IV. Environmental Impact Analysis

J. Land Use and Planning

1. Introduction

This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would physically divide an established community and whether the Project would conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. Section IV.B, *Air Quality*, evaluates the Project consistency with the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), Section IV.G, *Greenhouse Gas Emissions*, evaluates the Green New Deal (Sustainable City pLAn 2019) and the Los Angeles Green Building Code; Section O.I, *Utilities and Service Systems – Water Supply*, evaluates the Los Angeles Department of Water and Power (LADWP) 2020 Urban Water Management Plan; and Section IV.M, *Transportation*, evaluates the consistency with policies of the City of Los Angeles Mobility Plan 2035; transportation and mobility-related policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, and mobility and access policies of the Los Angeles River Design Guidelines.

2. Environmental Setting

a) Regulatory Framework

The following describes the primary regulatory requirements regarding land use and planning. Applicable plans and regulatory documents/requirements include the following:

- California Government Code Section 65302
- Senate Bill 375
- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines

- River Improvement Overlay
- Los Angeles River Revitalization Master Plan

(1) State

(a) California Government Code Section 65302

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

(b) Senate Bill 375

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

(2) Regional

(a) Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is

integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in VMT per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016-2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTA's)[1] by 6 percent and the share of new job growth in HQTAs by 15 percent.

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan), originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements,[2] including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

(i) Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide

1 HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minutes or less service frequency during peak commuting hours.

2 The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, State law permits the inclusion of optional elements which address needs, objectives or requirements particular to that city or county (Government Code Section 65303).

policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The Framework Element provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans.

(a) Land Use Chapter

The Framework Element's Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) that include standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to: reductions in VMT, reductions in noise impacts, improved efficiency in the use of energy, improved efficiency and thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment.

(b) Urban Form and Neighborhood Design Chapter

The Framework Element's Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the Framework Element through proper massing and design of buildings and second, to enhance the physical character of neighborhoods and communities within the City.[3] The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

(c) Open Space and Conservation Chapter

The Framework Element's Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social,

[3] City of Los Angeles General Plan Framework Element, page 5-1, et. seq.

and ecological imperative require the City to take full advantage of all existing open space elements. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

(d) Economic Development Chapter

The Framework Element's Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The Economic Development Chapter also establishes mutual development objectives for land use and economic development. The Economic Development Chapter sets forth policies for the development of an infrastructure investment strategy to support population and employment growth areas. The Economic Development Chapter also includes goals, objectives, and policies focused on preserving commercial uses within walking distance to residential areas, and promoting opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods. It also focuses on establishing a balance of land uses that provide for commercial and industrial development which meet the needs of local residents, sustaining economic growth, and assuring maximum feasible environmental quality.

(e) Transportation Chapter

The Framework Element's Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. While the focus of the Transportation Chapter is on guidance for transportation investments, the Transportation Chapter also includes goals, policies and objectives that overlap with policies included in other Framework Element chapters regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter of the Framework Element is implemented through the General Plan's Mobility Plan 2035 (Mobility Plan), which is a comprehensive update of the General Plan Transportation Element.

(f) Infrastructure and Public Services Chapter

The Framework Element's Infrastructure and Public Services Chapter addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forests. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Strategic public investment is advocated in the Infrastructure and Public Services Chapter as a method to stimulate economic development as well as maintain environmental quality. Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

(ii) Transportation Element

The Transportation Element (Mobility Plan), adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates "complete streets" principles and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (AB 1358).

The purpose of the Mobility Plan is to present a guide to the future development of a Citywide transportation system for the efficient movement of people and goods. While the Mobility Plan focuses on the City's transportation network, it complements other components of the General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the provision and use of alternative transportation modalities. The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

(iii) Conservation Element

The City of Los Angeles General Plan includes a Conservation Element (Conservation Element), which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue protecting historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. The Conservation Element refers to the Open Space Element for a discussion of open space aspects of the City, including park sites.

(iv) Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development.[4] Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs,

[4] Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015.

policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others. The plan includes *Chapter 5 An Environment Where Life Thrives,* which identifies the following environmental policies:

- Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.
- Reduce negative health impacts for people who live and work in close proximity to industrial uses and freeways through health promoting land uses and design solutions.
- Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.
- Explore opportunities to continue to remediate and redevelop brownfield sites.
- Increase the city's resilience to risks (increasing temperatures and heat related effects, wildfires, reduced water supply, poor air quality, and sea level rise) resulting from climate change.
- Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution.

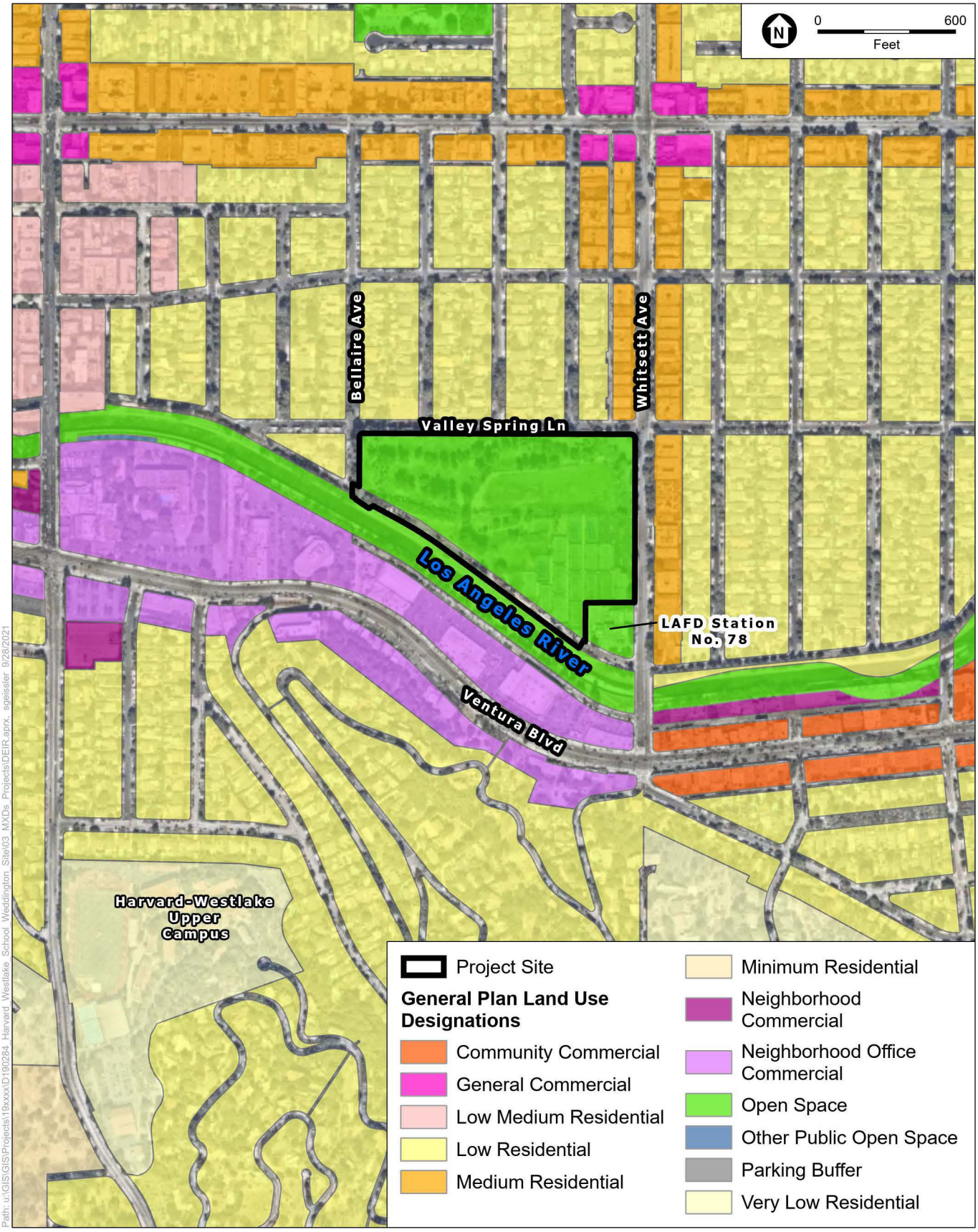
This General Plan Element includes policies pertaining to the arrangement of land uses within the City related to public health hazards, and which reinforce other State, regional, and local policies which call for improvements to air quality, reducing GHGs, protection from hazards and hazardous materials, and reductions in vehicle trips.

(v) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan

The City's 1998 Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan), which covers the four community subareas in the southeast San Fernando Valley area, is the land use element of the General Plan applicable to the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area. The Community Plan implements the Framework Element and includes land use designations, density limits, building heights, and other provisions to implement the development that supports the City's policies and development vision for the future.

As shown on **Figure IV.J-1***, General Plan Land Use Designations*, the Community Plan designates the Project Site's land use as "Open Space," reflecting the long-term use of the Project Site for tennis and golf activities. The Community Plan also identifies the Project Site as a "major development opportunity site."[5]

[5] City of Los Angeles Department of City Planning, *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan*, 1998, page I-6.



SOURCE: Los Angeles Department of City Planning, Apr 21, 2021; ESA, 2021.

Harvard-Westlake River Park Project

Figure IV.J-1
General Plan Land Use Designations

The Community Plan specifically identifies issues related to the Project Site, as well as environmental concerns related to the availability of open space, parks, and use of and access to the Los Angeles River. Community Plan issues specific to the Project Site are as follows:

- Possible future alternative development of the site compatible with the surrounding area.
- Lack of public funding to convert the site to a public park.

The Community Plan further identifies opportunities related to the Project Site. These are as follows:

- Establish the proper zoning for the property that is consistent with surrounding development.
- Consider the site as a key access site for the future development of the Los Angeles River.
- Consider design features that encourage waterfront access to the Los Angeles River.[6]

Regarding open space, the Community Plan states that "important open space areas do exist separate from land under control of the City of Los Angeles Department of Recreation and Parks. Open space is important due to its role in both physical and environmental protection. There are two classifications for Open Space, publicly owned and privately owned open space."[7]

(b) City of Los Angeles Municipal Code

All development activity on the Project site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation. **Figure IV.J-2**, *Zoning,* shows the generalized zoning for the Project Site and vicinity, as well as the specific zoning designation of the Project Site. As shown in Figure IV.J-2, the Project Site is zoned A1-1XL-RIO. Pursuant to LAMC Section 12.05 A, the A1 (Agricultural Zone) permits one-family dwellings; parks, playgrounds, or community centers; golf courses; and farming, nurseries, aviaries, and apiaries. Additionally, LAMC Section 12.24 permits the operation of school uses in the A1 zone through approval of a conditional use permit. The "1XL" designation indicates a height restriction of 30 feet and a floor area ratio (FAR) of 3:1. The "RIO" designation indicates a River Improvement Overlay (RIO) District related to the Project's location in proximity to the Los Angeles River.[8] Also, due to the adjacency of the Project Site to the river, the Project Site is located within the Inner Core of the RIO District.

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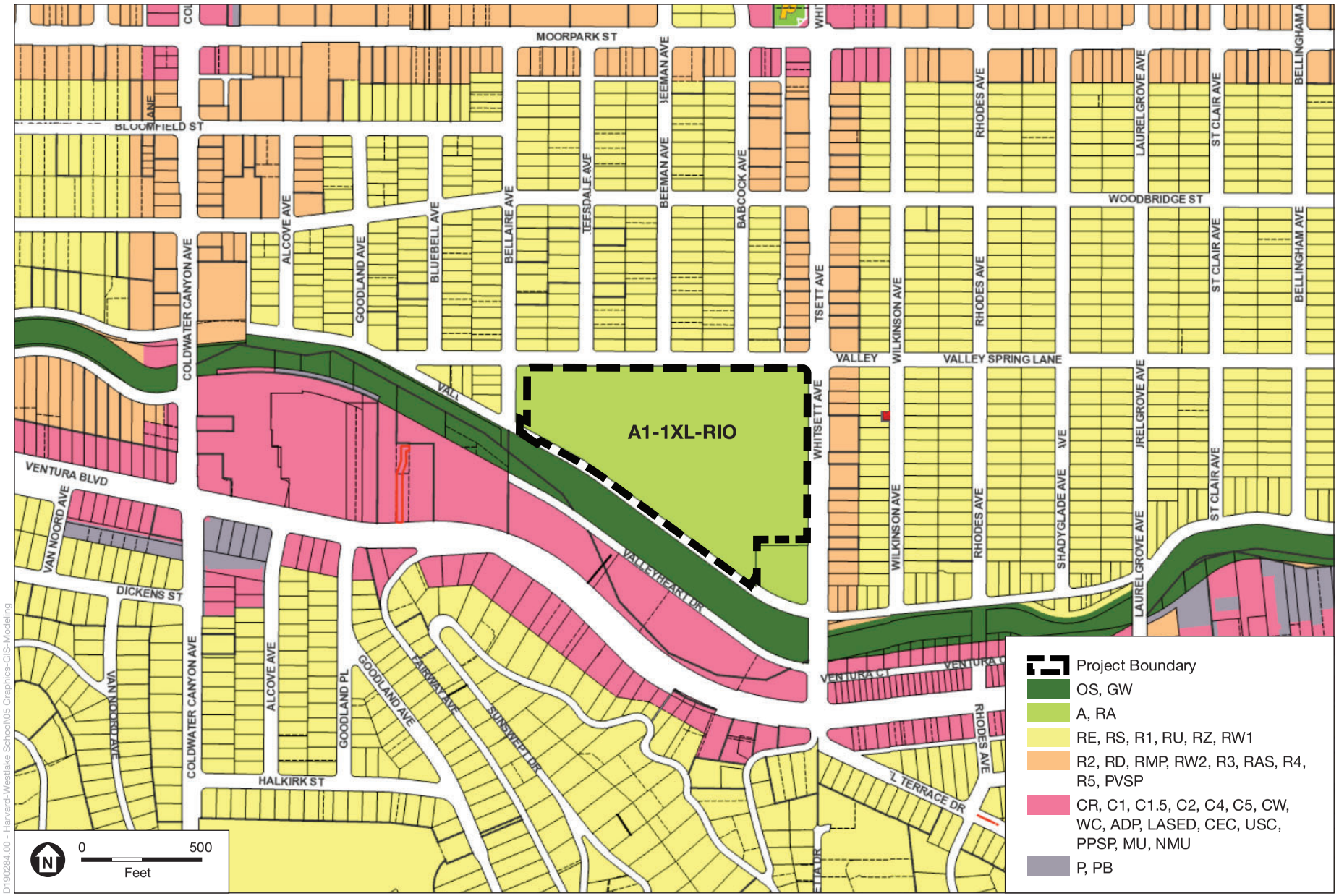
6 City of Los Angeles Department of City Planning, *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan*, 1998, page III-1.

7 City of Los Angeles Department of City Planning, *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan*, 1998, page III-12.

8 Zoning Information (ZI 2358), RIO Improvement Overlay District.



D190284.00 - Harvard-Westlake School\05 Graphics-GIS-Modeling

SOURCE: ZIMAS, 2020

Harvard-Westlake River Park Project

Figure IV.J-2
Zoning

(c) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines such as those found in Community Design Overlays.

(d) Plan Overlays

An overlay is an additional layer of planning control applied to properties in a clearly defined geographic area. Overlays function as tailored zoning districts, each with its own specialized set of regulations. Overlays implement the City's General Plan and Community Plans through neighborhood-specific policy objectives, supplementing the underlying base zoning. Projects located in an overlay must demonstrate compliance with all applicable regulations.

(i) River Improvement Overlay (RIO)

Effectuated by Ordinance No. 183,145 in August 2014, the River Improvement Overlay (RIO) District enables the City of Los Angeles to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City's boundaries. The RIO District is a proposed special use district that requires new development projects to follow and implement applicable development regulations and design guidelines. The purposes of the RIO District are to support the goals of the Los Angeles River Revitalization Master Plan (LARRMP); contribute to the environmental and ecological health of the City's watersheds; provide native habitat and support local species; establish a positive interface between the Los Angeles River and adjacent properties; promote pedestrian, bicycle and other multi-modal connections between the river and surrounding neighborhoods; provide an aesthetically pleasing environment; provide safe, convenient access to and along the river; promote river identity; and support the City's stormwater ordinances and programs.

The Project Site is located within the RIO inner core and, as codified in LAMC Section 13.17, regulations applicable to the Project Site include the following:

1. Landscaping shall conform to the following regulations: 75 percent of any Project's newly landscaped area shall be planted with any combination of the following: native trees, plants and shrubs, or species defined as Watershed Wise, or species listed in the Los Angeles County River Master Plan Landscaping Guidelines and Plant Palettes. This requirement is for new landscaping only and does not apply to existing landscaping.
2. Screening/Fencing.
    a. Loading areas and off-street parking facilities of three spaces or more, either on a surface lot or in a structure, shall be screened from the abutting public right-of-way and the River. However, such screening shall not obstruct the view of a driver entering or leaving the loading area or parking facility, or the view from the street of entrances and exits to a loading area or parking facility, and shall consist of one or a combination of the following:
        i. A strip at least 5 feet in width of densely planted shrubs or trees which are at least 2 feet high at the time of planting and are of a type that may be expected to form, within three years after time of planting, a continuous, unbroken, year round visual screen; or
        ii. A wall, barrier or fence of uniform appearance. Such wall, barrier or fence may be opaque or perforated, provided that not more than 50 percent of the face is open. The wall, barrier or fence shall, when located in either the rear or side yards, be at least 4 feet and not more than 6 feet in height.
    b. Electrical transformers, mechanical equipment, water meters and other equipment shall be screened from public view. The screening may be opaque or perforated, provided that not more than 50 percent of the face is open. The screen shall be at least 6 inches taller than the equipment and not more than 2 feet taller than the equipment.
    c. Exterior trash enclosures shall:
        i. be designed to complement the primary building with a wall height that exceeds the disposal unit it is designed to contain by at least 18 inches;
        ii. have a solid roof to deter birds and block views from adjacent properties;
        iii. not be constructed of chain link or wood.
3. Exterior Site Lighting.
    a. All site and building mounted lighting shall be designed such that it produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the site. No more than 5.0 percent of the total initial

designed lumens shall be emitted at an angle of 90 degrees or higher from nadir (straight down).

b. All low pressure sodium, high pressure sodium, metal halide, fluorescent, quartz, incandescent greater than 60 watts, mercury vapor, and halogen fixtures shall be fully shielded in such a manner as to not exceed the limitations in Subdivision 3(a), above.

(e) Los Angeles River Revitalization Master Plan

The purpose of the LARRMP, adopted by the City in April 2007, is to improve the quality of the Los Angeles River and to use the river as an environmental resource for the community through which it passes. The intention of the revitalization is to enhance flood storage, water quality, and safe public access. The broader goals of the LARRMP are to green the neighborhoods by connecting neighborhoods, incorporating public art, and extending open space and recreational and water quality features. Goals are also to capture community opportunities and to create value. The LARRMP would capture opportunities by making the river a focus of activity, foster civic pride, and provide new educational and public facilities. The LAARMP would create value by improving quality of life; increasing employment, housing, and commercial opportunities; and focus on improving underused and disadvantaged areas.[9]

b) Existing Conditions

(1) Project Site

The 17.2-acre Project Site (collectively including the Property and Leased Property, as defined in Chapter II, *Project Description*, of this Draft EIR) is located just to the north of the Los Angeles River. The Project Site is generally bounded by Bellaire Avenue to the west, Valley Spring Lane to the north, the Los Angeles River and Valleyheart Drive to the south, Whitsett Avenue to the east, and LAFD Fire Station 78 to the southeast.

Existing on-site facilities include the 2,700-square-foot clubhouse with a 10-seat café, a 799-square-foot tennis shack, and 16 tennis courts with approximately 128 court lights that reach a height of 22 feet. Two modular, metal sheds are located to the south of the tennis courts and are used to store maintenance supplies and tools. A nine-hole, 27-par golf course comprising approximately 426,000 square feet, a 25-stall driving range with a 2,300-square-foot golf canopy, and a putting green are also located on the Project Site. The driving range features net fencing, reaching a maximum height along certain sections of approximately 100 feet. Existing facilities also include 89 surface parking spaces.

The hours of daily operation for Weddington Golf & Tennis are from 7:00 a.m. to sunset daily for golf, 7:00 a.m. to 11:00 p.m. daily for the driving range, and 7:00 a.m. to 10:00 p.m. daily for the tennis courts. Lights for the driving range (six golf ball–shaped light standards , plus four floodlights mounted on the range canopy) and tennis courts (128

9 City of Angeles, Los Angeles River Revitalization Master Plan, April 2007.

lights) are turned on, daily, at sunset and remain on for up to 30 minutes following the closing of the driving range and tennis courts in order to allow for cleaning and maintenance at the end of the day. During 2019, lights were in use for approximately 1,600 hours and 2,000 hours for the tennis courts and driving range, respectively.

Existing facilities, including tennis courts and golf course, are illustrated in Figure II-3, Existing Project Site, in Chapter II, *Project Description*, of this Draft EIR. With the exception of the existing clubhouse, golf ball-shaped light standards, putting green and low brick retaining wall along the northeastern edge of the Property, existing structures/facilities, such as the tennis shack, tennis courts, court lighting, driving range features, golf course features, certain areas of landscaped open space, and paved areas would be demolished. The topography of the tennis courts, surface parking areas, driving range, and clubhouse is generally flat, while the topography of the golf course varies slightly with the various golf course features, including small mounds scattered throughout the golf course.

Much of the Project Site along Valley Spring Lane and Bellaire Avenue is bordered by a six-foot-tall chain link fence and mature trees, with approximately one foot of separation between the curbline and the chain link fence. The Tree Report prepared for the Project evaluated a total of 421 trees, located both on the Project Site and off-site surrounding areas. Of the 421 trees inventoried and evaluated, 258 trees are located on-site (which includes the Property and Leased Property) and 163 trees are located off-site, in the public right-of-way surrounding the Project Site and in the Zev Greenway.[10] The off-site trees include 87 trees located in the public rights-of-way along Valleyheart Drive, Bellaire Avenue, Valley Spring Lane, and Whitsett Avenue; and, 76 trees located in the off-site Zev Greenway area. As discussed in Section IV.C, *Biological Resources*, the Project Site (Property and Leased Property) and the off-site improvement areas comprise the Biological Study Area. The inventoried trees are generally concentrated along the western and northern boundaries of the Project Site and along the Los Angeles River, as well as scattered throughout the golf course. Non-protected tree species vary and include cedar, olive, palm, pine, and gum trees, among others. Fan palms (174), Aleppo pine (56) and blue gum eucalyptus (42) make up more than half of all the 421 inventoried trees. There are no species of trees considered protected by the City located on the Project Site. The lone significant, protected, off-site tree, a coast live oak, is located in the Zev Greenway and would be preserved by the Project.

The Project Site has operated as a recreational facility and golf course since 1956. The Weddington Golf & Tennis parcel was purchased by the Harvard-Westlake School (School) in December 2017, and the School has continued to operate it for golf and tennis uses. The School's uses, following the acquisition, have consisted of tennis team practices and tournaments on a portion of the tennis courts and occasional use of the driving range

[10] Carlberg Associates, Inc., City of Los Angeles Tree Report Harvard-Westlake Campus, October 2020. Included as an appendix to the Biological Resources Technical Report, which is included in Appendix D of this Draft EIR.

and golf course by the School's golf teams and summer camp. Reconfiguration of three golf course holes took place in October 2018 in order to accommodate the installation of additional netting by the Los Angeles County Flood Control District along most of the southern length of the Leased Property. Such netting, reaching a height of 30 feet in certain sections, was necessary following the reopening of the Zev Greenway in 2017 and the need to protect pedestrians in that area from being struck by errant golf balls.

(2) Surrounding Uses

The Project Site is adjacent to residential neighborhoods to the north, east, and west. These include multi-family neighborhoods in the R3 zone along the east side of Whitsett Avenue directly east of the Project Site and along both the east and west sides of Whitsett Avenue to the north of Valley Spring Lane. Single-family residential neighborhoods in the R1 zone are located to the north of Valley Spring Lane. Along the north side of Valley Spring Lane, single-family homes are oriented along (facing) the streets intersecting with Valley Spring Lane, including Babcock Avenue, Beeman Avenue, Teesdale Avenue, and Bellaire Avenue, and, therefore, do not directly face the Project Site along Valley Spring Lane (though the Project Site may be visible from certain vantage points). Two single-family homes in the R1 zone are located to the west of the Project Site on Bellaire Avenue, facing Bellaire Avenue and the Project Site. The surrounding residential neighborhoods are developed, with residential neighborhoods continuing north to the nearest commercial uses along Moorpark Avenue, 0.25 mile north of the Project Site. Adjoining the southeastern corner of the Project Site, LAFD Fire Station 78 is located at the west side of Whitsett Avenue, at the intersection of Whitsett Avenue and Valleyheart Drive.

To the south, the Project Site adjoins the Zev Greenway, the longest river greenway in the San Fernando Valley, which follows the north side of the Los Angeles River for 0.5 mile between Whitsett Avenue on the east and Coldwater Canyon Avenue on the west.[11] It is also part of the Los Angeles River Greenway, which connects various communities along the river edge, including Los Feliz, Silver Lake, Elysian Valley, and Downtown Los Angeles. The Los Angeles River Greenway trail is a publicly-accessible paved/unpaved trail for pedestrians and bicyclists. There is an entry gate to the Zev Greenway south of Valleyheart Drive near the southeastern corner of the Project Site.

The channelized Los Angeles River is located to the south of the Zev Greenway. The area along the southern edge of the river is improved with a bicycle path. Commercial uses in the C1.5-IVL-RIO zone are located to the south of the river and oriented to (facing) Ventura Boulevard, 0.1 mile south of the Project Site. The C1.5 zone (Limited Commercial) allows retail, theater, hotel, parks, playgrounds, and medium density multi-family residences. The Project vicinity is highly urbanized and generally built out. The north side of Ventura Boulevard directly to the south of the Project Site is developed with retail uses. These uses are served by large surface parking lots, including parking areas

[11] The Planning Report, Zen Yaroslavsky LA River Greenway Trail: The Valley's 'Missing Link', October 30, 2014, https://www.planningreport.com/2014/10/30/zev-yaroslavsky-la-river-greenway-trail-valleys-missing-link, accessed July 2, 2020.

between the commercial buildings and the Los Angeles River. Retail and office uses are also located along the south side of Ventura Boulevard, and because Ventura Boulevard is located at the edge of the rising Santa Monica Mountains, residential neighborhoods in the hillside areas begin immediately to the south of this commercial strip.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to land use and planning if it would:

Threshold (a): Physically divide an established community; or

Threshold (b): Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

For this analysis, the Appendix G thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions. The factors used to evaluate land use impacts are listed below.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate land use and planning impacts:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the adopted designation of the General Plan and Community Plan, and
- Whether the proposal is inconsistent with other adopted environmental goals or policies contained in other applicable plans.

b) Methodology

The analysis of potential land use impacts considers the Project's potential inconsistency with applicable plans, policies, and regulations, adopted for the purpose of avoiding or mitigating an environmental effect.

(1) Physically Divide a Community

The intent of the analysis is to determine whether existing communities or land uses would be disrupted, divided, or isolated by the Project, with consideration given to the duration of any disruptions. The analysis is based on aerial photographs, mapping and field surveys, in which surrounding uses were identified and characterized. The analysis addresses general land use relationships and urban form based on a comparison of

existing land use relationships in the vicinity of the Project Site under existing conditions, at the time the Notice of Preparation was issued, to the conditions that would occur with Project implementation.

(2) Conflict with Applicable Goals, Objectives, and Policies Adopted for the Purpose of Avoiding or Mitigating an Environmental Impact

The analysis of potential land use impacts considers consistency of the Project with adopted plans, regulations, and development guidelines, and in some instances advisory guidance, that are applicable to the Project Site and the Project and that have been adopted for the purpose of avoiding or mitigating an environmental effect.

CEQA Guidelines Section 15125(d) requires that in describing the environmental setting, an EIR include a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Separately, Appendix G recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Importantly, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2 "an EIR shall identify and focus on the significant effects of the proposed project on the environment." An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> *"An inconsistency between a proposed project an applicable plan is a legal determination not a physical impact on the environment. …if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor."*

Under State Planning and Zoning law (Government Code Section 65000 et seq.), strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests, and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

Project consistency with applicable policies that have in part been adopted for the purpose of avoiding or mitigating an environmental effect as set forth in SCAG's 2020-

2045 RTP/SCS, the Framework Element, and Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, is evaluated in detail in Appendix J*, Land Use Plans and Policies: Project Consistency Tables*, of this Draft EIR. The results and determination of whether the Project would cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect is provided in the impact analysis below. To the extent that the Project's potential conflict with a plan, program or policy is analyzed in another section of this Draft EIR, that plan is not further discussed in this Land Use Section. For example, consistency with transportation plans is analyzed in Section IV.M, *Transportation.*

c) Project Design Features

There are no Project Design Features that relate to land use and planning.

d) Analysis of Project Impacts

Threshold (a): Would the Project physically divide an established community?

As discussed in the Initial Study (Appendix A of this Draft EIR), the Project would not physically divide an established community and, therefore, a less-than-significant impact would occur with respect to Threshold (a). No further analysis is required.

Threshold (b): Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

(1) Impact Analysis

As discussed above, various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the goals, objectives, and policies with SCAG's 2020-2045 RTP/SCS, the City's General Plan Framework Element, the General Plan Conservation Element, the General Plan Open Space Element, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, the LAMC, and the Los Angeles River Improvement Overlay District Ordinance, and the Los Angeles River Revitalization Master Plan.

Other plans that address the distribution of land use in the region and that are linked with the SCAG Plans are addressed in other sections of this Draft EIR. Specifically, as described above, Project consistency with the AQMP is analyzed in Section IV.B, *Air Quality,* and Senate Bill (SB) 375 and SCAG's Sustainable Communities Strategy are discussed in Section IV.G, *Greenhouse Gas Emissions*, of this Draft EIR.

(a) 2020–2045 RTP/SCS

SCAG's 2020–2045 RTP/SCS incorporates several goals that are applicable to the Project and that would avoid or reduce the Project's environmental impacts. As shown in **Table LU-1**, *Consistency of the Project with Applicable Strategies of the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy Intended to Avoid or Mitigate an Environmental Effect*, provided in Appendix J of this Draft EIR, the Project would not conflict with applicable strategies of the 2020-2045 RTP/SCS. As described in Table LU-1, the goals of the 2020-2045 RTP/SCS are focused on priorities, such as promoting land use and growth patterns that facilitate transit use and active transportation (e.g., bicycling and walking), thus, reducing VMT and increasing energy efficiency. The Project would be located 0.1 mile from the Ventura Boulevard transit corridor, which provides 15-minute bus rapid transit (BRT) service during peak hours and, as such, is defined as an HQTA area. The Project would not conflict with the strategy of the 2020-2045 RTP/SCS to focus development within an HQTA and would encourage pedestrian and bicycle access through the provision of new recreational opportunities on the Project Site that would serve the immediate neighborhood and vicinity, including 5.4 acres of landscaped trails, bicycle parking, new ADA-friendly access to the Zev Greenway (a section of the Los Angeles River Greenway), and installation of the off-site Coldwater Canyon Avenue Riverwalk Path Ramp accessing the Zev Greenway. Thus, the Project would not conflict with this 2020-2045 RTP/SCS strategy to reduce automobile vehicle miles, reduce air emissions, and improve public health through locating new development within an HQTA.

The Project would provide a public benefit through the community use of landscaped pedestrian paths, community access to the Zev Greenway, and community use of on-site recreational facilities when not in use by the School. As such, it would not conflict with the strategies of the 2020-2045 RTP/SCS to promote the redevelopment of underperforming, outmoded nonresidential uses, to prioritize infill and redevelopment of underutilized land, to increase amenities and connectivity in an existing neighborhood. As such, the Project would not conflict with 2020-2045 RTP/SCS strategies to improve access to public park space. As an infill use, the Project would not result in urban sprawl or other effects that would conflict with the objectives of the 2020-2045 RTP/SCS to reduce vehicle miles and improve air quality.

Through improved collection of stormwater flowing to the Los Angeles River, primarily through the Project's 1 million-gallon collection system that would filter, retain, and reuse stormwater and other urban runoff, the Project would not conflict with 2020-2045 RTP/SCS strategies to support community resiliency to natural hazards, such as flooding. The Project would reduce the number of single-occupancy vehicle trips and, therefore, would not conflict with 2020-2045 RTP/SCS strategies to encourage design and transportation options that reduce the reliance on and number of solo car trips. The Project would reduce reliance on electricity through a range of sustainability features, and, therefore, would not conflict with 2020-2045 RTP/SCS conservation strategies. In addition, the Project's program to plant native trees and shrubs would enhance foraging

opportunities and habitat for urban-adapted wildlife in this area, and support migratory bird corridors and, therefore, would not conflict with the 2020-2045 RTP/SCS strategies to preserve, enhance and restore regional wildlife connectivity.

Based on the above, and as further described in Appendix J of this Draft EIR, because the Project would not conflict with applicable goals of SCAG's 2020–2045 RTP/SCS, adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to the 2020-2045 RTP/SCS would be less than significant.

(b) City of Los Angeles General Plan Framework Element

The Framework Element sets forth environmental policies related to land use, conservation, open space, and public facilities that would mitigate or avoid environmental effects and which are relevant to the Project. As shown in **Table LU-2**, *Comparison of the Project to Applicable Goals, Objectives and Policies of the General Plan Framework Element Intended to Avoid or Mitigate an Environmental Effect*, in Appendix J of this Draft EIR, the Project would not conflict with such related, applicable goals of the Framework Element. The Project would increase recreational opportunities and landscaped open space in the Studio City community, in an area in which parks and open space uses are currently in short supply. The RAP's 2009 Citywide Community Needs Assessment cites walking and biking trails as the No. 1 priority and small neighborhood parks and the No. 2 priority.[12]

With the location of this use within an existing developed area with adjacent residential uses and in proximity to BRT service and other transit, the Project Site would be accessible by walking, transit, and bicycle, and, therefore, the location would help reduce vehicle trips, VMT, and air pollution. As such, it would not conflict with objectives of the Framework Element to reduce vehicle trips, VMT, and air pollution.

The Project would facilitate pedestrian access to the Greenway trail through a new direct connection to the Project Site from its publicly-accessible landscaped pathways, and from the off-site Coldwater Canyon Avenue Riverwalk Path Ramp accessing the Zev Greenway. The Project would also facilitate bicycle access and provide on-site bicycle parking and, as such, would not conflict with Framework Element policies to provide for the development of land use patterns that emphasize pedestrian and bicycle access. The Project would comprise a primarily recreational and open-space use on an existing, non-residential property. With the landscaped, open character of the Project, the Project would not conflict with Framework Element objectives to provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods.

[12] City of Los Angeles Department of Recreation and Parks, 2009 Citywide Community Needs Assessment Final, page 53.

The Project would improve safety and surveillance by providing lighting along pathways, around the proposed gymnasium building, in the surface parking area, and in entrance areas for security and wayfinding purposes. It would also include an at-grade security kiosk near the tennis courts and clubhouse, a second security kiosk in the underground parking structure, a third security kiosk near the vehicular roundabout accessed from Valleyheart Drive, and 24-hour, on-site security provided seven days a week. Neighborhood and off-site parking for the Project would be prohibited and enforced through stationing of security personnel at the pedestrian entrance on Whitsett Avenue to screen visitors for neighborhood parking and to return visitors to their car if inappropriately parked, and through periodic patrols of the neighborhood. Such security measures would reduce impacts on public services such as LAPD services. With the implementation of these features, the Project would not conflict with Urban Form and Neighborhood Design Chapter Policies of the Framework Element to facilitate observation and natural surveillance through improved development standards.

The Project would remove and replace invasive palms (i.e., the Mexican fan palm) with RIO-compliant trees. All other removed non-native trees would be replaced at a minimum 2:1 ratio with RIO-compliant trees. The Project would also provide publicly-accessible open space areas. Thus, the Project would contribute to the Los Angeles River's natural setting and the sustainability of the region and would not conflict with policies of the Framework Element to protect the City's natural settings from the encroachment of urban development and to conserve open space resources. The Project would contribute to the City's stormwater management system by capturing and treating surface water runoff at Whitsett Avenue, upstream from the Project Site, as well as throughout the approximately 17-acre Project Site. The management of currently uncontrolled surface flow from the collection location on Whitsett Avenue would reduce potential flooding, as well as improve water quality flowing into the Los Angeles River, Thus, the Project would not conflict with goals of the Framework Element to manage stormwater, minimize flood hazards, and protect water quality.

Based on the above, and as further described in Appendix J of this Draft EIR, because the Project would not conflict with applicable objectives and policies of the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to the Framework Element would be less than significant.

(c) City of Los Angeles Open Space Element of the General Plan

The Open Space Element sets forth environmental policies related to conservation, open space, and public facilities that are relevant to the Project. As shown in **Table LU-3**, *Comparison of the Project to Applicable Goals, Objectives, and Policies of the Open Space Element of the General Plan Intended to Avoid or Mitigate an Environmental Effect*, provided in Appendix J of this Draft EIR, the Project would not conflict with related, applicable goals of the Open Space Element.

The Project, which would incorporate 5.4 acres of publicly-accessible, landscaped open space on a property with no current public access, would not conflict with goals and policies of the Open Space Element to ensure the preservation and conservation of sufficient open space to serve the recreational, environmental, health and safety needs of the City. The Project would increase public-access to open space and recreational facilities and would therefore contribute to the recreational, health, and safety needs of the City. As further described in Section IV.D, *Cultural Resources*, of this Draft EIR, the Project would retain all of the designated character-defining features of the Historical-Cultural Monument (HCM), Studio City Golf and Tennis Club, and it includes Project Design Features to ensure the significance of the HCM is retained, specifically PDF-CUL-1, Rehabilitation Plan, PDF-CUL-2, Documentation, and PDF-CUL-3, Interpretation. As discussed in Chapter II, *Project Description*, and Section IV.D, *Cultural Resources*, the character defining features to be retained include the distinctive materials, features, spaces, and spatial relationships that characterize the exterior of the Weddington Golf & Tennis clubhouse. Thus, in addition to the clubhouse, these features include the putting green, brick wall with weeping mortar around the putting green, and the six golf ball-shaped light standards on the Project which would be retained and relocated to the northeastern portion of the Property, in proximity to the clubhouse and putting green. Following their relocation on the Project Site, the golf ball-shaped light standards would remain visible from the public right-of-way. By retaining all of the on-site designated character-defining features, the Project would not substantially conflict with the goals and policies of the Open Space Element to conserve cultural and appropriate historical monuments.

With respect to the goals and policies of the Open Space Element to conserve and/or preserve those open space areas containing the City's environmental resources, including air and water, the existing tennis courts and landscaped golf course within the Project Site constitute open space. With the provision of open space trails under the Project and implementation of an extensive landscaping program, including the replacement of invasive and ornamental tree species with RIO District-compliant, native trees; a net increase of approximately 153 trees; and, substantial areas with new native and RIO District-compliant landscaping, the Project would conserve and expand the open space character and environmental resources on the Project Site. In addition, the Project's stormwater collection system would collect, filter, and store stormwater runoff from Whitsett Avenue and on-site sheet flow that would, otherwise, flow polluted and untreated into the Los Angeles River (including the carrying of substantial amounts of pesticides, fertilizers, and fungicides currently required to maintain the golf course playing surfaces). As such, the Project would reduce surface water runoff and siltation during high storm events and improve the quality of water reaching the river. As such, the Project would not conflict with the goal of the Open Space Element to conserve open space areas and the City's water resources.

Based on the above, and as further described in Appendix J of this Draft EIR, because the Project would not conflict with applicable objectives and policies of the Open Space Element adopted to avoid or mitigate an environmental effect, impacts with respect to the Open Space Element would be less than significant.

(d) City of Los Angeles Conservation Element of the General Plan

The Conservation Element sets forth environmental policies that would mitigate or avoid environmental effects and which are relevant to the Project. As shown in **Table LU-4**, *Comparison of the Project to Applicable Goals, Objectives, and Policies of the Conservation Element of the General Plan Intended to Avoid or Mitigate an Environmental Effect*, in Appendix J of this Draft EIR, the Project would not conflict with such related, applicable goals of the Conservation Element.

The Project, which would implement the City's standard condition of approval to address inadvertent discovery of archaeological and paleontological resources, would not conflict with the Conservation Element's archaeological and paleontological resources objective to protect such resources. The Project would collect and filter surface water runoff to reduce the potential for siltation and erosion in the vicinity of the Los Angeles River and, as such, would not conflict with the objective of the Conservation Element to protect the watershed from erosion and inappropriate sedimentation. In addition, the Project would remove 240 trees, of which 179 are non-native, non-RIO District-compliant trees. These would be replaced with 393 RIO District-compliant trees, resulting in a net increase of approximately 153 trees. The Project would also include other native plant species and natural habitat that would support the healthy propagation and survival of native species that may exist along the Zev Greenway or within the Project Site. Because the Project would support native plant species, it would not conflict with the objective of the Conservation Element to address the preservation, protection, restoration, and enhancement of the natural plant and wildlife diversity, habitats, bird migratory corridors and linkages.

Based on the above, and as further described in Appendix J of this Draft EIR, because the Project would not conflict with applicable objectives and policies of the Conservation Element adopted to avoid or mitigate an environmental effect, impacts with respect to the Conservation Element would be less than significant.

(e) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan

The Community Plan sets forth environmental issues and policies related to the availability of open space, parks, and use of and access to the Los Angeles River. As shown in **Table LU-5**, *Comparison of the Project with Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Intended to Avoid or Mitigate an Environmental Effect,* provided in Appendix J of this Draft EIR, the Project would not conflict with related, applicable goals of the Community Plan.

The Project Site is identified in the Community Plan as a "key site" that would provide access to the Los Angeles River for recreational purposes. The Community Plan also

states that the community is "deficient in the number of neighborhood parks."[13] Issues identified by the Community Plan include the need for recreational uses that would not encroach into residential neighborhoods and that would expand the Community Plan area's parks and recreational opportunities. The Project would offer conveniently accessible landscaped, open space pathways for the public and would accommodate public use of the tennis courts, fields, gymnasium facilities, and pool when not being used by the School. With these park areas and facilities available to the public, the Project would increase public recreational opportunities on a currently privately-owned tennis and golf site, while not encroaching into the existing, surrounding residential neighborhood. The Project would increase the Project Site's total trees and provide permanent open space to the community, in contrast to the current site, which provides no such publicly-accessible park space, as well as a heavily landscaped interface between the Project Site and the adjacent residential neighborhood.

The Community Plan also identifies lack of public funding to convert the Project Site to a public park. The Project would not conflict with this issue since the Project would fund the public, open space uses and its own recreational facilities.

Goal 4 of the Community Plan is to provide adequate recreational and parks facilities to meet the needs of the area's residents, and Policy 4-1.2 is to increase accessibility to the Los Angeles River. The Project would not conflict with the goal or related policies since it would expand the community's options for recreation and park space and would provide a landscaped pathway to the Zev Greenway (a section of the Los Angeles River Greenway), as well as provide an off-site ADA-compliant Coldwater Canyon Avenue Riverwalk Path Ramp accessing the Zev Greenway.

The Project would also meet the applicable action requirements of the Community Plan under the following Goal 5: "A community with sufficient open space in balance with development to serve the recreational, environmental, and health needs of the community and to protect environmental and aesthetic resources." The Project would provide pathway, parking lot, and other exterior lighting, as well as seven-day on-site security personnel, CCTV cameras, and patrols and, as such, would not conflict with the requirements of Actions 3 and 5 to maintain adequate illumination of public spaces and enforcement of codes restricting illegal activity. Access to the Project Site would be closed after the Project's hours of use.

As discussed in Section IV.A, *Aesthetics*, of this Draft EIR, the Project would not conflict with the light and glare policies of the Community Plan to (1) install on-site lighting along all pedestrian walkways and vehicular access ways and (2) to shield and direct on-site lighting onto driveways and walkways, away from adjacent residential uses. Lighting would be provided along pathways, around the proposed gymnasium building, in the surface parking area, and in entrance areas for security and wayfinding purposes. All

[13] City of Los Angeles Department of City Planning, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, 1998, page II-12.

lighting, including field lights, would be shielded and directed onto the use being illuminated and away from adjacent residential uses. Spillover lighting from the Project at neighboring residences would be well below applicable thresholds (see the lighting analysis in Section IV.A, *Aesthetics*, of this Draft EIR.). The Project would also not conflict with public open space policies of the Community Plan to consider the siting of open space to maximize pedestrian accessibility and circulation, provide for solar exposure or protection, locate open space adjacent to pedestrian routes and other open spaces, and provide appropriate plant and hard scape materials. In relation to these policies, the Project would maximize the use of open space to accommodate pedestrian accessibility and circulation. The primary pedestrian/bicycle entrance to the Project Site would be provided off Whitsett Avenue near the northern vehicle entrance driveway. An additional pedestrian entrance gate would be located along Whitsett Avenue at the southern Project Site boundary, just north of LAFD Fire Station 78. Six additional exterior pedestrian entrance gates would be located along the Project Site perimeter. In total, there would be eight pedestrian entry gates along the perimeter of the Project Site that would provide access to the three-quarter mile path and 5.4 acres of publicly-accessible open space and landscaped trails connecting to the adjacent Zev Greenway and on-site landscaped areas, water features, and recreational facilities. With the tennis courts, the amount of publicly-accessible area is approximately 7 acres. Access to the interior of the Project Site and its recreational facilities would only be via the primary pedestrian entrance on Whitsett Avenue, south of the clubhouse. Attempted entry at points other than the designated pathways would be prevented by 3-foot tall metal fencing and substantial, dense landscaping. The Project's publicly-accessible open space and tennis courts (when not use by the School) would be open to the public from 7:00 to 9:00 p.m. daily. The Project also proposes new pedestrian access ramps between the Project Site and the Zev Greenway, as well as between Coldwater Canyon Avenue and the Zev Greenway. Both of the pedestrian ramps would be ADA-accessible. In addition, the Project would result in a net increase of approximately 153 trees beyond existing conditions (including the addition of 393 native or RIO District-approved trees, which would provide solar protection or solar exposure during the cooler, winter season, and diminish invasive tree species while increasing native tree species.

Based on the above, and as further described in Appendix J of this Draft EIR, because the Project would not conflict with applicable objectives and policies of the Community Plan adopted to avoid or mitigate an environmental effect, impacts with respect to the Community Plan would be less than significant

(f) Los Angeles River Revitalization Master Plan

The purpose of the Los Angeles River Revitalization Master Plan is to improve the quality of the Los Angeles River and to use the river as an environmental resource for the community through which it passes. The Project would be consistent with the objectives of the Los Angeles River Revitalization Master Plan. The Project, which would provide 5.4 acres of publicly-accessible open space and recreational uses, including landscaped trails and water features, seating, and use of tennis courts, pool, sports fields, and

gymnasium facilities, would be consistent with broad goals for the Los Angeles River Revitalization Plan to provide recreation and open space and new trails. The Project would implement a program to replace non-native or invasive trees and plants, and result in a net increase of approximately 153 trees (for a total of 574 trees on the Project Site, adjacent public right-of-way, and additions to the Zev Greenway). The proposed tree species would consist entirely of native trees and plants, the vast majority of which are also species sourced from the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes, and, as such, the Project would be consistent with policies of the Plan to provide native habitat and to support local species and wildlife.

The Project would collect, filter, and store stormwater runoff from within Whitsett Avenue and throughout the Project Site to reduce the existing volume of uncontrolled sheet flow and to improve the quality of drainage entering the Los Angeles River. As such, the Project would be consistent with the goal of the Revitalization Master Plan to enhance water quality, improve water resources, and improve the ecological functioning of the River.

The Project would provide direct public access to the Zev Greenway, a section of the Los Angeles River Greenway. Access, which does not currently exist from the Project Site, would connect to the Project's landscaped trails. The Project would also install a publicly-accessible Coldwater Canyon Avenue Riverwalk Path Ramp to the Zev Greenway at Coldwater Canyon Avenue, thus improving public access to the Zev Greenway for more community members than under existing conditions. As such, the Project would meet the objectives of the Revitalization Master Plan to provide for improved public access to the Los Angeles River and to foster a growth in community awareness of the Los Angeles River.

Based on the above, because the Project would not conflict with land use policies and regulations adopted by the Los Angeles River Revitalization Master Plan to avoid or mitigate environmental effects, impacts with respect to the Los Angeles River Revitalization Master Plan would be less than significant

(g) Los Angeles River Improvement Overlay District Ordinance

A stated purpose of the RIO District Ordinance is to support the goals of the Los Angeles River Revitalization Master Plan, which serves as a blueprint for implementing a variety of greening projects, including the development of channel modifications, ecological restoration, and revitalized riverfront communities in key opportunity areas. As shown in **Table LU-6**, *Comparison of the Project with Policies of the River Improvement Overlay Intended to Avoid or Mitigate an Environmental Effect*, provided in Appendix J of this Draft EIR, the Project would not conflict with applicable goals of this Ordinance. Through the RIO District Ordinance, the Los Angeles River Revitalization Master Plan intends to revitalize the general environment of the Los Angeles River by improving natural habitat, economic values, and water quality, as well as recreation, and open space amenities. The Project would provide publicly-accessible open space in proximity to the river, landscaped trails connecting to the adjacent Zev Greenway, as well as install an ADA-compliant accessible pedestrian ramp leading to the Zev Greenway at Coldwater Canyon

Avenue. The Zev Greenway, a section of the Los Angeles River Greenway, was developed to contribute to the vision of the Los Angeles River Revitalization Master Plan though, as currently developed, does not provide any pedestrian connectivity or access at its western terminus. In supporting the Zev Greenway, the Project would not conflict with the RIO District Ordinance.

The Project would not conflict with RIO District Ordinance policies to contribute to the environmental and ecological health of the City's watersheds and the Los Angeles River by reducing the volume of surface water runoff during storm events and improving the quality of surface water runoff into the Los Angeles River. The Project would design and construct a stormwater collection and treatment system to collect rainwater and other urban runoff at the corner of Whitsett Avenue and Valley Spring Lane, as well as throughout the Project Site and proposed building roofs, including through the use of flow-through planters and circulating water features within the 5.4 acres of publicly-accessible pathways and park areas. Additionally, the presence of pesticides and fertilizers in surface runoff associated with the existing golf course would be eliminated.

The Project would remove tree species not approved under the RIO District Ordinance and replant native species. The Project's proposed tree replacement program would result in a net increase in trees of 36 percent (153 trees) for a total of 574 trees on the Project Site, adjacent public right-of-way, and additions to the Zev Greenway. The Project would also install an array of thousands of landscape shrubs and plants consistent with the RIO District Ordinance requirements. The proposed tree and plant species would consist entirely of native trees, the vast majority of which are also species sourced from the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes, and as such, the Project would not conflict with policies of the RIO District Ordinance to provide native habitat and support local species.

The Project would use shuttle buses between the Harvard-Westlake Upper School Campus and the Project Site and provide pedestrian and bicycle access and bicycle parking, as well as improved access to the Zev Greenway through the installation of the ADA-compliant Coldwater Canyon Avenue Riverwalk Path Ramp accessing the Zev Greenway. As such, the Project would not conflict with RIO District Ordinance policies to promote pedestrian, bicycle and other multi-modal connection between the river and its surrounding neighborhoods.

By providing an off-site (within the Whitsett Avenue and Valley Spring Lane intersection) and on-site stormwater runoff collection system that would comply with the City's Low Impact Development (LID) Ordinance by reducing the rate of stormwater runoff and filtering improving water quality during storm events, the Project would not conflict with RIO District Ordinance policies to support the LID Ordinance and the City's Irrigation Guidelines.

The Project would not conflict with RIO District Ordinance requirements codified in LAMC Section 13.17 and LAMC Section 13.17 F.3(a) regarding landscaping and exterior site lighting. In compliance with the requirements of LAMC Section 13.17 F.3(a), all exterior

and building mounted lighting would be designed such that it produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the site boundary along the Zev Greenway, and no greater than 0.01 horizontal foot candles 15 feet beyond the site. (See lighting analysis in Section IV.A, *Aesthetics*, of this Draft EIR.) All fixtures proposed for the Project would be specifically designed with precise optics and integral shields to aid in controlling the light and preventing unwanted spill light, uplight, or glare. (See lighting analysis in Section IV.A, *Aesthetics*, of this Draft EIR.)

Based on the above, because the Project would not conflict with land policies and regulations adopted by the RIO District Ordinance to avoid or mitigate environmental effects, impacts with respect to RIO District Ordinance would be less than significant.

(h) Los Angeles Municipal Code

The Project would seek several zoning actions pertinent to the provisions of the LAMC, including the following:

- Pursuant to LAMC Section 12.24 T, a Vesting Conditional Use Permit to allow the operation of a private-school athletic and recreational campus in the A1 zone.
- Light Poles: Pursuant to LAMC Section 12.24 F, the following maximum heights for light poles ancillary to the athletic and recreational campus, in lieu of the 30-foot height limit otherwise required by LAMC Section 12.21.1 A.
  - Two 60-foot-tall light poles on the southeast and southwest sides of the pool facility.
  - Three 80-foot-tall light poles on the north side of Field B.
  - One 60-foot-tall light pole on the east side of Field B.
  - Two 60-foot-tall light poles on the south side of Field B.
  - One 70-foot-tall light pole on the south side of Field B.
  - Three 70-foot-tall light poles on the west sideline, and three 70-foot tall light poles on the east sideline, of Field A.
  - Twelve 40-foot-tall light poles located on all four sides of the proposed tennis courts.
- Walls/Fences: Pursuant to 12.24 F, the following maximum heights for walls and fences ancillary to the athletic and recreational campus, in lieu of the 8-foot maximum height limitation for fences and walls in side yards and the 6-foot maximum height limitation for fences and walls in front yards, in the A1-1XL-RIO zone.
  - A maximum 10-foot-height wall along Whitsett Avenue.
  - A maximum 11-foot-height wall along Valley Spring Lane and Bellaire Avenue.
- Pursuant to LAMC Section 16.05, a Site Plan Review since the Project would result in an increase of more than 50,000 square feet of non-residential floor area.

- Execution of a rental agreement with the Los Angeles County Flood Control District for use of the Leased Property.

In addition, Harvard-Westlake School will submit requests related to the Project, which may include approvals and permits from various City and County departments, including the Department of Building and Safety, the County Flood Control District, Bureau of Street Services (Urban Forestry Division) and other City and County municipal agencies for Project construction activities, including but not limited to demolition, haul route, excavation, shoring, grading, foundation, temporary street closure, and building and interior improvements and Department of Public Works approval for the removal of trees located on the public right-of-way. Harvard-Westlake School will also request a revocable permit to make certain improvements in the Valleyheart area. Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, Department of Public Works approval to remove non-protected trees from the Project Site, and sign permits.

The analysis throughout this Draft EIR includes an assessment of the Project as proposed with its contemplated athletic and recreational facilities, as well as associated infrastructure improvements. Notably, environmental impacts associated with the proposed lighting have been analyzed in Section IV. A, *Aesthetics*, of this Draft EIR. As discussed therein, light and glare impacts would be less than significant. All other operational lighting impacts would be less than significant.

Based on the above, the Project would be consistent with applicable regulations or provisions of the LAMC applicable to the Project Site. Therefore, the Project would not result in significant environmental impacts related to inconsistency with the LAMC's land use regulations. As such, impacts with respect to the land use provisions of the LAMC would be less than significant.

(i) Conclusion

Generally as analyzed above, the Project would be consistent with and not conflict with applicable policies related to the City's open space resources, protection of the water quality of the Los Angeles River, reduction of siltation and flooding, protection or restoration of native or other natural habitat, land use patterns that facilitate multimodal access, transportation options that reduce reliance on solo car trips, support of local policies for renewable energy, restoration of wildlife connectivity by providing native shrubs and trees, improved access to public park space, and other policies.

Specifically, the Project would not conflict with applicable environmental policies to avoid or mitigate environmental effects within SCAG's 2020-2045 RTP/SCS; the City's General Plan Framework Element, Conservation Element, and Open Space Element, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan; the Los Angeles River Revitalization Master Plan; the LAMC; and the RIO District Ordinance. Further, as discussed in Section IV.B, *Air Quality*, and Section IV.G, *Greenhouse Gas Emissions*, the Project would not conflict with applicable air quality and GHG plans and

policies adopted for the purpose of avoiding or mitigating environmental effects. Note that Mitigation Measure AQ-MM-1 is provided in Section IV.B to reduce construction emission impacts to levels that are less than significant in further compliance with the SCAWMD Air Quality Management Plan.

Approval of the Project's requested entitlements, including the Conditional Use Permit for the athletic and recreational use and variances for the field lights and peripheral walls, would bring the Project into consistency with the LAMC. **Therefore, with the approval of the requested entitlements, the Project would not conflict with applicable land use plans, policies, and regulations adopted to avoid or mitigate environmental effects. As such, land use impacts related to potential conflict with adopted plans and policies would be less than significant.**

(2) Mitigation Measures

Impacts regarding land use and planning were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding land use and planning would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, lists five related projects that are planned or are under construction within the Project area. All of the related projects are located on within a 0.5-mile section of Ventura Boulevard between 12544 and 12833 Ventura Boulevard. The related project sites are zoned C-1.5 (Limited Commercial) and are currently developed with commercial uses. The related projects would be commercial or mixed-use (commercial with apartments) and would be allowed in the Limited Commercial Zone, including multi-family housing consistent with the R4 zone. The related projects represent mixed-use, urban infill, and while they would increase density in the area, each related project would be evaluated for consistency with existing and proposed zoning and land use designations for given properties.

The related projects would provide housing and retail uses along Ventura Boulevard, located within a SCAG-defined HQTA, and, along with the Project's open space and recreational uses, would not conflict with the applicable plans and goals to concentrate new or higher density development within such areas. Therefore, based on the proposed uses for the related project and the Project, the related projects individually or in combination with the Project, would not conflict with policies of land use plans, adopted for the purpose of avoiding or mitigating an environmental effect. **Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative**

impacts with respect to conflict with plans and policies adopted to avoid or mitigate an environmental effect would be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding land use and planning were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding land use and planning would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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