CATEGORICAL EXEMPTION FOR THE VENTURA ASSISTED LIVING PROJECT

PROJECT DESCRIPTION

The 0.9-acre Project Site is located at 16151-16201 West Ventura Boulevard in the Encino-Tarzana Community Plan area of the City of Los Angeles (City). Specifically, the Project Site comprises two Assessor Parcel Numbers (APNs) (2260-011-001 and 2260-011-002). The Project Site bound by Ventura Boulevard to the south; a parking building to the west; 13-story office building to the east; and single-family residential land uses to the north. The greater Project Site area is developed with mixed commercial and residential uses along the Ventura Boulevard corridor, with single-family residential neighborhoods extending north and south of the corridor. The Project Site is currently developed with two commercial buildings (approximately 23,133 square feet) and a surface parking lot. The Ventura Freeway (State Route 101) is located approximately 0.5 miles north of the Project Site, and the 405 Freeway (Interstate 405) is located approximately 1.0 mile to the east of the site. The Project Site is zoned C4-1L (Commercial Zone, Height District 1L), with a General Plan land use designation of Regional Center Commercial. The Project Site is also located in the Ventura/Cahuenga Corridor Specific Plan (Specific Plan) area and further designated Regional Commercial.

The Project includes demolition and removal of the existing commercial structures and surface parking lot from the Project Site and development of the site with an approximately 115,886-square-foot eldercare development consisting of 107 assisted living dwelling units and 16 memory care guest rooms (with a total of 17 beds), for a total of 123 residential units. The proposed building would reach a maximum height of 77 feet (at its highest point for the elevator overrun) and a maximum height of 71 feet to the top of the parapet, built to six stories, with the building stepped back from Ventura Boulevard as prescribed by the Specific Plan.

The Project would comply with vehicle parking requirements outlined in the Los Angeles Municipal Code (LAMC) Section 12.21.A.4(u) and LAMC Section 12.21A.4 (Bicycle Parking Reduction), resulting in an overall parking requirement of 57 parking spaces – 52 spaces for the assisted living dwelling units at a ratio of 0.5 spaces per unit, and 4 spaces for the memory care guest rooms at a ratio of 0.2 spaces per bed. The Project provides 77 vehicle parking spaces and 35 bicycle long-term and short-term spaces. Parking would be included within one subterranean level.

Vehicular access to the Project would be provided via one driveway Ventura Boulevard, similar to the existing ingress and egress at the site. The driveway would provide access to the resident pick-up/drop-off loading area and access to the entrance of the parking garage and would serve as the fire lane along the western edge of the Project Site.

The Project includes approximately 13,569 square feet of useable open space, more than the required 11,225 square feet. The open spaces areas include a 1,325-square-foot outdoor dining area on level 1; a 3,814-square-foot courtyard on level 2; a 1,145-square-foot roof deck space on level 6; 2,806 square feet of indoor common amenity space; and 4,479 square feet of private balconies.

The requested discretionary approvals to allow for the Project include the following:

1. **ELDERCARE FACILITY UNIFIED DEVELOPMENT** permit pursuant to the provisions of LAMC Section 14.3.1;

2. **PROJECT PERMIT COMPLIANCE** approval, pursuant to LAMC Section 11.5.7(C) to allow the Project within the geographic boundaries of the Ventura/Cahuenga Boulevard Corridor Specific Plan; and

3. **SITE PLAN REVIEW** findings, pursuant to LAMC Section 16.05, for a development project consisting of 50 or more dwelling units.

CATEGORICAL EXEMPTION

Title 14 of the California Code of Regulations, Chapter 3 (Guidelines for Implementation of the California Environmental Quality Act [CEQA]), Article 19 (Categorical Exemptions), Section 15300 (Categorical Exemptions) includes a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA.

For the reasons discussed in detail later in this document, the Project is categorically exempt from the requirement for the preparation of environmental documents under Class 32 in Section 15332, Article 19, Chapter 3, Title 14 of the California Code of Regulations. Class 32 is intended to promote infill development within urbanized areas. The class consists of environmentally benign in-fill projects that are consistent with local general plan and zoning requirements. Class 32 is not intended to be applied to projects that would result in any significant traffic, noise, air quality, or water quality effects. Application of this exemption, as all categorical exemptions, is limited by certain exceptions identified in section 15300.2.

> ***15332. In-Fill Development Projects.***
>
> *Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.*
>
> *(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*
>
> *(b) The proposed development occurs within city limits on a Project Site of no more than five acres substantially surrounded by urban uses.*
>
> *(c) The Project Site has no value as habitat for endangered, rare or threatened species.*
>
> *(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*

(e) The site can be adequately served by all required utilities and public services.

Note: *Authority cited: Section 21083, Public Resources Code. Reference: Section 21084, Public Resources Code.*

15300.2. Exceptions

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

Discussion of 15332(a)

The Project would be consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

1. The Project substantially complies with the applicable regulations, findings, standards, and provisions of the Specific Plan.

As explained in greater detail below, the proposed Project is in compliance with the applicable regulations, findings, standards and provisions of the, with the exception of the associated request for Eldercare Facility Unified Development permit. The Project Site is designated as Regional Commercial under the Specific Plan.

Section 5: Prohibitions, Violations, Enforcement, Use Limitations and Restrictions, and Exemptions

Section 5.C.3, Other Limitations within the Ventura/Cahuenga Boulevard Corridor Specific Plan Area

This provision restricts the use of permanent cargo containers and allows for the use of temporary permits for cargo containers for incidental storage to an existing commercial use. The Project would not employ the use of cargo containers, and thus, complies with this provision.

Section 6: Building Limitations

Section 6.B.3. Floor Area Ratio Limitations

This provision limits projects within the Regional Commercial Plan Designations to a maximum floor area ratio (FAR) of 1.25:1.

The Project includes the development of an approximately 115,886-square-foot eldercare facility on an approximately 39,421-square-foot lot, with a buildable area equal to the lot area per LAMC Section 12.03. The Project would result in a FAR of 2.94:1. The Project Applicant is requesting an Eldercare Facility Unified Development with a request to deviate from this provision, proposing a FAR of 2.94:1. The existing FAR limitation presents a hardship as it prevents the Project from achieving the high level of comprehensive services and the density required to support the scale of the amenities and services provided by the proposed use, rending the Project infeasible.

As recently as July 2018, the Project Site was entitled by the City Planning Commission, on appeal, for a 114-dwelling-unit residential development that includes set aside units for Very Low-Income Households. That approved project is consistent with the zoning regulations, which allow, through Density Bonus provisions, a FAR of up to 3:1 and a height of up to 86 feet. However, the Project Site recently changed ownership, and the new and current Property Owner/Applicant is seeking revised entitlements to allow for an Eldercare Facility Unified Development, in keeping with the building envelope created by the project approved in July 2018.

Section 7: Land Use Regulations

Section 7.A.2. Regional Commercial and Community Commercial Plan Designation Areas

a. *Front Yards and Setbacks. No project shall be built within 18 inches of the front lot line and this area shall be landscaped to the satisfaction of the Director of Planning. A maximum 10-*

foot Front Yard shall be permitted. No parking area or driveway shall be placed directly in front of the building except where a driveway is located to provide direct access through the building to a parking area located in the building or to the rear of the building.

Alternatives:

1. *Notwithstanding Paragraph (a) above, except for areas required for vehicular access to parking, a Front Yard of between 10 feet and 40 feet in depth for a maximum of 50 percent of the length of the front lot line or a maximum width of 50 feet, whichever is less, may be provided. If this Alternative is utilized, then the Project shall not be subject to the requirement is Subsection 7 E 1 (f) and (g).*

This provision applies to the Regional Commercial and Community Commercial Plan Designation Areas, requiring a front setback of 18 inches and allowing for a maximum front yard of 10 feet. The Project provides for an 18-inch setback from the front property line, landscaped to the satisfaction of the Director of Planning, as shown on the plans submitted with the Project application. In addition, the Project provides a front yard of 10 feet, consistent with the Alternative Front Yard requirement per the Specific Plan.

b. *Side Yards: No side yard shall be permitted at the Ground Floor except that an accessway, which may include a maximum 20-foot wide driveway, a maximum 4 foot wide walkway and landscape buffers of 18 inches to 5 feet on either side of the accessway may be provided for vehicular access to parking and pedestrian access to the building, or as specified in Subsection D [Parking] below, or where the Project contains residential uses, in which case, LAMC Sections 12.07, 12.07.01, 12.07.1, 12.08, 12.08.01, 12.08.3, 12.08.5, 12.09, 12.09.5, 12.10, 12.11 and 12.12 shall apply.*

The Project is a residential care facility for the elderly and is considered a "Residential Building" per LAMC Section 12.03 (Definitions). Residential dwelling units and memory care guest rooms are provided beginning on the ground floor up to the 6th floor. The underlying zoning for the Project Site is C4-1L and is subject to the land use regulations of the R4 zone for use and area. Pursuant to LAMC Section 12.11 (R4), the proposed 6-story building requires a side yard setback on each side of 9 feet (5 feet, plus 1 foot for each story above the second story, not to exceed 16 feet). The Project proposes a side yard of 9 feet on the east and west sides of the building at the first habitable room level (level 1). Thus, the Project complies with this provision.

c.2 *Rear Yards: If the rear lot line of a lot is adjacent to a residential use, then the lot shall have a minimum 20-foot rear yard, unless more is required by LAMC Section 12.21.1 A.10*

The Project shares a common lot line with a lot classified in the R1 zone, requiring a minimum 20-foot rear yard. The Project provides a landscaped rear yard of 20 feet in depth in compliance with this requirement.

Section 7.B.1. Lot Coverage

This provision applies to the Regional Commercial and Community Commercial Plan Designation Areas and restricts buildings and structures to a lot coverage not to exceed 75 percent of the lot area. The Project has a lot coverage of approximately 67 percent and complies with this provision.

Section 7.D. Landscaping Requirements

3. Yards, Setbacks, and Building Frontages

a. At least 60 percent of all Front Yards or front setbacks in excess of 18 inches shall be landscaped and the remainder shall be finished to City standards for sidewalks, or finished with other paving materials, including concrete pavers, brick masonry pavers.

***Alternative:** Notwithstanding Paragraph (a) above, where sidewalk dining or a water feature is provided, at least 30 percent of all Front Yards or front setbacks in excess of 18 inches, shall be landscaped and the remainder shall be finished to City standards for sidewalks, or finished with other paving materials, including concrete avers, brick masonry pavers or tile or covered gravel.*

This provision applies to the portions of the Project's front yard setback that are in excess of 18 inches. The Project proposes a front yard of approximately 10 feet, including the provision of a water feature within the front yard area. With the provision of a water feature, the 10-foot front yard would have approximately 32.5 percent of landscape coverage. The landscape within the front yard includes new trees and planters along Ventura Boulevard, in addition to a paved seating area and green screen with vine planting.

b. The Applicant shall install an automatic irrigation system to maintain all required landscaping.

The Project would install an automatic irrigation system to maintain all required landscaping on the Project Site.

Section 7.E. Height Limit – Encino

1.c.1(g). From the intersection of the San Diego Freeway overpass and Ventura Boulevard to the intersection of Balboa Boulevard and Ventura Boulevard: On both sides of Ventura Boulevard – 45 feet. In addition, in the Regional Commercial Plan Designation area, building abutting a major or secondary highway may exceed 45 feet in height, if, for each 10-foot increment above 45 feet, at least a ten-foot setback from the roof perimeter is provided.

The Project Site is located on Ventura Boulevard between the San Diego Freeway overpass at Ventura Boulevard and the intersection of Balboa Boulevard and is subject to the prescribed maximum height of 45 feet. In addition, the Project Site's underlying zone and height district of C4-1L allows for a maximum height of 75 feet and six stories. The Specific Plan allows for buildings abutting a Boulevard II (formerly Major Highway) to exceed 45 feet in height, if for each 10-foot increment above, at least a 10-foot stepback from the roof perimeter is provided, or alternatively, pursuant to Section 7.2.A.a of the Specific Plan, if a front yard of between 10 and 40 feet from the property line is provided. The Project incorporates the prescribed incremental stepbacks from the roof perimeter consistent with Section 7.E.1(g) of the Specific Plan, allowing for a building height not to exceed 75 feet.

Section 7.F. Parking

The parking provisions for institutions as set forth in LAMC Section 12.21.A.4(d) require one automobile parking space for each assisted living care dwelling unit and 0.2 automobile parking spaces for each memory care guest bed. The Project includes 107 dwelling units and 17 memory care guest beds. As it meets the requirements for occupant demographics, access to indoor recreation and outdoor open space, and covenants under LAMC Section 12.21.A4(u), the Project is eligible for a 50 percent parking ratio exemption for senior living homes and is required to provide a minimum of 57 parking spaces. The Project complies with this provision as the Project would provide 77 parking spaces, 2 of which would be reserved for handicap parking, and 4 of which would serve electric vehicles.

Section 8: Sign Regulations

The Project will comply with the standards and regulations contained within this section, as well as with the provisions of LAMC Chapter II, Article 8, Section 28.00; Chapter VI, Article 7, Section 67.00; and Chapter IX, Article 1, Division 62, in regard to Wall Signs, Monument Signs and Projecting.

Section 9.A.1. Project Permit Compliance Process

In compliance with this section, the Project Applicant is for a Project Permit Compliance Review. In compliance with this provision, the Project Application includes a submittal of plot plans, landscape and irrigation drawings, and building elevations, photographic renderings, and an Environmental Assessment Form.

Section 10: Transportation Mitigation Standards and Procedures

With regards to the Specific Plan's Transportation Mitigation Standards and Procedures, the Applicant has submitted an Application for Consideration to the Los Angeles Department of Transportation (LADOT), and pursuant to direction from LADOT, has produced a Traffic Technical Memorandum for the Project prepared by Overland Traffic Consultants (refer to Appendix A).

Section 14: Public Right-of-Way Improvements

Encino Streetscape Plan

This section refers to design guidelines specifically created for the Encino area of the Specific Plan, known as the Encino Streetscape Plan (Streetscape Plan). The Project Site is located within the Streetscape District known as "Subarea C" of the Streetscape Plan and has its own distinct street tree, planting, and design recommendations.

Additionally, the Streetscape Guidelines provide "On-Site Improvement Standards/Design Guidelines," of which the following are applicable to the proposed Project:

Section 6.1 On Site Signage

The Project will comply with the standards and regulations contained within this section, as well as with the provisions of LAMC Chapter II, Article 8, Section 28.00; Chapter VI, Article 7, Section 67.00; and Chapter IX, Article 1, Division 62, in regard to Wall Signs, Monument Signs and Projecting.

Section 6.2 Paint/Colors/Surface Treatments of Commercial Buildings and Facades

Façade details for the Project include a maximum of 5 different colors – black, grey, white, clear cedar, and vinyl – in compliance with this section. By nature, these colors blend with the overall building design and are not used as "attention getters."

Section 6.3 Street Level Design

In compliance with this section, the Project will provide 3 "Pink Trumpet" Trees per the Streetscape Plan. In addition, the front yard will have an outdoor seating area, water feature, green screens with vine planting, and built-in planters, as well as a front yard of approximately 10 feet along the length of the frontage, thereby providing dimensional relief along the building facing the sidewalk and Ventura Boulevard.

Section 6.5 Lighting

In harmony with this guideline, the Project will provide on-site lighting that is directed on site and will not be directed towards adjacent properties, including residential uses.

Section 6.8.1 On Site Circulation and Access

In harmony with this guideline, the grade-level parking for the Project is located within the building and screened from view.

2. That the Project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review, which would mitigate the negative environmental effects of the project, to the extent physically feasible.

As outlined in this Class 32 Categorical Exemption, the Project would not result in any significant environmental impacts and as such, no mitigation measures are required

Discussion of 15332(b)

The proposed development occurs within city limits on a Project Site of no more than five acres substantially surrounded by urban uses.

As discussed under Project Description, the Project Site is located within City limits, is 0.9 acres in size, and is completely surrounded by urban uses, including Ventura Boulevard to the south; an office building to the west; a commercial building to the east; and single-family residential land uses to the north. The greater Project Site area is developed with mixed commercial and residential uses along the Ventura Boulevard corridor, with single-family residential neighborhoods extending north and south of the corridor. The Project Site is currently developed with two commercial buildings (approximately 23,133 square feet) and a surface parking lot. The Ventura Freeway (State Route 101) is located approximately 0.5 miles north of the Project Site, and the 405 Freeway (Interstate 405) is located approximately 1.0 mile to the east of the site.

Discussion of 15332(c)

The Project Site has no value as habitat for endangered, rare, or threatened species.

The Project Site is located in an urbanized area of the City. The Project Site is currently developed with two commercial buildings (approximately 23,133 square feet) and a surface parking lot. The surrounding area is largely developed with mixed commercial and residential land uses; roadways, including freeways; and utility infrastructure. No natural habitat that would support endangered, rare, or threatened species exist on the Project Site or in the areas surrounding the Project Site. No trees are located on the Project Site. The only vegetation of the Project Site is a Hollywood juniper bush, which would be removed as part of the Project. This plant is ornamental and provides no habitat for any endangered, rare, or threatened species.

Discussion of 15332(d)

Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

TRAFFIC

The information in this section is based on the Traffic Assessment for Proposed Eldercare (Assisted Living) Residential Project, prepared by Overland Traffic Consultants, Inc., October 29, 2019, included in Appendix A.

CEQA Analysis of Transportation Impact

Pursuant to the new CEQA Section 15064.3, the Significance of Transportation Impacts shall be determined using the vehicle miles traveled (VMT) metric rather than level of service (LOS), which measures vehicle delay. The procedures associated with the VMT evaluation methodologies are described in Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG), including criteria for determining the need for such analyses related to CEQA, specifically, the project's consistency with adopted City plans and policies. In general, the TAG identifies that development projects that require discretionary action (by the City) are required to assess whether the project would conflict with or preclude implementation of any City programs, plans, ordinances, or policies addressing the area circulation system, if they result in a net increase of 250 or more daily vehicle trips, or are required to make modifications to the public right-of-way. The "screening" criteria for these evaluations are detailed below.

1. **Threshold T-1**: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle and pedestrian facilities?

Projects shall be evaluated for conformance with adopted City's transportation plans and policies for all travel modes. Projects that generally conform with and do not conflict with the City's development policies and standards addressing the circulation system, including vehicular, transit, bicycle and pedestrian facilities will generally be considered consistent.

Screening Criteria for Threshold T-1

If the development project requires a discretionary action, and the answer is yes to any of the following threshold questions, further analysis will be required to assess whether the proposed project would negatively affect existing pedestrian, bicycle, or transit facilities:

1.1 Would the project generate a net increase of 250 or more daily vehicle trips?

No. Using the VMT calculator for screening purposes, the Project would result in a net reduction of approximately 149 daily trips, without the need for any Transportation Demand Management (TDM) strategies.

1.2. Is the project proposing to or required to make any voluntary or required, modifications to the public right-of-way (i.e. street dedications, reconfigurations of curb lines, etc.)?

Yes. Pursuant to the Mobility Element street standards, a 5-foot street dedication is required for Ventura Boulevard but no roadway widening adjacent to the Project Site.

1.3 Is the project on a lot that is ½ acre or more in total gross area, or is the project's frontage along a street classified as an Avenue or Boulevard (as designated in the Mobility Plan 2035) 250 linear feet or more, or is the project's frontage encompassing an entire block along an Avenue or Boulevard (as designated in the Mobility Plan 2035)?

No. The Project Site is approximately 0.9 acres (39,421 square feet). Ventura Boulevard is designated a Boulevard II street. The Project Site's Ventura Boulevard frontage is 142.58 feet.

Threshold T-1 Finding

The Project reduces the threshold daily trip limit by 16 daily trips without any TDM strategies. The Project trip analysis provided by this assessment demonstrates that no significant circulation deficiencies have been identified, consistent with the prior traffic impact analysis conducted and approved by LADOT in June 2018 (June 26, 2018, DOT Case No. VEN17 - 106049).

The Project does not obstruct or conflict with the City development policies and standards for the transportation system. Therefore, the Project would not have a significant transportation impact under Threshold T-1.

2. **Threshold T-2.1:** Does the project conflict or would it be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

The intent of this threshold is to assess whether a land use project causes substantial VMT. LADOT has developed the following screening and impact criteria to address this question:

Screening Criteria for Threshold T-2.1

2.1-1 Would the project generate a net increase of 250 or more daily vehicle trips?

No. Using the VMT calculator for screening purposes, the Project would result in a net reduction of approximately 149 daily trips, without the need for any TDM strategies.

2.1-2. Would the project generate a net increase in daily VMT?

No. The VMT calculator estimated that existing commercial uses on the Project Site generate 4,402 VMT, and the Project would generate 3,008 VMT, a reduction of 1,394 VMT. (Note that TDM strategies are not considered for the purpose of screening.)

The Project's inclusion of the bike parking would further reduce the VMT by an additional 19 VMT, for a total VMT reduction of 1,413 VMT.

Threshold T-2.1 Finding

The Project trip analysis provided by this assessment, as documented in the non–CEQA access and circulation review below, found no system deficiencies or any Project-generated adverse effects on the environment.

LADOT has identified thresholds for significant VMT impacts for each of the 7 Area Planning Commission (APC) sub-areas. The Project Site is in the South Valley APC sub-area, which has a daily household VMT per capita threshold of 9.4 and a work VMT per employee of 11.6 (15 percent below the existing VMT per capita for the South Valley APC). The results of the VMT evaluation show that the Project has a household VMT per capita value of 6.8 and a 6.4 work VMT per employee with the bike parking TDM strategy.

A TDM strategy has been included as part of the project to further reduce the project VMT. The TDM strategy is as follows:

Bike Parking - Providing short-term and long-term bicycle parking spaces in accordance with LAMC Section 12.21.A.4(u).

3. **Threshold T-3.1:** Does the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the Project Site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site.

Screening Criteria for Threshold T-3.1

3.1 Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?

No. The Project includes moving the existing Ventura Boulevard driveway approximately 20 feet westerly. No additional driveways would be added to provide vehicular access to the site.

3.2 Is the project proposing to, or required to make any voluntary or required, modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?

Yes. Pursuant to the Mobility Element street standards, a 5-foot street dedication is required for Ventura Boulevard but no roadway widening adjacent to the Project Site.

Threshold T-3.1 Finding

The 5-foot dedication would provide for a 15 -foot-wide sidewalk along the Project Site frontage.

The Project would not increase the number of vehicular conflict points and would reduce the number of vehicle trips, which would reduce conflicts with other vehicles, pedestrian and bicycles. The Project would not involve any design features that are unusual for the area or any incompatible uses. Therefore, vehicular access impacts would be less than significant.

Non-CEQA Transportation Analysis

Pedestrian, Bicycle, and Transit Access Assessment

Purpose

The pedestrian, bicycle, and transit facilities assessments are intended to determine a project's potential effect on pedestrian, bicycle, and transit facilities in the vicinity of a proposed project. The deficiencies could be physical (through removal, modification, or degradation of facilities) or demand-based (by adding pedestrian or bicycle demand to inadequate facilities).

Removal or Degradation of Facilities

The Project would not remove, modify or degrade any pedestrian, bicycle, and transit facilities in the vicinity of the Project Site. In fact, any existing damaged or off-grade sidewalk, curb and gutter along the property frontage will be repaired under LAMC Section 12.37.

Project Use Intensification of Use

The Project is located on Ventura Boulevard, which is designated a Boulevard II roadway and is included in the Transit Enhanced Network, Bicycle – Enhanced Network and Pedestrian District. There are two Rapid transit, one local and one commuter express line within 660 feet of the project site at Woodley Avenue and Ventura Boulevard. The anticipated level of transit increase is not expected to adversely affect the current ridership of the transit services in the area. No bike facilities are currently located along this segment of Ventura Boulevard.

The proposed elderly care facility would not overburden any pedestrian, bike, or transit facilities.

Project Access, Safety, and Circulation Evaluation

Purpose

Project access and circulation is evaluated for safety, operational, and capacity constraints using vehicle level of service (LOS) to identify circulation and access deficiencies that may require specific operational improvements.

Evaluation Findings

A circulation evaluation has been reviewed by providing an update to the June 2018 approved traffic study for the Project Site. The results of the evaluation show that the proposed eldercare development would not create any circulation and access deficiencies on the existing streets or near-by intersections, pedestrian, bicycle, and transit facilities

Non-CEQA Analysis

The circulation evaluation has been calculated using the LADOT Critical Movement Analysis (CMA) method at seven intersections reviewed under the prior traffic study and project approval. The CMA analysis method quantifies the operating conditions of an intersection as described on Table 1.

In consultation with the Los Angeles Department of Transportation (LADOT), the Traffic Impact Analysis evaluates traffic conditions at the following study intersections:

1. Hayvenhurst Avenue and Ventura Freeway Westbound Off Ramp
2. Hayvenhurst Avenue and Ventura Freeway Eastbound On Ramp / Magnolia Boulevard
3. Ventura Boulevard and Hayvenhurst Avenue
4. Ventura Boulevard and Libbit Avenue
5. Ventura Boulevard and Woodley Avenue
6. Ventura Boulevard and Haskell Avenue (west)
7. Ventura Boulevard and the 405 Freeway Southbound On Ramp / 101 Freeway Eastbound Off Ramp / Sherman Oaks Avenue.

Table 1
LOS Definitions for Signalized Intersections (CMA Method)

LOS	Intersection Capacity Utilization	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several cycles.
F	> 1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980.

The Traffic Impact Analysis assumes a Project buildout year of 2022. Upon completion, it is estimated that the Project would generate approximately -60 net new trips per day at the study intersections, including 1 AM and -4 PM net peak-hour trips (refer to Table 2).

Table 2
Trip Generation

ITE Code	Land Use	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
	Proposed Project								
254	Assisted Living	145 beds[1]	377	18	10	28	14	24	38
	Existing Use								
710	Office	12,818 sf	141	18	2	20	3	16	19
	Transit Credit	10%	(14)	(2)	(0)	(2)	(0)	(2)	(2)
720	Medical	2,831 sf	102	5	2	7	3	7	10
	Transit Credit	10%	(10)	(1)	(0)	(1)	(0)	(1)	(1)
826	Specialty Retail	2,235 sf	99	2	1	3	3	3	6
	Transit Credit	10%	(10)	(0)	(0)	(0)	(0)	(0)	(0)
	Pass-by	10%	(9)	(0)	(0)	(0)	(0)	(0)	(0)
932	Restaurant	1,500 sf	191	0	0	0	9	6	15
	Transit Credit	10%	(19)	0	0	0	(1)	(1)	(2)
	Pass-by	20%	(34)	0	0	0	(2)	(1)	(3)
	Vacant	4,607 sf	-	-	-	-	-	-	-
	Total Existing		*437*	*22*	*5*	*27*	*15*	*27*	*42*
	Net Total		**-60**	**-4**	**5**	**1**	**-1**	**-3**	**-4**

[1] *This analysis conservatively assumes 145 units, instead of 123 units as currently proposed.*

Source: Overland Traffic Consultants, Inc., 2019

The Traffic Impact Analysis assessed existing (2017) and future (2022) AM and PM peak-hour traffic conditions at the study intersections in the vicinity of the Project Site. The cumulative traffic conditions with the development of 22 potential related projects in the surrounding area were also assessed (refer to Table 3 in the Update to the July 2018 Traffic Study included in Appendix A), with an additional 1.0 percent annual growth factor from 2017 to 2020 to account for ambient growth.

LADOT's intersection LOS significance thresholds are shown on Table 3. Based on these thresholds, as shown on Table 4, the Project would not result in traffic impacts at any of the study intersections under the existing or future conditions. Therefore, no Project impacts related to traffic LOS would occur.

Table 3
LADOT Intersection Significance Thresholds

Intersection Conditions with Project Traffic		Project-related Increase in V/C Ratio
LOS	**V/C**	
C	> 0.701 - 0.800	Equal to or greater than 0.040
D	> 0.801 - 0.900	Equal to or greater than 0.020
E, F	> 0.901	Equal to or greater than 0.010
Source: LADOT.		

Table 4
Intersection LOS Impacts

Intersection	Peak Hour	Existing		Existing + Project		Future (2022) Without Project		Future (2022) + Project		Impact?
		CMA	LOS	CMA	LOS	CMA	LOS	CMA	LOS	
1. Hayvenhurst Ave. &	AM	0.835	D	0.835	D	0.943	E	0.942	E	No
101 Fwy. WB Off Ramp	PM	0.605	B	0.605	B	0.685	B	0.685	B	No
2. Hayvenhurst Ave. &	AM	0.813	D	0.813	D	0.919	E	0.918	D	No
101 Fwy EB On Ramp/Magnolia Blvd.	PM	0.657	B	0.657	B	0.743	C	0.742	C	No
3. Hayvenhurst Ave. &	AM	0.985	E	0.985	E	1.144	F	1.143	F	No
Ventura Blvd.	PM	0.786	C	0.786	C	0.923	E	0.923	D	No
4. Ventura Blvd. &	AM	0.715	C	0.714	C	0.840	D	0.840	D	No
Libbit Ave.	PM	0.670	B	0.669	B	0.808	D	0.808	C	No
5. Ventura Blvd. &	AM	0.659	B	0.660	B	0.769	C	0.770	C	No
Woodley Ave.	PM	0.615	B	0.615	B	0.729	C	0.729	C	No
6. Ventura Blvd. &	AM	0.749	C	0.750	C	0.874	D	0.874	D	No
Haskell Ave.	PM	0.608	B	0.607	B	0.740	C	0.740	C	No
7. Ventura Blvd. &	AM	0.913	E	0.914	E	1.136	F	1.136	F	No
405 Fwy. SB On/101Fwy. EB	PM	1.107	F	1.107	F	1.339	F	1.339	F	No
Off/Sherman Oaks Ave.										
Source: Overland Traffic Consultants, Inc., 2019										

NOISE

The analysis below is based on technical Noise Study prepared by Noah Tanski Environmental Consulting (refer to Appendix B).

Regulatory Setting

General Plan Noise Element

The City's General Plan contains a Noise Element that includes objectives and policies intended to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to manage long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element contains no quantitative or other thresholds of significance for evaluating a project's noise impacts. However, the

Noise Element does contain a land use and noise compatibility table, which is included as Table 5. Policy P16 of the Noise Element instructs to use, "as appropriate," this table "or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter…"[1] "Noise sensitive" uses are defined as "single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings, and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks."[2] The Noise Element further instructs that the table is designed "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels."

Table 5
City of Los Angeles Noise Element – Guidelines for Noise Compatible Land Use

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	**55**	**60**	**65**	**70**	**75**	**80**
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditoriums, Concert Halls, Amphitheaters	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Industrial, Manufacturing, Utilities, Agriculture	A	A	A	A	A/C	C/N	N

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

Source: Noise Element of the Los Angeles City General Plan – Exhibit I

[1] *Noise Element of the Los Angeles City General Plan, February 1999.*

[2] *Ibid.*

Los Angeles Municipal Code

The LAMC contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations.

Section 41.40(a) would prohibit the Project's construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

> *SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED*
>
> (a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.
>
> (c) No person, other than an individual homeowner engaged in the repair or construction of this single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance is subdivision (a), which institutes a maximum noise limit of 75 dBA at 50 feet for the types of construction vehicles and equipment that would be required for the Project's construction. However, the LAMC notes that these limitations would not necessarily apply if it can be proven that compliance would be technically infeasible despite the use of noise-reducing means or methods.

> *SEC.112.05 MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS*

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Any amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the Project's property line, as the Project is located within 500 feet of residential zones.

SEC.112.01 RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Existing Conditions

Project Site

The Project Site currently contains a variety of office and retail uses, as well as related surface parking. Sources of noise associated with these existing uses include on-site auto-related noises related to the surface parking lot and off-site traffic noises from vehicle trips to and from the site. The existing buildings also contain roof-mounted heating, ventilation, and air conditioning (HVAC) and other mechanical systems, but these systems were not audible at any noise measurement location over the course of the field noise study (discussed below). The lone restaurant use contains a small outdoor seating area, though this was not in use at the time of the field noise study.

Noise-Sensitive Receptors

Noise-sensitive land uses in the vicinity of the Project Site include but are not limited to the following:

- Moorpark Street Residences: The Project Site is located as near as 20 feet south of single-family residences located along Moorpark Street.
- Encino Hospital Medical Center: Hospital buildings and facilities are located approximately 145 feet west of the Project Site.
- Serrano Apartments: This mixed-use apartment building is located at 16110 Ventura Boulevard, approximately 300 feet southeast of the Project Site.

Existing Ambient Noise Conditions

On November 1, 2019, noise measurements were obtained at locations surrounding the Project Site to determine the baseline ambient noise conditions of nearby receptors. The existing noise environment near Encino Hospital Medical Center and Serrano Apartments is consistent with these receptors' locations along Ventura Boulevard, a major arterial roadway. However, noise levels along Moorpark Street, a residential roadway, are reduced as this street experiences limited thru traffic. Noise from aircraft landing at Van Nuys Airport was intermittently audible, but no more than a minor component of ambient noise levels, especially along Ventura Boulevard. Ambient noise levels were purposefully measured between approximately 11:30 A.M. and 1:00 P.M., an off-peak traffic period that typically corresponds with reduced environmental noise conditions. Measured noise levels are shown on Table 6.

Table 6
Existing Noise Levels

Noise Measurement Location	Sound Level (dBA L_{eq})
1. Ventura Blvd. – near Serrano Apartments	69.1
2. Ventura Blvd. – near Encino Hospital Medical Center	72.0
3. Moorpark St. – N of Project	50.1
Source: NTEC, 2019.	

Thresholds of Significance

On-Site Construction Noise Threshold

Based on guidelines from the Department of City Planning, a project's on-site construction noise impact would be considered significant if construction noise levels would exceed the 75 dBA at 50 feet maximum noise level limit for powered equipment as established by Section 112.05 of the LAMC. This regulation applies to the on-site operations of powered construction equipment and not to road-legal trucks operating on public rights-of-way.

Operational Noise Thresholds

In addition to applicable City standards and guidelines that would regulate or otherwise manage a project's operational noise impacts, the following criteria are adopted to assess the impacts of the Project's operational noise sources:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise and land use compatibility categories, as defined by the City's General Plan Noise Element (refer to Table 5).
- Project operations would cause any 5 dBA or greater noise increase.[3]

[3] *As a 3 dBA increase represents a barely noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. For instances when the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a readily noticeable 5 dBA increase would still be considered significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.*

Project Impacts

On-Site Construction Activities

Project construction would generate noise during the estimated 17 months of demolition, excavation/grading, building construction, paving, and architectural coatings activities. During all construction phases, noise-generating activities would be permitted to occur at the Project Site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction activities would be permitted to occur between 8:00 A.M. and 6:00 P.M. However, construction activities are anticipated to follow a standard weekly work schedule of Monday through Friday, eight hours per day (generally 7:00 A.M. to 3:00 P.M.).

On-site construction activities would include the use of heavy equipment such as excavators, loaders, and bulldozers. Vehicles such as forklifts, skid steer loaders, crane trucks, drill rig trucks, concrete pumping trucks, and concrete mixing trucks would also be required. Smaller equipment such as generators and various powered hand tools would also be used throughout all construction phases.

Regulatory compliance with LAMC Section 112.05 would ultimately limit any noise levels from powered construction equipment to 75 dBA at 50 feet or below, as the Project site is located within 500 feet of residential-zoned neighborhoods located north and south of Ventura Boulevard. Standard, industry-wide "best practices" for construction in urban or otherwise noise-sensitive areas would ensure that the Project's powered construction equipment noise levels do not exceed the City's 75 dBA at 50 feet threshold of significance. "Best practices" utilized by the Project would include the following:

- Erecting temporary noise barriers around the Project's perimeter, and/or pre-building any proposed permanent masonry walls prior to the commencement of major noise-generating construction activities. The height and material of the noise barriers would be designed to achieve a noise reduction of at least 10 dBA at 50 feet.

- Warming-up or staging equipment away from noise-sensitive receptors.

- Placing generators, compressors, and other noisy equipment within acoustic enclosures or behind baffles or screens, especially when such equipment has line of sight to nearby noise-sensitive receptors and is not located within the confines of the Project's perimeter noise barriers.

As shown on Table 7, use of these industry standard best practices would ensure that the Project's powered equipment noise levels do not exceed the 75 dBA at 50 feet limit that is established by LAMC Section 112.05 and recommended as the threshold of significance by the City of Los Angeles Department of Planning. Therefore, because the Project would comply fully with LAMC Section 112.05, its construction noise impact from on-site sources would be less than significant.

Table 7

Construction Noise Levels

Powered Construction Equipment	1-hour at 50 feet (dBA L_{eq})	Noise Barrier Attenuation	1-hour at 50 feet After Best Practices (dBA L_{eq})	Consistent with LAMC Sec.112.05?
Auger Drill Rig	77.4	-10	67.4	Yes
Backhoe	73.6	-10	63.6	Yes
Compressor (air)	73.7	-5	68.7	Yes
Concrete Mixer Truck	74.8	-10	64.8	Yes
Concrete Pump Truck	74.4	-10	64.4	Yes
Concrete Saw	82.6	-10	72.6	Yes
Truck-Mounted Crane[A]	83.0	-10	73.0	Yes
Dozer	77.7	-10	67.7	Yes
Drill Rig Truck	72.2	-10	62.2	Yes
Excavator	76.7	-10	66.7	Yes
Front End Loader	75.1	-10	65.1	Yes
Generator	77.6	-5	72.6	Yes
Generator (<25KVA)	69.8	-5	64.8	Yes
Gradall	79.4	-10	69.4	Yes
Jackhammer	81.9	-10	71.9	Yes
Paver	74.2	-10	64.2	Yes
Roller	73.0	-10	63.0	Yes
Welder/Torch	70.0	-5	65.0	Yes

[A] Truck-mounted crane noise level was sourced from the FTA's Transit Noise and Vibration Impact Assessment manual, as this equipment is not represented in FHWA RCNM 1.1.

Source: Noise levels derived from the Federal Highway Administration's Roadway Construction Noise Model, version 1.1 (FHWA RCNM 1.1).

Off-Site Construction Activities

Section 112.05 of the LAMC does not regulate off-site noise emissions from road legal trucks such as delivery vehicles, concrete mixing trucks, pumping trucks, haul trucks, and worker vehicles. However, the operations of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC. Also, as stated earlier, construction activities are only anticipated to occur Monday through Friday between the hours of 7:00 A.M. and 3:00 P.M.

Trucks and other construction-related vehicles would access the Project site over the course of all construction phases. The Project's peak daily construction vehicle trip generation would occur during its grading phase when a maximum 1,100 cubic yards of cut soils would be transported to a regional landfill

in an estimated 69 haul trucks. Over the course of a standard eight hour work day, this would equate to an average of less than nine truck trips per hour. This would have a nominal effect on roadside noise conditions between the Project and ramps to the I-405. According to the Federal Highway Administration's (FHWA) Traffic Noise Model (TNM) 2.5 modeling, nine haul truck trips per hour would be capable of generating roadside noise levels of just 61.4 dBA L_{eq} along Ventura Boulevard between the Project site and these ramps. As field noise measurements indicate that off-peak-hour daytime ambient noise levels are approximately 70 dBA L_{eq} along Ventura Boulevard, the Project's maximum haul truck deployment would not be capable of increasing roadside ambient noise levels by a discernable degree (less than 1.0 dBA). Constructions trucks would not access or exit the Project Site using nearby residential streets. Therefore, Project noise impact from off-site construction sources would be less than significant.

On-Site Operational Noise

The Project's potential on-site operational noise sources are identified and discussed below.

Mechanical Equipment

Regulatory compliance with LAMC Section 112.02 would ultimately ensure that noises from mechanical sources such as HVAC systems do not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation and the relatively quiet operation of modern HVAC systems, as well as distances to surrounding sensitive receptors, it is unlikely that the Project's HVAC systems would be capable of increasing off-site noise levels by a discernable degree. Additionally, the Project site's existing uses contain rooftop-mounted HVAC equipment. The Project would replace these units with more modern, and thus, presumably quieter and more efficient systems that would be mounted at the new proposed rooftop elevation of 71 feet, nearly 50 feet higher than the existing use's current rooftop equipment. This height, in addition to the use of parapets, louvers, and other screening devices, would lengthen sound paths from the Project's HVAC equipment to Moorpark Street Residences, as compared to the height and configuration of the site's current structures.

Auto-Related Activities

A total of 77 parking spaces would be located in fully enclosed ground floor and basement parking areas. Intermittent noises, such as doors slamming or engines starting, are unlikely to be audible at nearby receptors. The Project Site's existing parking area contains approximately 60 parking spaces, but none of which is fully enclosed. As a result, it is likely that the Project would result in a net decrease of audible auto-related noises associated with parking, especially considering that the Project is also projected to result in a net decrease of 60 vehicle trips per day as compared to the Project Site's existing uses.[4]

[4] *Overland Traffic Consultants, Inc. 2019.*

A drop-off area for residents would be oriented towards the southern portion of the Project Site near Ventura Boulevard, where noise levels are elevated due to continuous traffic noises. The massing of the proposed eldercare building would obstruct any line of sight between this area and Moorpark Street Residences.

Outdoor Community Areas

The Project would include a number of outdoor community spaces for residents. On the ground level, a 3,280 square-foot courtyard would act as a buffer space between the proposed eldercare building and the single-family residential uses to the north. Noise sources associated with this courtyard area are unlikely to exceed light conversation. Vocal noise from speech/conversation averages between 55 and 67 dBA at a reference distance of one meter, in proportion to background noise levels.[5] As this courtyard would be located approximately 250 feet north of Ventura Boulevard and would be further shielded from Ventura Boulevard by the massing of the eldercare building, background noise levels at this courtyard would likely be subdued, and speech/conversation noise levels would fall within the lower range of this spectrum. Given the rapid attenuation of speech/conversation noise, use of this courtyard area would not be expected to result in meaningful noise increases at Moorpark Street Residences.

The Project's second level would include an outdoor patio area. This space would be located over 100 feet south of Moorpark Street Residences, and the massing of the eldercare building would fully shield lines of sight from the space to this receptor. Noise sources associated with this patio area (e.g. speech/conversation, dining, etc.) are not likely to be audible at Moorpark Street Residences and would not result in discernable off-site noise increases.

Finally, the Project's sixth level would include a 1,410 square foot roof deck oriented towards Ventura Boulevard. This space would be located over 200 feet south of Moorpark Street Residences, and the massing of the eldercare building would fully shield lines of sight from the space to this receptor. Noise sources associated with this roof deck area would not be audible at Moorpark Street Residences.

For the reasons stated above, the Project on-site operational noise impacts would be less than significant.

Off-Site Operational Noise

As discussed above, the Project is estimated to result in a net decrease of 60 vehicle trips per weekday. During the A.M. peak hour, the Project would generate just one net new trip; during the P.M. peak hour, the Project would result in a net decrease of 4 trips. The Project's single net new A.M. peak hour trip would have no impact on surrounding roadway noise levels. The Project would have no potential to increase

[5] *EPA, Speech Levels in Various Noise Environments, May 1977.*

roadway noise levels by at least 3 dBA CNEL, which corresponds with an approximate doubling of traffic volume, and this impact would be less than significant.

AIR QUALITY

The information in this section is based on the technical Air Quality Study prepared by Noah Tanski Environmental Consulting included in Appendix C.

Existing Emissions

The Project Site is currently developed with approximately 23,133 square feet of commercial uses and surface parking. Emissions associated with existing Project Site development are shown on Table 8.

Table 8
Estimated Existing Emissions

Emission Source	Pounds per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	<1	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	5	14	<1	3	1
Total Operations	**2**	**5**	**14**	**<1**	**3**	**1**
Source: NTEC, 2019, based on CalEEMod 2016.3.2 model runs. Refer to Appendix C.						

Sensitive Receptors

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

Sensitive receptors near the Project Site include the following:

- Moorpark Street Residences: The Project Site is located as near as 20 feet south of single-family residences located along Moorpark Street.

- Encino Hospital Medical Center: Sensitive hospital buildings and facilities are located approximately 145 feet west of the Project Site.

- Serrano Apartments: This mixed-use apartment building is located at 16110 Ventura Boulevard, approximately 300 feet southeast of the Project Site.

Project Impacts

Construction Emissions

Construction of the Project is anticipated to take approximately 17 months. During this time, a variety of heavy-duty diesel powered vehicles and equipment would be operated on-site. Demolition and grading for the Project would require vehicles such as excavators, bulldozers, loaders, and other heavy equipment. The building construction phase would require vehicles such as forklifts, man lifts, skid steer loaders, and a crane or truck-mounted crane. Table 9 summarizes the proposed construction schedule that was modeled for air quality impacts.

Table 9
Approximately Project Construction Schedule

Phase	Approximate Duration
Demolition	2 weeks
Grading	11 weeks
Building Construction	9 months
Paving	7 weeks[1]
Architectural Coatings	4 months[1]

[1] *Paving and the application of architectural coatings would overlap with building construction.*

The Project's daily regional and local emissions from construction, as estimated using SCAQMD's CalEEMod 2016.3.2 model, are shown on Table 10. Regional thresholds and localized significance thresholds (LSTs) for each air pollutant are also shown for comparison. As shown, the Project's regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Also, local emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. Therefore, the Project's construction-related emissions impacts on regional and localized air quality would be less than significant.

Table 10
Estimated Daily Construction Emissions

Construction Phase Year	Pounds Per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
2021	3	36	20	<1	4	2
2022	10	12	16	<1	1	1
Maximum Regional Total	***10***	***36***	***20***	***<1***	***4***	***2***
Regional Significance Threshold	***75***	***100***	***550***	***150***	***150***	***55***
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
2021	2	23	18	<1	3	2
2022	11	19	22	<1	1	1
Maximum Localized Total	*11*	*23*	*22*	*<1*	*3*	*2*
Localized Significance Threshold	***--***	***103***	***426***	***--***	***4***	***3***
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

Source: NTEC, 2019, based on CalEEMod 2016.3.2 model runs. LST analysis based on 1-acre site with 25-meter distances to receptors in SRA No. 6, "West San Fernando Valley." Refer to Appendix C.

Operational Emissions

Emissions associated with the Project's long-term operation were also calculated using CalEEMod 2016.3.2. As shown on Table 11, the Project would not introduce any new major sources of air pollution. Emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$, nor would the emissions exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's operational-related emissions impacts on regional and localized air quality would be less than significant.

Table 11
Estimated Daily Operational Emissions

Emission Source	Pounds per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area	3	<1	10	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	1	3	9	<1	3	1
Regional Total Operations	***4***	***4***	***20***	***<1***	***3***	***1***
Less Existing Operations	*2*	*5*	*14*	*<1*	*3*	*1*
Net Regional Total	***2***	***-1***	***3***	***0***	***1***	***0***
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	**3**	**<1**	**10**	**<1**	**<1**	**<1**
Localized Significance Threshold	**--**	**103**	**426**	**--**	**1**	**1**
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: NTEC, 2019, based on CalEEMod 2016.3.2 model runs. LST analysis based on 1-acre site with 25-meter distances to receptors in SRA No. 6, "West San Fernando Valley." Refer to Appendix C.

WATER QUALITY

To address water quality during the Project's construction phase, in compliance with existing regulations, the Project Applicant would be required to prepare and implement a stormwater pollution prevention plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include Best Management Practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, no water quality impacts would occur during Project construction.

During the Project's construction phase, in accordance with the City's Low Impact Development (LID) Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control

measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the Project would satisfy the City's water quality standards. Therefore, no Project impacts related to operational water quality would occur.

Discussion of 15332(e)

The site can be adequately served by all required utilities and public services.

PUBLIC SERVICES

Fire Protection

The Project includes removal of two commercial buildings and a surface parking lot from the Project Site and development of site with a 115,886-square-foot eldercare development consisting of 107 assisted living dwelling units and 16 memory care guest rooms (with a total of 17 beds), for a total of 123 residential units potentially increasing the need for fire protection services at the Project Site. The factors that the Los Angeles Fire Department (LAFD) considers in determining whether fire protection services for a project is adequate include: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement.[6] Pursuant to LAMC Section 57.09.07, the maximum response distance between a high-density residential/commercial neighborhood land use and a LAFD station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems. The Project Site is served by several fire stations, as shown on Table 12. As shown, the Project Site is located approximately 1.0 mile from Fire Station 83. Since the Project Site is located within the distance identified by LAMC Section 57.09.07, the Project need not be constructed with automatic fire sprinkler systems and any additional fire protection as required by the LAFD Chief, unless other building and safety codes supersede this.

Table 12
Fire Stations Serving the Project Site

No.	Address	Distance from Project Site
83	4960 Balboa Boulevard	1.0 mile
88	5101 Sepulveda Boulevard	1.8 miles
109	16500 Mulholland Drive	2.5 miles
Source: LAFD, http://www.lafd.org/fire-stations/find-your-station, 2019.		

[6] *L.A. CEQA Thresholds Guide, City of Los Angeles, 2006.*

All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Therefore, the Project would not result in impacts related to emergency access. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Through compliance with these mandatory requirements, Project impacts related to fire protection services would not occur.

Police Protection

The Project includes removal of two commercial buildings and a surface parking lot and development of the site with a 115,886-square-foot eldercare development consisting of 107 assisted living dwelling units and 16 memory care guest rooms (with a total of 17 beds), for a total of 123 residential units, potentially increasing the need for police protection services at the Project Site. However, in accordance with the City's regulations, the Project developer would be required to refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department (LAPD). Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. The Project would include standard security measures such as adequate security lighting, controlled residential access, and secure parking facilities. Through compliance with LAPD requirements, no Project impacts related to police protection services would occur.

Schools

The Project includes removal of two commercial buildings and a surface parking lot from the Project Site and development of the site with a 115,886-square-foot eldercare development consisting of 107 assisted living dwelling units and 16 memory care guest rooms (with a total of 17 beds), for a total of 123 residential units. The residents of the Project would not have school-aged children that would require school services. Additionally, the Project Applicant would be required to pay developer fees to the Los Angeles Unified School District (LAUSD). Pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address any potential indirect impacts to schools as a result of the Project. Therefore, no Project impacts to school services would occur.

Parks

The Project includes removal of two commercial buildings and a surface parking lot from the Project Site and development of the site with a 115,886-square-foot eldercare development consisting of 107 assisted living dwelling units and 16 memory care guest rooms (with a total of 17 beds), for a total of 123 residential units. The residents of the Project would not use off-site parks and recreational facilities. The Project includes approximately 13,569 square feet of useable open space, more than the required 11,225 square

feet. The open spaces areas include a 1,325-square-foot outdoor dining area on level 1; a 3,814-square-foot courtyard on level 2; a 1,145-square-foot roof deck space on level 6; 2,806 square feet of indoor common amenity space; and 4,479 square feet of private balconies. Provision of on-site open space would ensure the Project would not result in impacts to parks and recreational facilities.

Other Public Facilities

The Project includes removal of two commercial buildings and a surface parking lot from the Project Site and development of the site with a 115,886-square-foot eldercare development consisting of 107 assisted living dwelling units and 16 memory care guest rooms (with a total of 17 beds), for a total of 123 residential units. The purpose of the Project is to provide eldercare services to residents who live in the City. As such, the Project would not increase the number of residents in the City and thus, would not create a demand for library service beyond the existing demand. Therefore, the Project would not result in impacts related to library services.

UTILITIES AND SERVICE SYSTEMS

Wastewater

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board's (LARWQCB) discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity.

As shown on Table 13, the Project would generate a net increase of approximately 7,344 gallons of wastewater per day (or 0.007 mgd). With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, no Project impacts related to wastewater treatment would occur.

Water

The Los Angeles Department of Water and Power (LADWP) owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 mgd, with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season. As shown on Table 18, the Project would consume a net increase of approximately 6,069 gallons of water per day (or 0.006 mgd). With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project. Therefore, no Project impacts related to water treatment would occur.

Table 13
Estimated Wastewater Generation and Water Consumption

Land Use	Size	Water Consumption Rate[1]	Total (gallons/day)
Existing Uses to be Removed			
Office	15,086 sf	0.15 gpd/sf	2,263
Retail	5,537 sf	0.08 gpd/sf	443
Restaurant	1,500 sf	0.3 gpd/sf	450
		Total Existing	*3,156*
Proposed Uses			
Eldercare Facility	123 units	75 gpd/unit	9,225
		(Less Existing)	(3,156)
		Net Total	**6,069**

du = dwelling unit *gpd = gallon per day* *sf = square feet*

Note: Wastewater generation is assumed to equal water consumption.
[1] *Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.*

The City receives water from five major sources: 1) the Eastern Sierra Nevada watershed, via the Los Angeles Aqueduct (LAA); 2) the Colorado River, via the Colorado River Aqueduct; 3) the Sacramento-San Joaquin Delta, via the State Water Project (SWP) and the California Aqueduct; 4) local groundwater; and 5) recycled water. The amount of water obtained from these sources varies from year to year and is primarily dependent on weather conditions and demand.

As shown on Table 13, the Project would consume a net increase of approximately 6,069 gallons of water per day. According to the Los Angeles Department of Water and Power (LADWP), any project that is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the most recently adopted Urban Water Management Plan (UWMP), which is prepared by the LADWP to ensure that existing and projected water demand within its service area can be accommodated.[7] As discussed previously, the Project is consistent with the City's General Plan land use designation for the Project Site. Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in Los Angeles City Ordinance No. 180822 and in the Los Angeles Green Building Code (LAGBC) to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not require new or additional water supply or entitlements. Therefore, no Project impacts related to water supply would occur.

[7] *Los Angeles Department of Water and Power, Amir Tabakh, correspondence, February 11, 2015.*

Solid Waste

The primary landfills that serve the City include Lancaster Landfill, Chiquita Canyon Landfill, Sunshine Canyon City/County Landfill, Azusa Landfill, and the Calabasas Landfill. Permitted capacity and average daily disposal amounts for these landfills are shown on Table 14. As shown, the combined remaining available daily intake at the landfills serving the City is approximately 14,908 tons.

Table 14
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Lancaster	24	10.27	3,000	444	2,556
Chiquita Canyon Expansion	30	59.1	6,616	4,588	2,028
Sunshine Canyon	20	68.0	12,100	6,469	5,631
Azusa	28	55.7	6,500	1,356	2,144
Calabasas	12	5.5	3,500	1,128	2,549
				Total	**14,908**

Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2017 Annual Report, April 2019.

As shown on Table 15, the Project would generate a net increase of approximately 0.19 tons of solid waste per day. With a remaining daily capacity of 14,908 tpd, the existing landfill capacity would be adequate to accommodate the Project's solid waste generation. For these reasons, Project operation would not require new or expanded landfill capacity. Therefore, Project impacts related to solid waste would be less than significant.

Table 15
Estimated Solid Waste Generation

Land Use	Size	Generation Rate[1]	Total (tpd)
Existing Uses to be Removed			
Office	15,086 sf	0.006 lbs/day/sf	0.045
Retail	5,537 sf	0.005 lbs/day/sf	0.013
Restaurant	1,500 sf	0.005 lbs/day/sf	0.003
		Total Existing	*0.061*
Proposed Uses			
Eldercare Facility	123 units	4 lbs/day/unit	0.25
		(Less Existing)	(0.061)
		Net Total	**0.19**

du = dwelling unit *lbs = pounds* *tpd = tons per day*

[1] *Source: CalRecyclewebsite: http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm, 2014.*

Note: Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill. Numbers might not add due to rounding.

Categorical Exemption Exceptions

Section 15300.2 (Exceptions), Article 19, Chapter 3, Title 14 of the California Code of Regulations includes exceptions to categorical exemptions for certain activities. For the reasons discussed below, none of the exceptions apply to the Project.

15300.2. Exceptions

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock

outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

Discussion of Exceptions

Section 15300.2 (a) - Location:

Not applicable. The Project does not fall under the definitions of Classes 3, 4, 5, 5, or 11.

Section 15300.2(b) - Cumulative Impact:

The cumulative impact analysis considers the potential impacts associated with implementation of the Project in conjunction with other "related projects" within a 1.5-mile radius of the Project Site that could be developed within the same timeframe as the Project. The list of related projects includes 22 projects and is depicted on Table 3 in the Update to the July 2018 Traffic Study that was prepared for the Project (refer to the Appendix A). The source of this list is LADOT. As discussed below, the Project would not contribute to any significant cumulative impacts resulting from successive projects of the same type in the same place over time.

Air Quality

The SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[8] Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As discussed previously, the Project would not produce VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10} emissions in excess of SCAQMD's significance thresholds. As such, the

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

cumulative air quality impact of successive projects of the same type in the same place over time would not be significant.

Water Quality

The sites of the Project and the related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs it generally does not lead to substantial additional runoff, since new developments is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, the cumulative water quality impact of successive projects of the same type in the same place over time would not be significant.

Noise

None of the related projects shown on Table 3 in the Update to the July 2018 Traffic Study in Appendix A are in close proximity to the Project Site. As such, if the construction activities associated with the related projects overlapped with those of the Project, due to distance and location of sensitive receptors, no significant cumulative construction noise impacts would occur. As discussed previously, cumulative traffic noise impacts would be less than significant. Therefore, the cumulative noise impact of successive projects of the same type in the same place over time would not be significant.

Traffic

Cumulative traffic impacts were addressed previously under future (2020) traffic conditions (refer to Table 3 of this Categorical Exemption. As shown there, no significant cumulative impacts would occur. Thus, the cumulative traffic impact of successive projects of the same type in the same place over time would not be significant.

Public Services

Fire Protection

Implementation of the related projects on Table 3 in the Update to the July 2018 Traffic Study (refer to Appendix A) could result in a net increase in the number of residents and employees in the Project Site area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-density buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD

Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the proposed Project and related projects would contribute. Therefore, the cumulative impact to fire protection from successive projects of the same type in the same place over time would not be significant.

Police Protection

Implementation of the related projects listed on Table 3 in the Update to the July 2018 Traffic Study (refer to Appendix A) could result in a net increase in the number of residents and employees in the Project area and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the review and oversight of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the proposed Project and related projects would contribute. Therefore, the cumulative impact to police protection from successive projects of the same type in the same place over time would not be significant.

Schools

The related projects listed on Table 3 in the Update to the July 2018 Traffic Study (refer to Appendix A) could result in an increase in the number students in the Project Site area. However, similar to the applicant of the proposed Project, the applicants of all the related projects would be required to pay the state mandated applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, the cumulative impact to schools from successive projects of the same type in the same place over time would not be significant.

Parks

The related projects listed on Table 3 in the Update to the July 2018 Traffic Study (refer to Appendix A) could result in an increase demand for parks and recreational services. However, employees generated by the commercial projects and the commercial portions of mixed-use projects on the related projects list would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities. Thus, these project-generated employees would not contribute to the future demand on park and recreational facility services. The applicants of related residential projects would be subject to the City's parkland fees (e.g., Quimby Fees and/or Park and Recreation fees for non-subdivision projects) and to

minimum open space requirements, ensuring that any potential impacts to parks and recreational facilities would be less than significant. As discussed previously, the Project would not create a demand for parks, and no impacts would occur. Therefore, the cumulative impact to parks from successive projects of the same type in the same place over time would not be significant.

Other Public Facilities

Implementation of the related projects listed on Table 3 in the Update to the July 2018 Traffic Study (refer to Appendix A) could increase the demand for library services in the Project area. Similar to the proposed Project, the related residential projects would be subject to the standards to determine demand for library facilities used by the City, and would likely be required to comply with regulatory requirements where applicable. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. Additionally, the Project would not result in an increase in the number of residents in the City and thus, would not create an increased demand for library services; no impacts would occur. Therefore, the cumulative impact to libraries from successive projects of the same type in the same place over time would not be significant.

Utilities

Wastewater

Implementation of the related projects listed on Table 3 in the Update to the July 2018 Traffic Study (refer to Appendix A) could increase the need for wastewater treatment. The remaining treatment capacity of the HTP (88 mgd) would accommodate the wastewater treatment requirements of the related projects. As discussed previously, the Project would create the need for a fraction of one percent of the remaining capacity of the HTP, and would not result in any significant impacts related to sewer treatment. No new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater impacts from successive projects of the same type in the same place over time would not be significant.

Water

Implementation of the related projects listed on Table 3 in the Update to the July 2018 Traffic Study (refer to Appendix A) could result in a net increase in water consumption within LADWP's service area. Similar to the Project, the water supply needs of those related projects that are consistent with the City's General Plan have been accounted for in the most recently adopted UWMP. However, the applicants of all projects within LADWP's service area would be required to consult with LADWP to determine the specific water supply needs of the project, appropriate water conservation measures to minimize water usage, and LADWP's ability to serve the project. In addition, as discussed previously, the Project would create the need for a fraction of one percent of the remaining capacity of the LAAFP, and would not result in any significant impacts related to water treatment. No new or upgraded treatment facilities would be required. As such, the cumulative water impacts of successive projects of the same type in the same place over time would not be significant.

Solid Waste

Implementation of the related projects listed on Table 3 in the Update to the July 2018 Traffic Study (refer to Appendix A) could increase the need for landfill capacity. However, all development in the City is required to comply with the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance to minimize the amount of solid waste generated by the development and the need for landfill capacity. As discussed previously, the landfills serving the Project area have available capacity. The Project would create a demand for less than a fraction of one percent of the remaining landfill capacity serving the Project area and would not result in any significant impacts. Therefore, cumulative solid waste impacts from successive projects of the same type in the same place over time would not be significant.

Section 15300.2(c) – Significant Effects Due to "Unusual Circumstances:

There are no unusual circumstances related to development of the Project's 123-unit eldercare facility at the Project Site. The Project includes infill development of the site with a 123-unit eldercare facility, and as discussed previously in detail, the Project would be consistent with the Specific Plan and LAMC, with the request for Eldercare Facility Unified Development permit. Additionally, the Project Site is not located in a designated "environmentally sensitive area" or other overlay that would denote special circumstances. While no unusual circumstances exist, as described above, there is also no reasonable possibility that any significant effects could result from development of the Project. Specifically, as analyzed above, the Project would not result in any impacts related to traffic, noise, air quality, water quality, public services, and/or utilities.

Section 15300.2(d) – Scenic Highways:

The Project Site is not visible from any scenic highway. Moreover, the Project would not result in any damage to scenic resources, such as significant trees, historic buildings, rock outcroppings, or similar type resources within an officially designated state scenic highway.

Section 15300.2(e) – Hazardous Waste Sites:

The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5.[9] Thus, the Project would not create a hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts related to this issue would occur.

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[9] *Department of Toxic Substances Control, http://www.envirostor.dtsc.ca.gov/public/map/?myaddress=16161+ventura+boulevard%2C+los+angeles%2C+ca, November 8, 2019.*

Section 15300.2(f) – Historic Resources

None of the existing residential buildings on the Project Site that would be removed as part of the Project are considered significant historical resources.[10] Neither of the existing buildings at the Project Site has been identified by "Survey LA" (the City's official Historic Resources Inventory) as potentially eligible for listing on the National Register of Historic Places, the California Register of Historic Resources or for designation as a local "Historic Cultural Monument." Moreover, the Project Site is not located within a designated Historic Preservation Overlay Zone (HPOZ) or identified on Survey LA as part of a potential future historic district.[11] Thus, demolition of the existing structures and development of the proposed Project would not result in any impacts related to historical resources.

[10] *Los Angeles Historic Resources Inventory, http://www.historicplacesla.org/map, November 8, 2019.*

[11] *SurveyLA, February 26, 2013, http://preservation.lacity.org/files/Encino-Tarzana%20Survey%20Report%202.26.13.pdf, November 8, 2019.*

APPENDIX A

TRAFFIC IMPACT ANALYSIS

APPENDIX B

AIR QUALITY MODELING RESULTS

APPENDIX C

NOISE MODELING RESULTS