. Based on the above, the

⁵¹ *California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010.*

Project would not cause wasteful, inefficient, and unnecessary consumption of petroleum-based fuel during operation. Impacts associated with operational transportation-related energy use would be less than significant.

The Project would be consistent with regional planning strategies that address energy conservation. As discussed in Section IV.H, Land Use, of this Draft Supplemental EIR, SCAG's 2016–2040 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. The 2016–2040 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT. The Project would be consistent with the energy efficiency policies emphasized in the 2016–2040 RTP/SCS. Most notably, the Project represents an infill development within the Warner Center Plan area of the City of Los Angeles that would concentrate new residential, retail/restaurant, office, hotel and entertainment uses within a HQTAs, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Therefore, impacts associated with regulatory consistency would be less than significant.

b. Cumulative Impacts

(1) Electricity

LADWP forecasts that its total energy sales in the 2033–2034 fiscal year (the Project's full buildout year) will be 28,804 GWh of electricity.^{52,53} As such, the Project-related annual electricity consumption of 19,246 MWh/year would represent approximately 0.1 percent of LADWP's projected sales in 2033 (the Project's full build out year). In addition, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.⁵⁴ Although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with growth expectations for LADWP's service area. Accordingly, the Project's contribution to cumulative impacts related to electricity consumption would not be cumulatively considerable and, thus, would be less than significant. Furthermore, during

⁵² LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

⁵³ LADWP, 2016 Power Integrated Resource Plan, Appendix A, Table A-1.

⁵⁴ LADWP, 6100 Topanga Canyon Boulevard, will serve letter from Kevin R. Diem, dated November 7, 2016.

construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary.

LADWP has indicated that the Power Integrated Resource Plan incorporates the estimated electricity requirement for the Project. The Power Integrated Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

(2) Natural Gas

Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.38 billion cf/day in 2033 (the Project's full buildout year).⁵⁵ The Project would account for approximately 0.004 percent of the 2033 (the Project's full buildout year) forecasted consumption in SoCalGas' planning area. In addition, SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.⁵⁶ SoCalGas' forecasts take into account projected population growth and development based on local and regional plans. Furthermore, future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary. Accordingly, the Project's contribution to cumulative impacts related to natural gas consumption would not be cumulatively considerable and, thus, would be less than significant.

⁵⁵ *California Gas and Electric Utilities, 2016 California Gas Report p. 97. Interpolated between 2030 and 2035 estimates.*

⁵⁶ *Southern California Gas Company, Will Serve letter for: Job I.D.#44C-2015-100035, will serve letter from Phil Wright, dated November 4, 2016.*

Natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvements by SoCalGas occur as needed. It is expected that SoCalGas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. As such, the Project's contribution to cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and, thus, would result in a less-than-significant cumulative impact.

(3) Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. At buildout, the Project's estimated petroleum-based fuel usage would be approximately 394,366 gallons of gasoline and 14,178 gallons of diesel per year, or a total of 408,544 gallons of petroleum-based fuels annually. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.01 percent of the 2033 annual on-road gasoline-related energy consumption and 0.002 percent of the diesel-related energy consumption in Los Angeles County. Petroleum currently accounts for 90 percent of California's transportation energy sources; however, over the last decade the state has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled which would reduce reliance on petroleum fuels. According to the CEC, gasoline consumption has declined by 6 percent since 2008, and the CEC predicts that the demand for gasoline will continue to decline over the next 10 years and that there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions. Furthermore, the Project would be consistent with the policies emphasized by the 2016–2040 RTP/SCS. Most notably, the Project represents an infill development within the Warner Center Plan area of the City of Los Angeles that would concentrate new residential, retail/restaurant, office, hotel and entertainment uses within a HQTAs, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project Site is directly adjacent to the Warner Center Transit Hub, which is serviced by five Metro local lines, one Metro Rapid line, one Antelope Valley Transit Authority line, one Santa Clarita Transit Line, and beginning June 2018, a new Warner Center circulator connecting to the Metro Orange Line, which will maintain comparable service frequency to the Metro Orange Line currently provided at the Project Site. The Project also would introduce new housing and job opportunities within a HQTAs, which is consistent with numerous policies in the

2016–2040 RTP/SCS related to locating new jobs near transit. The Project results in a VMT reduction of approximately 67 percent in comparison to a standard project as estimated by CalEEMod, which would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS. By its very nature, the 2016–2040 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. Since the Project is consistent with the 2016–2040 RTP/SCS, its contribution to cumulative transportation energy use is not cumulatively considerable, and therefore, would result in a less-than-significant cumulative impact.

c. Project Design Features

The Project would include Project Design Features designed to improve energy efficiency as set forth in Section IV.D, Greenhouse Gas Emissions, Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, and Section IV.M.3, Utilities and Service Systems—Solid Waste, of this Draft Supplemental EIR.

d. Mitigation Measures

Project-level impacts to energy during construction and operation of the Project would be less than significant. Therefore, no mitigation measures are required.

e. Level of Significance After Mitigation

Project-level and cumulative impacts related to energy would be less than significant without project-level mitigation.