

Appendix J
**Land Use Plans and Policies:
Project Consistency Tables**

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

Strategy	Would the Project Conflict?
Focus Growth Near Destinations and Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	No Conflict. The Project would promote bicycle and pedestrian activity through the provision of landscaped pedestrian trails, bicycle parking, trail access to the Zev Greenway (a section of the Los Angeles River Greenway), and installation of an Americans with Disabilities Act (ADA)-compliant off-site pedestrian access ramp to the Zev Greenway at Coldwater Canyon Avenue, thus, providing direct pedestrian access to the Zev Greenway where there currently is none. The Project would promote bicycle connectivity between the Project Site and to the existing bicycle path that follows the south side of the Los Angeles River. Bicycle access within the Project Site would promote bicycle use between the Project Site and the surrounding neighborhoods. The Project would use shuttle buses to transport students, employees, visitors, and spectators between the Harvard Westlake Upper School campus and the Project Site. The Project Site is also located within a High Quality Transit Area (HQTA) and 0.1 mile from the Ventura Boulevard transit corridor, which provides 15-minute Rapid Bus Service during peak hours. Proximity of the Project to transit would facilitate the use of Bus Rapid Transit (BRT) for people accessing the Project Site. As such, the Project would not conflict with strategies that emphasize land use patterns facilitating multi-modal access to work, educational and other destinations.
Plan for growth near transit investments and support implementation of first/last mile strategies.	No Conflict. The Project Site is within 0.1 mile of the Ventura Boulevard Rapid Bus Corridor and, as such, would support growth near transit investments. The 2020-2045 RTP/SCS recommends an increase in the number of trips accomplished by walking, bicycling and the use of micro-mobility devices to reduce automobile vehicle miles traveled (VMT) These strategies include building physical infrastructure, such as local and regional bikeways, sidewalks, and safe routes to schools, pedestrian improvements, regional greenways, and first-last mile connections to transit. According to the 2020-2045 RTP/SCS, these strategies would also improve air quality and public health by reducing emissions and increasing levels of physical activity. Because of its proximity to the Ventura Boulevard Rapid Bus Corridor (0.1 mile) and existing sidewalks between the Project Site and Ventura Boulevard and throughout the area, the Project would encourage walking between the transit corridor and the Project Site. In addition, with public access to the Project’s open space, the Project would encourage walking between the Project Site and the surrounding neighborhoods. As such, the Project would not conflict with the 2020-2045 RTP/SCS strategy that plan for growth near transit investments to reduce automobile vehicle miles, reduce air emissions, and improve public health through first/last mile strategies.

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Strategy	Would the Project Conflict?
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	No Conflict. The Project would represent an infill development within a HQTA that would increase amenities, including public amenities, and connectivity in the existing area. As an infill use, it 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. Further, the development of the Project would increase opportunities in the Studio City area related to access to the Zev Greenway and the Los Angeles River by bicycle and walking. As such, the Project would not conflict with policies that prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	No Conflict. The Project would provide shuttle bus service for students, employees, visitors, and spectators (the primary School users of the Project) and would, thus, reduce the number of single occupancy vehicle trips. The Studio City location of the Project was selected to maintain a close distance between the Upper School Campus and this off-site recreational use in order to reduce VMT between the Project Site and the Upper School Campus (a driving distance of approximately 0.9 mile). The Project Site is located less than one mile from the Ventura Boulevard transit corridor, which would allow for access to the site via transit, including BRT. In addition, the development of the Project would increase opportunities in the Studio City area and adjacent surrounding neighborhood for access to the Project Site’s publicly-accessible open space and trails, the Zev Greenway, and the Los Angeles River by bicycle and walking. As such, the Project would not conflict with strategies that encourage design and transportation options that reduce the reliance on and number of solo car trips.
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	No Conflict. The Project would remove and replace invasive plant and tree species with native plants and RIO-compliant tree species. This would reduce irrigation demand and conserve water resources. The Project would reduce stormwater runoff into the Los Angeles River. Stormwater would be collected from Whitsett Avenue, upstream from the Project Site, as well as from throughout the Project Site and roofs. This system would filter the water, control runoff rates, and significantly reduce the amount of water used on the Project Site for irrigation. As such, it would improve water quality prior to flowing into the river and reduce potential flooding hazard around the Project Site. The Project would reduce vehicle miles and emissions through the use shuttle buses (as opposed to single-occupancy or low-occupancy automobiles) to transport students, employees, visitors, and spectators, thus, reducing GHGs that contribute to climate change. As such, the Project would not conflict with strategies that support development of local climate adaptation and hazard

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Strategy	Would the Project Conflict?
	mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	<p>No Conflict. The Project would reduce reliance on electricity by installing solar voltaic panels on the roof of gymnasium to reduce the amount of electricity drawn from City utilities. It would provide free electric vehicle charging stations, harvest natural light for the main spaces in the gymnasium building by using large expanses of glass and skylights and utilize energy-efficient, LED lighting fixtures throughout the Project Site.</p> <p>A new high efficiency variable capacity HVAC system would reduce energy demand. In addition, the existing uses would be replaced with new athletic and recreational facilities, including athletic fields utilizing artificial grass as a sustainable alternative to turf grass. This use would reduce irrigation water demand, avoid the use of pesticides, and eliminate all emissions from diesel-powered mowing equipment, as under existing conditions. The Project would maintain approximately 41 percent of the Project Site as pervious areas to allow water to reach below the top surface condition. In addition, the installation of 393 native and RIO District-approved trees (a net increase of approximately 153 trees over existing conditions), particularly with the replacement of fan palms with leafy tree species, would not conflict with policies supporting carbon sequestration. The majority of parking would be provided in a subterranean structure, which would reduce reflected heat and heat island effect of a large surface parking lot. As such, the Project would not conflict with strategies that support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.</p>
Promote more resource efficient development focused on conservation, recycling and reclamation.	<p>No Conflict. The Project would conserve water by reclaiming the existing Project Site through the replacement of invasive tree species with native species, the vast majority of which are also identified in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.^a In addition, through its runoff capture, filtration, and reuse system, it would conserve water by greatly decreasing the amount of potable water used for Project Site irrigation, and, during significant rain events when on-site water storage capacity has been reached, the Project would improve the quality and rate of stormwater runoff into the Los Angeles River and would, thus, promote conservation efforts to restore the river. The Project would replace existing grass sod with artificial turf to reduce water demand and use of pesticides. The gymnasium building would use solar voltaic panels, maximize the harvesting of natural light through large expanses of glass and skylights, and daylighting systems would coordinate the levels of artificial lighting, thus, reducing the building’s energy requirements and conserve energy. The Project would also provide water bottle filling stations to reduce waste from disposal</p>

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Strategy	Would the Project Conflict?
	of water bottles and would, thus, conserve solid waste demand and potential side effects of improperly discarded plastic bottles on the environment (such as contamination of the nearby Los Angeles River). As such, the Project would not conflict with strategies that promote more resource efficient development focused on conservation, recycling and reclamation.
Preserve, enhance and restore regional wildlife connectivity	No Conflict. The Project Site is surrounded by urbanized development on the three sides, with the concrete channelized Los Angeles River to the south. As discussed in Section IV.C, Biological Resources, in the Draft EIR, the Biological Study Area does not function as a regional wildlife corridor and is not known to support wildlife nursery area(s). Nonetheless, the Project would provide more native habitat (trees and shrubs) in proximity to the Los Angeles River than under existing conditions. The presence of additional native habitat and green cover on the Project Site would allow for the movement of wildlife through the Project Site and provide habitat for migratory bird species. As such, the Project would not conflict with strategies to preserve, enhance and restore regional wildlife connectivity.
Reduce consumption of resource areas, including agricultural land	No Conflict. The Project would not conflict with strategies to reduce consumption of resource areas, including agricultural land. The Project Site is zoned A1 for agricultural and other uses, and operates as a tennis club and golf course, also permitted within the A1 zone. Since the Project Site is not used for agricultural (agrarian) uses, the Project would not change any existing agricultural use of the Project Site and, therefore, development on this site would allow for the Project’s recreational and open space uses without the consumption of any existing resource areas or agricultural land.
Identify ways to improve access to public park space	No Conflict. The Project would provide a direct pathway to the Zev Greenway along the Los Angeles River and, thus, improve access from the Project Site to this public recreational use. The Project would also install an off-site ADA-compliant pedestrian ramp from Coldwater Canyon Avenue to the Zev Greenway to improve access to the latter public space. It would also provide 5.4 acres of landscaped open space and trails for public use, with gateway access at eight locations around the Project Site, and ongoing access to and use of the Project’s recreational and athletic facilities when not in use by the School. As such, the Project would not conflict with strategies that identify ways to improve access to public park space.

NOTE:

^a Los Angeles County Department of Public Works, Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes, January 2004, available at: http://ladpw.org/wmd/watershed/la/lar_planting_guidelines_webversion.pdf

SOURCE: ESA, 2022.

TABLE LU-2
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
GENERAL PLAN FRAMEWORK ELEMENT INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL
EFFECT

Goal, Objective or Policy	Would the Project Conflict?
Land Use Chapter	
<p>Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.</p>	<p>No Conflict. The Project Site is an existing non-residential 17.2-acre property within an urbanized area. The Project Site is located within a SCAG-defined HQTAs, in which redevelopment and growth is encouraged. The Project would be located within 0.1 mile of Ventura Boulevard, which provides BRT service within 0.5 mile of the Harvard-Westlake Campus. The Project would make use of shuttle buses to transport students, employees, visitors, and spectators between the Harvard Westlake Upper School campus and the Project Site. The Project would also offer electric vehicle charging, which would reduce the air pollution normally generated by the combustion of automotive fossil fuels. The Project would provide recreational opportunities and 5.4 acres of landscaped open space available for public use and access in the Studio City community, an area in which parks and open space uses are currently in short supply. As such, it would reduce trips by local residents to park facilities located outside of the area, and, as it would be located adjacent to residential neighborhoods, it would be accessible by walking and cycling to many local residents. With the location of this use within an existing developed area and in proximity to BRT service and other transit, the Project Site would be accessible by transit, as well as walking, and bicycle. Therefore, the location would facilitate a reduction of vehicle trips, VMT, and air pollution. As such, the Project would not conflict with policies that provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.</p>
<p>Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations</p>	<p>No Conflict. The Project Site is located along the Zev Greenway and would facilitate direct pedestrian access to the Zev Greenway trail through the Project Site in contrast to existing conditions, whereby the Project Site offers no such connectivity. In addition, by providing several access gateways to publicly-accessible landscaped trails within the Project Site, the Project is designed to promote pedestrian access. In addition, the Project would incorporate bicycle parking facilities and, thus, facilitate bicycle use and access to the Project Site from the existing bike path along the south side of the Los Angeles River and between the Project Site and the surrounding community. Finally, the Project would create a new ADA-compliant pedestrian ramp from Coldwater Canyon Avenue to the Zev Greenway, where currently there is none, thereby increasing pedestrian opportunities in the Project vicinity. As such, the provision of open space and recreational facilities on the existing non-residential Project Site in proximity to the regional Los Angeles River Greenway would be an example of a land use pattern that emphasizes pedestrian/bicycle access. Therefore, the Project would not conflict with policies that provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>

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Goal, Objective or Policy	Would the Project Conflict?
<p>Objective 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.</p>	<p>No Conflict. The Project would comprise a primarily recreational and open-space use on an existing, non-residential property. Uses would include 5.4 acres of landscaped open space and trails, two athletic fields, swimming pools, tennis courts, and gymnasium. The gymnasium and pool canopies would not exceed 30 feet in height, and the gymnasium has been specifically located on the Project Site at a point farthest away from nearby residences (approximately 400 feet to the north and 450 feet to the east). Other structures (field lights and poles) would be set back from the adjacent residential neighborhood, would be shorter than the existing driving range netting poles (which reach 100 feet in certain sections), would be shielded and directed to the recreational uses to reduce off-site glare (direct view of the light source), and would not affect light levels or character of the adjacent residential neighborhoods (please refer to the lighting study in Section IV.A, <i>Aesthetics</i>, of this Draft EIR). The interface between the Project Site's athletic fields and other recreational uses and the off-site residential neighborhood would be heavily landscaped so that the effects of the light poles would be diminished (please refer to Figure II-15, <i>Valley Spring Lane Elevations</i>, Figure II-6, <i>Valley Spring Lane and Whitsett Avenue Elevations</i>, Figure II-17, <i>Whitsett Avenue Elevations</i>, in Chapter II, <i>Project Description</i>, of this Draft EIR). With dense landscaping, walls, and natural earthen berms, and the landscaped, open character of the Project, the Project would not result in incompatibility of scale or effects on the character of the surrounding residential community. As such, the Project would not conflict with policies that provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods.</p>
<p>Urban Form and Neighborhood Design Chapter</p>	
<p>Policy 5.9.1: Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.</p>	<p>No Conflict. The Project would improve safety and surveillance by providing lighting along pathways, around the 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 located in the underground parking structure, and 24-hour, on-site security, which would be provided seven days a week. Access to the Project Site would be via eight gates along the Project Site's four frontages, with fencing to prevent unauthorized park use and which would be monitored by on-site security and closed and secured between the hours of 9:00 p.m. and 7:00 a.m. The Project Site would be monitored by closed-circuit television (CCTV) cameras, and patrols would be conducted at random during each guard's eight-hour shift. During the periods in which students are using Project facilities, one security person would be continually stationed at the pedestrian entrance to ensure that parking does not take place in the neighborhood. Security personnel assigned to patrol Valley Spring Lane would also be</p>

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Goal, Objective or Policy	Would the Project Conflict?
	<p>responsible for monitoring the neighborhood to the north of Valley Spring Lane to ensure that students and visitors are not parking in the neighborhood. By providing more parking spaces than required by the LAMC, the School would accommodate the parking needs of its students, employees, spectators, and visitors on-site to ensure they do not park in the surrounding community. Off-site parking for the Project Site’s users would be prohibited through the following measures: (i) security patrols present north of the Project Site on Valley Spring Lane during events to enforce no neighborhood or other off-site parking; (ii) security guard placed at the pedestrian entrance on Whitsett Avenue to screen visitors for neighborhood parking and to return visitors to their car if inappropriately parked; and (iii) on days in which event attendance is expected to surpass 300 spectators, tickets and parking passes would be required for visitors to enter the Project Site. This includes single events or combined events. For reference, attendance reached this level fewer than ten times during Harvard-Westlake School’s 2018-2019 school year and is anticipated to be similarly infrequent at the Project Site. On ticketed days, visitors without parking passes would be directed to the Upper School Campus on Coldwater Canyon Avenue to utilize the shuttle service to the Project Site.</p> <p>Dependent on changes in grade and the locations and heights of landscaped berms, the Project would provide walls that vary in height between eight feet and 11 feet at different points on the Project Site to separate the field area(s) from public trail areas and to reduce noise levels in the surrounding neighborhood. Further, a landscaped berm varying in height between three and five feet would be located inside the existing line of trees along the Project Site periphery to improve the appearance of the Project Site as viewed from the adjacent residential neighborhood. Such security measures would reduce impacts on public services, such as LAPD services. The Project would not conflict with policies that facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments.</p>

Open Space and Conservation Chapter

<p>Objective 6.1: Protect the City’s natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City’s natural resources to contribute to the sustainability of the region.</p>	<p>No Conflict. The Project would be developed within an existing 17.2-acre non-residential property adjacent to the Zev Greenway, which is part of the Los Angeles River Greenway. The Project would provide 5.4 acres of landscaped open space available for public use, including a pathway to the Zev Greenway. A tree and landscaping program would provide for the removal of 240 trees of the existing 421 inventoried on-and off-site. Overall, the Project would plant 393 new trees, resulting in an overall net increase of 153 trees beyond existing</p>
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Goal, Objective or Policy	Would the Project Conflict?
	<p>conditions. The majority of removed trees (179 trees or 75 percent) are non-RIO District-compliant (122 invasive Mexican fan palms). Of the 240 trees to be removed, 31 trees (the majority of which are Mexican fan palms) are located off-site in the public right-of-way, and no trees would be removed within the Zev Greenway Area (off-site). All other invasive palms (i.e., the Mexican fan palm) would be removed and replaced at a 1:1 minimum ratio with RIO District-compliant trees, and all other removed non-native trees would be replaced at a minimum 2:1 ratio with RIO District-compliant trees. As such, the Project would contribute to the Los Angeles River setting and the sustainability of the region. Thus, the Project would not conflict with policies that protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.</p>
<p>Policy 6.1.2: Coordinate City operations and development policies for the protection and conservation of open space resources by:</p> <ul style="list-style-type: none"> a. Encouraging City departments to take the lead in utilizing water re-use technology, including graywater and reclaimed water for public landscape maintenance purposes and other such purposes as may be feasible; and b. Preserving habitat linkages, where feasible, to provide wildlife corridors and to protect natural animal ranges. 	<p>No Conflict.</p> <ul style="list-style-type: none"> a. The Project would collect, filter, and store surface water runoff, including stormwater, from Whitsett Avenue upstream from the Project Site and from throughout the Project Site, including building roofs. Storage capacity would be up to one million gallons, plus several thousand additional gallons that would circulate in the Project's multiple water feature bio-habitats. Stored water would be reused for the Project's extensive landscaping program, much of which would serve the publicly-accessible open space areas and streetscape in the public right-of-way. b. The Project's landscaping program would increase the presence of native trees and shrubs, consistent with the RIO District Ordinance. The presence of additional native habitat and green cover on the Project Site would allow for the movement of wildlife through the Project Site, and provide habitat for migratory bird species. As such, the Project would enhance the connectivity of habitat and foraging areas for wildlife in this area. The increase in native plant species would enhance habitat linkages along the Los Angeles Greenway and protect natural animal ranges. <p>Therefore, the Project would not conflict with policies that coordinate City operations and development policies for the protection and conservation of open space.</p>
<p>Objective 6.2: Maximize the use of the City's existing open space network and recreation facilities by enhancing those facilities and providing connections, particularly from targeted growth areas, to the existing regional and community open space system.</p>	<p>No Conflict. The Project, which is located within a SCAG-defined HQT, would provide a direct link to the Zev Greenway, where currently there is none, through an ADA-compliant ramp from the Project Site to the Zev Greenway, as well as from Coldwater Canyon Avenue to the Zev Greenway. Because the Project would provide a link to the Zev Greenway and the Project's landscaping program would increase the presence of native trees and shrubs, consistent with the RIO District Ordinance, the Project would enhance the linkage to the regional Los Angeles River Greenway and add to the</p>

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Goal, Objective or Policy	Would the Project Conflict?
	City's open space network. Therefore, the Project would not conflict with policies that maximize the use of the City's existing open space network and recreation facilities by enhancing those facilities and providing connections, particularly from targeted growth areas, to the existing regional and community open space system.
Policy 6.2.1: Establish, where feasible, the linear open space system represented in the Citywide Greenways Network map, to provide additional open space for active and passive recreational uses and to connect adjoining neighborhoods to one another and to regional open space resources.	No Conflict. The Project would provide 5.4 acres of landscaped open space trails that would connect to the Zev Greenway, a component of the regional Los Angeles River Greenway. It would also install an ADA-compliant off-site pedestrian ramp at Coldwater Canyon Avenue and the Zev Greenway to enhance public access to the Zev Greenway. As such, it would improve the connectivity of the Zev Greenway to the regional network. The Project would also provide significant new sources of active recreation and outdoor activities for the general public. Therefore, the Project would not conflict with policies to establish the linear open space system represented in the Citywide Greenways Network map, to provide additional open space for active and passive recreational uses and to connect adjoining neighborhoods to one another and to regional open space resources.
Objective 6.3: Ensure that open space is managed to minimize environmental risks to the public.	No Conflict. Under the Project, stormwater runoff that can cause erosion or degradation of the Los Angeles River would be collected from Whitsett Avenue, upstream from the Project Site and from within the Project Site. Captured stormwater would be treated and reused. Reclaimed water would be stored in underground cisterns with a total capacity of one million gallons. The reclaimed water would be used for irrigation within the publicly-accessible 5.4 acres (235,224 square feet) of walking paths and wooded areas, as well as for the Project's bio-habitat water features. If capacity in the underground cisterns were reached, stormwater flowing from the residential neighborhood to the north of the Project Site would continue to be collected and treated before being discharged back onto Whitsett Avenue where it would flow into the Los Angeles River. The implementation of this system would upgrade the volume and quality of flow to the Los Angeles River. As such, it would minimize environmental risks to the public related to flooding and degraded water quality. Therefore, the Project would not conflict with policies to ensure that open space is managed to minimize environmental risks to the public.
Objective 6.4: Ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.	No Conflict. In the replacement of the existing privately-owned tennis and golf facility, the Project would contribute to the stability and character of the surrounding community by providing opportunities for the enjoyment of open space, a greater variety of active and passive recreational opportunities, habitats with native trees and vegetation, special event spaces, as well as a community meeting room available for public use. In addition, the Project would upgrade the streetfront along the adjacent residential streets with new trees, dense landscaping consistent with the requirements of the RIO District

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Goal, Objective or Policy	Would the Project Conflict?
	Ordinance, and a walking path that circumnavigates the entire Project Site for a distance of approximately 0.75 mile. Under existing conditions, a pedestrian walkway is only available along Whitsett Avenue; the other three sides of the Project Site are fenced off immediately adjacent to the property line and do not provide any public walkway or access point. Therefore, the Project would not conflict with policies that ensure that the City's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.
Policy 6.4.8.b: Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.	No Conflict. The Project would provide recreational and open space uses that would replace an existing privately-owned tennis and golf facility, currently only available to paying customers for those two specific recreational purposes. The Project would include 5.4 acres of landscaped open space available for public use, as well as direct access to the adjacent Zev Greenway along the Los Angeles River. New landscaping and trees consistent with the requirements of the RIO District Ordinance would serve as neighborhood landscaping. In addition to publicly-accessible open space, the Project would provide recreational amenities to the community and, thus, relieve demand on the area's recreational services and facilities. Therefore, the Project would not conflict with policies that encourage the improvement of open space, both on public and private property.
Public Facilities and Infrastructure Chapter	
Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.	No Conflict. The Project would contribute to the City's stormwater management system by capturing surface water runoff at Whitsett Avenue, upstream from the Project Site, as well as throughout the approximately 17.2-acre Project Site. The water would be stored and filtered for reuse on-site and to provide controlled delivery to the Los Angeles River during a large storm event. The management of currently uncontrolled surface flow from the collection location on Whitsett Avenue would reduce potential flooding, reduce vehicular safety hazards in that same area, and improve water quality flowing into the Los Angeles River (please refer to Section IV.I, <i>Hydrology and Water Quality</i> , of this Draft EIR). Therefore, the Project would not conflict with policies regarding stormwater management that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.
Objective 9.5: Ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.	No Conflict. The Project's stormwater collection system would reduce flood hazard in the area between Valley Spring Lane and the Los Angeles River, as well as maintenance requirements related to the existing stormwater drainage system in the area. Therefore, the Project would not conflict with policies to ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.

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Goal, Objective or Policy	Would the Project Conflict?
<p>Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.</p>	<p>No Conflict. Under the Project, stormwater runoff that can cause erosion or degradation of the Los Angeles River would be collected along Whitsett Avenue, upstream from the Project Site and from within the Project Site. Captured stormwater would be treated and reused. Reclaimed water would be stored in underground cisterns with a total capacity of one million gallons. The reclaimed water would be used for irrigation within the publicly-accessible 5.4 acres (235,224 square feet) of walking trails and wooded areas, as well as for the Project’s bio-habitat water features. If capacity in the underground cisterns were reached, stormwater flowing from the residential neighborhood to the north of the Project Site would continue to be collected and treated before being discharged back onto Whitsett Avenue where it would flow into the Los Angeles River. The implementation of this system would help regulate the volume of flow to the Los Angeles River, improve water quality, and minimize environmental risks to the public. Therefore, the Project would not conflict with policies to pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.</p>

SOURCE: ESA, 2022.

**TABLE LU-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
OPEN SPACE ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE
AN ENVIRONMENTAL EFFECT**

Policies	Would the Project Conflict?
Goals	
<p>To ensure the preservation and conservation of sufficient open space to serve the recreational, environmental, health and safety needs of the City</p>	<p>No Conflict. The entire Project Site would be available for public use, including 5.4 acres of publicly-accessible, landscaped open space on a property with no existing free public access. The provided open space would increase the City’s open space resources and contribute to the recreational, health, and safety needs of the City. Therefore, the Project would not conflict with policies to ensure the preservation and conservation of sufficient open space to serve the recreational, environmental, health and safety needs of the City.</p>
<p>To conserve unique natural features, scenic areas, cultural and appropriate historical monuments for the benefit and enjoyment of the public</p>	<p>Partial Conflict. The Project would retain its significance as a 1950s community recreational facility, all of the identified character-defining features of the Historic-Cultural Monument, 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. Accordingly, impacts on an historical resource as defined in CEQA Guidelines Section 15064.5 were determined to be less than significant (see Section IV. D, <i>Cultural Resources</i>, of this Draft EIR). Although the Project would not less than significant impacts to historical resources, it could partially conflict with any policy that would require conservation of all historical features. Currently occupied by a private, 9-hole, 27-par golf course, golf driving, and tennis courts, and devoid of native trees, the Project Site does not contain any natural features that are appropriately paired with the Los Angeles River or the City’s goals for river revitalization. The Project would remove invasive tree species and add RIO District-approved native tree species that would contribute to the existing natural character of the Project Site and the public enjoyment of the Project Site and the adjacent Zev Greenway and Los Angeles River. Therefore, the Project would not conflict with policies to conserve unique natural features or scenic areas for the benefit and enjoyment of the public.</p>
<p>To conserve and/or preserve those open space areas containing the City’s environmental resources including air and water</p>	<p>No Conflict. The existing tennis courts and landscaped golf course within the Project Site provide a more natural environmental setting as compared to the surrounding developed residential community to the west, east, and north, and the commercial district to the south of the Los Angeles River. The Project would expand upon that natural setting with new and more diverse opportunities for recreation, the provision of 5.4 acres of publicly-accessible open space, and implementation of an extensive landscaping program, including the replacement of invasive tree species with RIO District-compliant, native trees, for a net increase of approximately 153 trees. Thus, the Project would not only conserve but enhance the open space character</p>

**TABLE LU-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
OPEN SPACE ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE
AN ENVIRONMENTAL EFFECT**

Policies	Would the Project Conflict?
	of 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 into the Los Angeles River. As such, the Project would reduce surface water runoff and siltation during high storm events and improve the quality of water reaching the river. Therefore, the Project would not conflict with policies to conserve and/or preserve those open space areas containing the City's environmental resources, including air and water.
To provide access, where appropriate, to open space lands	No Conflict. The Project would not conflict with policies to provide access, where appropriate, to open space lands. The Project's open space system would provide trails that would tie into the Zev Greenway, a segment of the Los Angeles Greenway, and provide off-site connectivity between Coldwater Canyon Avenue and the Zev Greenway via a new ADA-compliant pedestrian ramp.
Objectives	
To establish standards for the location, quantity, quality, conservation and preservation of open space	No Conflict. The Project would not conflict with policies to establish standards for the location, quantity, quality, conservation and preservation of open space. The Project's 5.4 acres of publicly-accessible, landscaped open space would be located in a highly urbanized area and would replace existing non-RIO compliant trees with native trees that meet RIO standards. It would provide a direct public connection to the Zev Greenway along the Los Angeles River and at its intersection with Coldwater Canyon Avenue. The Project's open space would be highly accessible to the surrounding community and, with the high quality of native trees and shrubs, pathways, and seating, would meet a high standard with respect to location and quality of open space, as well as increasing the City's open space available for public use. Therefore, the Project would not conflict with policies to provide access, where appropriate, to open space lands.
To identify unique natural features, scenic areas and historical sites that are desirable for preservation	Partial Conflict. The Project would preserve the existing historic clubhouse for public use, remove invasive tree species, and add RIO District-approved native tree species that would contribute to the existing natural character of the Project Site. The Project would also preserve other character defining features which include putting green and low-brick wall, and golf ball-shaped light standards. The Project would retain its significance as a 1950s community recreational facility, all of the identified character-defining features of the Historic-Cultural Monument, 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. Accordingly, impacts on an historical resource as defined in CEQA Guidelines

**TABLE LU-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
CONSERVATION ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE AN
ENVIRONMENTAL EFFECT**

Policies	Would the Project Conflict?
Section 3, Archaeological and Paleontological Resources	
Objective: Protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.	No Conflict. The Project would implement the City's standard conditions of approval relative to protection of archaeological and paleontological resources to ensure that all impacts to archaeological and paleontological resources would be reduced to less than significant levels to ensure their availability for research or educational purposes. The Project would preserve the culturally important clubhouse, putting green, brick wall around the putting green, and golf ball-shaped light standards and, thus, would not impact these cultural resources. Therefore, the Project would not conflict with policies that protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.
Policy: Continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification.	No Conflict. See Section 3. Objective, above regarding protection of archaeological and paleontological resources. The Project would preserve the culturally important clubhouse, putting green, brick wall around the putting green, and golf ball-shaped light standards and, thus, would not impact these cultural resources. The Project would not conflict with policies that continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification.
Section 8, Erosion	
Objective: Protect the coastline and watershed from erosion and inappropriate sedimentation that may or has resulted from human actions.	No Conflict. The Project would implement storm water pollution prevention plan (SWPPP) best management practices (BMPs) during construction to reduce erosion during construction. During operation, 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 untreated into the Los Angeles River. As such, the Project would reduce surface water runoff and erosion during high storm events and improve the quality of water reaching the river. Therefore, the Project would not conflict with policies that protect the watershed from erosion and inappropriate sedimentation that may or has resulted from human actions.

**TABLE LU-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
CONSERVATION ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE AN
ENVIRONMENTAL EFFECT**

Policies	Would the Project Conflict?
Section 12, Habitats	
<p>Objective: Preserve, protect, restore and enhance natural plant and wildlife diversity, habitats, corridors and linkages so as to enable the healthy propagation and survival of native species, especially those species that are endangered, sensitive, threatened or species of special concern.</p>	<p>No Conflict. The Project’s 5.4 acres of publicly-accessible, landscaped open space would be located in a highly urbanized area and would replace existing invasive plant species and non-RIO District-compliant trees with native trees and understory native plantings that meet RIO standards. In doing so, the Project would expand and improve upon existing, limited foraging and wildlife habitat along the Zev Greenway. The Project would not interfere with special-status wildlife species or their movement. As such, it would meet a high standard with respect to protection of natural habitats, as well as enhancing survival of native species. Therefore, the Project would not conflict with policies that preserve, protect, restore and enhance natural plant and wildlife diversity, habitats, corridors and linkages so as to enable the healthy propagation and survival of native species, especially those species that are endangered, sensitive, threatened or species of special concern.</p>
<p>Policy 1: Continue to identify significant habitat areas, corridors and buffers and to take measures to protect, enhance and/or restore them.</p>	<p>No Conflict. The Project Site is not located within a significant habitat area and would not interfere with corridors or buffers. The Project would remove invasive plant and tree species and add native plants and RIO District-approved native tree species that would contribute to the existing natural character of the Project Site as well as enhancing the Zev Greenway along the Los Angeles River. Therefore, the Project would not conflict with policies that continue to identify significant habitat areas, corridors and buffers and to take measures to protect, enhance and/or restore them.</p>
<p>Policy 2: Continue to protect, restore and/or enhance habitat areas, linkages and corridor segments, to the greatest extent practical, within city owned or managed sites.</p>	<p>No Conflict. An extensive tree and landscaping program that would provide for the removal of 240 trees of the existing 421 inventoried on-and off-site. Overall, the Project would plant 393 new trees, resulting in an overall net increase of 153 trees beyond existing conditions. The majority of removed trees (179 trees or 75 percent) are non-RIO District-compliant (including 122 invasive Mexican fan palms). Of the 240 trees to be removed, 31 trees (the majority of which are Mexican fan palms) are located off-site in the public right-of-way, and no trees would be removed within the Zev Greenway Area (off-site). All other invasive palms (i.e., the Mexican fan palm) would be removed and replaced at a 1:1 minimum ratio with RIO-compliant trees and all other removed non-native trees would be replaced at a minimum 2:1 ratio with RIO-compliant trees. Other landscaping plantings, numbering in the tens of thousands, would also comprise native species and improve and expand upon existing, limited foraging and wildlife habitat along the Zev Greenway. The inclusion of circulating water bio-habitats would provide an opportunity for animal species along</p>

**TABLE LU-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
CONSERVATION ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE AN
ENVIRONMENTAL EFFECT**

Policies	Would the Project Conflict?
	<p>the Los Angeles River Greenway, such as bird species, to find further foraging and shelter areas. The increase of overall landscaping along the riverfront and native species would protect, restore, or enhance habitat areas and linkages. Therefore, the Project would not conflict with policies that continue to protect, restore and/or enhance habitat areas, linkages and corridor segments, to the greatest extent practical, within city owned or managed sites. The Project would implement</p>
Section 15, Land Form and Scenic Vistas Section	
<p>Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.</p>	<p>No Conflict. The Project Site is relatively flat and would not involve gradient changes or changes in scenic vistas across the Project Site. The Project, which would include 5.4 acres of open space for public use, would implement an extensive tree and landscaping program that would enhance the existing aesthetic character of the Project Site. The Project would improve the existing aesthetic character of the Project Site by reducing floodlight spillover and glare from the current tennis and golf uses. The Project would replace existing floodlights, which are currently operational daily until after 10:00 p.m., with highly-focused LED sports lighting fixtures that eliminate spillover and glare and would be turned off no later than 8:00 p.m. for the pool and athletic field components of the Project and no later than 9:00 p.m. for the tennis courts (see Section IV.A, <i>Aesthetics</i>, of this Draft EIR). Therefore, the Project would not conflict with policies that protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.</p>
<p>Policy: Continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing land forms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view or other access to unique features or scenic views.</p>	<p>No Conflict. The Project Site is relatively flat and would not involve gradient changes or changes in land forms or views of unique scenic features, such as ocean or historic features across the Project Site. Some existing views of the Hollywood Hills are available across the Project Site from the north (although nearer views across the Project Site are currently blocked by trees). Because the Project would provide 5.4 acres of open space and primarily open fields, with a height-conforming two-story gymnasium building and height-conforming pool canopy for sound attenuation, it would not affect existing views of the mountains located south of the Project Site. Therefore, the Project would not conflict with policies that continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing land forms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view or other access to unique features or scenic views.</p>

TABLE LU-4
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE
CONSERVATION ELEMENT OF THE GENERAL PLAN INTENDED TO AVOID OR MITIGATE AN
ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
<p>Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations</p>	<p>No Conflict. The Project is low rise in character and does not involve gradient changes or changes to natural or scenic vistas across the Project Site. Because the Project entails an intensive landscaping program and 5.4 acres of permanent open space, it would enhance the aesthetic enjoyment of the Project Site for present and future generations. Therefore, the Project would not conflict with policies that protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.</p>

SOURCE: ESA, 2022.

**TABLE LU-5
CONSISTENCY OF THE PROJECT WITH POLICIES OF THE
SHERMAN OAKS - STUDIO CITY - TOLUCA LAKE - CAHUENGA PASS COMMUNITY PLAN INTENDED TO
MITIGATE ENVIRONMENTAL EFFECTS**

Policy	Would the Project Conflict?
Issues Identified for the Project Site:	
Possible future alternative development of the site compatible with the surrounding area	No Conflict. The Project would be comprised of recreational facilities and landscaped open space for the benefit of the School, as well as the general public. This use would increase the total trees on-site and provide permanent open space that would not encroach into the adjacent residential neighborhood or the river. Such facilities, namely schools and parks, are typically located within residential neighborhoods and are not considered to be incompatible with residential uses. Therefore, the Project would not conflict with issues identified for the Project Site, including possible future alternative development of the site compatible with the surrounding area.
Lack of public funding to convert the site to a public park	No Conflict. The entire Project Site would be open to the public, with landscaped trails (open space) and multiple forms of recreation that could be used when not otherwise occupied by the School and would relieve the demand for public funding for such open space uses on the Project Site. The public amenities would be constructed and maintained by the School and would not require the use of public funds. As part of the Project, Harvard-Westlake School would also maintain the Zev Greenway, relieving the County from that ongoing expense. Therefore, the Project would not conflict with issues identified for the Project site, including the lack of public funding to convert the site to a public park.
Recreation and Open Space Goals and Policies:	
Recreation and Open Space Issue: Addition, expansion, and/or improvement of needed local parks throughout the Community should be accelerated, where feasible	No Conflict. The Project would expand the Community's options for recreation and park space and would, thus, address this issue. As such, the Project would not conflict with recreation and open space issues related to the acceleration of the addition, expansion, and/or improvement of needed local parks throughout the Community Plan area, where feasible.
Goal 4: Adequate Recreation and Park Facilities to Meet the Needs of the Residents in the Plan Area	No Conflict. The Project would expand the Community's options for recreation and park space and would, thus, meet this goal. Therefore, the Project would not conflict with issues related to adequate recreation and park facilities to meet the needs of residents in the Community Plan area.
Objective 4-1: To conserve, maintain and better utilize existing recreation and park facilities which promote the recreational experience	No Conflict. The Project is located on a private property that supplements the Community Plan area's options for recreational uses. The provision of landscaped trails to the public, the use of numerous recreational facilities and community room, and pathway access to Zev Greenway, would maintain the recreational purpose of the Project Site and promote the public's outdoor and recreational experience. Therefore, the Project would not conflict with policies to

**TABLE LU-5
CONSISTENCY OF THE PROJECT WITH POLICIES OF THE
SHERMAN OAKS - STUDIO CITY - TOLUCA LAKE - CAHUENGA PASS COMMUNITY PLAN INTENDED TO
MITIGATE ENVIRONMENTAL EFFECTS**

Policy	Would the Project Conflict?
	conserve, maintain and better utilize existing recreation and park facilities which promote the recreational experience.
Policy 4-1.1: Preserve the existing recreational facilities and park space	No Conflict. The Project would not require the removal or reduction of any existing public recreational or park space and, thus, would conserve the area’s recreational uses. While golf would no longer be an available form of recreation on the Project Site, eight tennis courts would remain and be supplemented with a wide variety of field and gym-based sports, alongside new opportunities for the public to enjoy free outdoor recreation and relaxation via 5.4 acres of open space around and among the Project’s athletic facilities. Therefore, the Project would not conflict with policies to preserve the existing recreational facilities and park space.
Policy 4-1.2 Increase accessibility to the Los Angeles River	No Conflict. The Project would provide a landscaped pathway to the Zev Greenway along the Los Angeles River and provide an off-site ADA-compliant pedestrian ramp to the Zev Greenway from Coldwater Canyon Avenue. Therefore, the Project would not conflict with policies to increase accessibility to the Los Angeles River.
Program: The plan identifies certain properties as key sites for future development of properties serving as access to the river for recreational purposes.	No Conflict. The Project, which would provide access to the Zev Greenway, is identified as a key site for providing access to the river for recreational purposes. The Community Plan identifies the Project Site and provides for better access from the Site to the Los Angeles River than currently exists. Under existing conditions, no access through the Project Site to the river is available. The entire Project site, constituting 17.2 acres, would continue to serve recreational purposes for both the School and the community. Therefore, the Project would not conflict with policies pertaining to certain properties identified as key sites for future development serving as access to the river for recreational purposes.
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	No Conflict. The Project would provide 5.4 acres of landscaping and pathways for public use, daily from 7:00 a.m. to 9:00 p.m. It would also allow public use of the two fields, tennis courts, pool, and gymnasium facilities when not in use by the School. Therefore, the Project would not conflict with policies related to creating 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.
Objective 5-1: To preserve existing open space resources and where possible develop new open space	No Conflict. The Project would increase existing open space resources compared to existing conditions, in which all facilities are part of a private golf and tennis facility. Therefore, the Project would not conflict with policies to preserve existing open space resources and where possible develop new open space.

**TABLE LU-5
CONSISTENCY OF THE PROJECT WITH POLICIES OF THE
SHERMAN OAKS - STUDIO CITY - TOLUCA LAKE - CAHUENGA PASS COMMUNITY PLAN INTENDED TO
MITIGATE ENVIRONMENTAL EFFECTS**

Policy	Would the Project Conflict?
Policy 5-1.1: Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.	No Conflict. The Project would increase existing open space resources compared to existing conditions, in which all facilities are part of a private golf and tennis facility. Therefore, the Project would not conflict with policies that encourage the retention of passive and visual open space, which provides a balance to the urban development of the Community Plan area.
Policy 5-1.2: Accommodate active parklands, and other open space uses.	No Conflict. The Project would promote active parkland by accommodating for public use of the athletic fields, tennis courts, pool, and gymnasium facilities when these facilities are not in use by the School. Further, by integrating 5.4 acres of landscaped public open space on the Project Site with the adjacent Zev Greenway, usability and appeal would be expanded. Therefore, the Project would not conflict with policies to accommodate active parklands, and other open space uses.
Policy 5-1.3: Require development in major opportunity sites to provide public open space.	No Conflict. The Project would provide 5.4 acres of landscaped public open space, as well as pathway access to the Zev Greenway, and use of all other Project athletic and recreational facilities when not otherwise in use by the School. Therefore, the Project would not conflict with policies to require development in major opportunity sites to provide public open space.
Action 3. Ensure that parks are adequately illuminated and secured for safe use at night, as appropriate.	No Conflict. Under the Project, lighting would be provided for outdoor athletic events and activities during the evening hours, up until 8:00 p.m. for the pool and athletic field components of the Project and up until 9:00 p.m. for the tennis courts. Low-level lighting would be provided along pathways, around the Project’s gymnasium building, in the surface parking area, and in entrance areas for security and wayfinding purposes. In addition, lighting to accent signage and landscaping elements would be installed throughout the Project Site. Therefore, the Project would not conflict with policies to ensure that parks are adequately illuminated and secured for safe use at night, as appropriate.
Action 4. Coordinate with the Department of Recreation and Parks and the Police Department to ensure adequate police patrols and “defensible space,” where feasible, in the design of recreation and park facilities	No Conflict. Under the Project, on-site security would be provided at the Project Site seven days a week, twenty-four hours per day. The Project Site would be monitored by CCTV cameras, and patrols would be conducted at random during each guard’s eight-hour shift. While open to the community much of the day, the Project’s landscaping plan calls for gates, berms, fences, and other natural and built barriers so that the Project Site may be secured when unoccupied. Therefore, the Project would not conflict with policies related to coordination with the Department of Recreation and Parks and the LAPD to ensure adequate police patrols and “defensible space,” where feasible, in the design of recreation and park facilities.

**TABLE LU-5
CONSISTENCY OF THE PROJECT WITH POLICIES OF THE
SHERMAN OAKS - STUDIO CITY - TOLUCA LAKE - CAHUENGA PASS COMMUNITY PLAN INTENDED TO
MITIGATE ENVIRONMENTAL EFFECTS**

Policy	Would the Project Conflict?
<p>Action 5. Promote the supervision of park activities and enforcement of codes restricting illegal activity.</p>	<p>No Conflict. Under the Project, on-site security and monitoring by CCTV cameras and patrols would ensure that codes restricting illegal activity would be enforced. Therefore, the Project would not conflict with policies to promote the supervision of park activities and enforcement of codes restricting illegal activity.</p>
<p>Action 8. Plan and design the expansion of existing facilities and the acquisition of new sites to minimize the displacement of housing and the relocation of the residents.</p>	<p>No Conflict. The Project would include new recreational uses on the site of an existing privately-owned golf course and tennis club. It would provide 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. It would not require the displacement of housing or relocation of residents. Therefore, the Project would not conflict with policies to plan and design the expansion of existing facilities and the acquisition of new sites to minimize the displacement of housing and the relocation of the residents.</p>
<p>Action 9. Target the provision of park and recreation facilities in areas with the greatest deficiencies</p>	<p>No Conflict. The Community Plan states that the community is “deficient in the number of neighborhood parks”. The Project would expand the community’s public park and recreational uses through its 5.4 acres of public open space, including water features, benches, wooded areas and natural spaces open and available to the public from 7:00 a.m. to 9:00 p.m., seven days a week. Landscaped, publicly-accessible trails, which would circumnavigate the Project Site for a distance of approximately 0.75 mile, would allow dog walking, recreation, relaxation, and observation of the natural setting and biodiversity around the Project Site. Therefore, the Project would not conflict with policies to target the provision of park and recreation facilities in areas with the greatest deficiencies.</p>
<p>Light and Glare:</p> <ol style="list-style-type: none"> 1. Installing on-site lighting along all pedestrian walkways and vehicular access ways 2. Shielding and directing of on-site lighting onto driveways and walkways, directed away from adjacent residential uses 	<p>No Conflict. Lighting would be provided along pathways, around the Project’s gymnasium building, in the surface parking area, and in entrance areas for security and wayfinding purposes. All lighting, including field lights would be shielded and directed onto the use being illuminated and away from adjacent residential uses, in compliance with existing regulatory standards (see Section IV.A, <i>Aesthetics</i>, of this Draft EIR.) Therefore, the Project would not conflict with policies regarding (1) installing on-site lighting along all pedestrian walkways and vehicular access ways and (2) shielding and directing on-site lighting onto driveways and walkways, directed away from adjacent residential uses</p>

**TABLE LU-5
CONSISTENCY OF THE PROJECT WITH POLICIES OF THE
SHERMAN OAKS - STUDIO CITY - TOLUCA LAKE - CAHUENGA PASS COMMUNITY PLAN INTENDED TO
MITIGATE ENVIRONMENTAL EFFECTS**

Policy	Would the Project Conflict?
<p>Public Open Space: Establish public open space standards that will guide the design of new public plazas and open spaces. These standards should include the following:</p> <ol style="list-style-type: none"> 1. Consideration of the siting of open space to maximize pedestrian accessibility and circulation 2. Solar exposure or protection 3. Adjacency to pedestrian routes and other open spaces 4. Appropriate plant and hard scape materials 	<p>No Conflict.</p> <ol style="list-style-type: none"> 1. Regarding the consideration of the siting of open space to maximize pedestrian accessibility and circulation, the Project would maximize the use of open space to accommodate pedestrian accessibility and circulation. Eight pedestrian access gates would be included around the Project Site for all-day pedestrian access to the Project's 5.4 acres of open space and 0.75 mile of landscaped trails. These gates would be locked between 9:00 p.m. and 7:00 a.m. 2. Regarding solar exposure or protection, the gymnasium building is specifically oriented to face the Los Angeles River, with wood slating and other similar surfaces allowing shallow winter sun to help heat and light the building but reduce cooling demand on hot days. The northern side of the gymnasium building would primarily consist of high-efficiency glass to provide ample sources of natural light. The net increase of 153 trees throughout the Project Site would allow for increased shade through more expansive canopy coverage. In addition, the Project's courtyards available to the public and any deciduous trees would allow for solar exposure during the cooler, winter season. 3. Regarding adjacency to pedestrian routes and other open spaces, the Project would be adjacent to the Zev Greenway and would provide direct pathway access to this Los Angeles River Greenway and at the intersection of the Zev Greenway and Coldwater Canyon Avenue. 4. Regarding appropriate plant and hard scape materials, the Project's landscaping, would consist entirely of native species and would be consistent with the requirements of the RIO District. Approximately 240 trees of the existing 421 inventoried on-and off-site trees would be removed by the Project, however, 393 new trees would be planted, resulting in a net increase of approximately 153 trees. <p>Therefore, the Project would not conflict with policies that establish the public open space standards that will guide the design of new public plazas and open spaces:</p>

SOURCE: ESA, 2022.

TABLE LU-6
CONSISTENCY OF THE PROJECT WITH POLICIES OF THE RIVER IMPROVEMENT OVERLAY DISTRICT
ORDINANCE INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policy	Would the Project Conflict?
Purpose of the RIO	
1. Support the goals of the Los Angeles River Revitalization Master Plan.	No Conflict. By providing a park and open space use, pedestrian trails, community use of recreational and athletic facilities when not in use by the School, and a landscaped trail link to the Zev Greenway, the Project would support the goals of the Los Angeles River Revitalization Plan (LARRMP) to develop parks and open space, and to provide pedestrian trails. The Project would support the goals of the LARRMP to revitalize the general environment of the Los Angeles River by providing improved natural habitat, improving existing water quality, as well as providing recreation and open space amenities in the RIO inner core. The Project would also provide an ADA-compliant off-site pedestrian ramp leading to the Zev Greenway at Coldwater Canyon Avenue. The Zev Greenway was developed to contribute to the vision of the LARRMP. The Project would also be in compliance with the requirements of the RIO District Ordinance, which was further developed to implement the LARRMP. Therefore, the Project would not conflict with policies that support the goals of the LARRMP.
2. Contribute to the environmental and ecological health of the City's watersheds.	No Conflict. The Project would reduce the volume of surface water runoff during storm events and improve the quality of surface water runoff into the Los Angeles River through the design and construction of a storm water 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, including the Project's building roofs. The capacity of the system would be one million gallons of water. Additionally, the runoff of pesticides, herbicides, and fungicides from the existing golf course operations would be eliminated. The improvement in water quality would contribute to the ecological health of the City's watersheds and the Los Angeles River. Therefore, the Project would not conflict with policies that contribute to the environmental and ecological health of the City's watersheds.
3. Establish a positive interface between river adjacent property and river parks and/or greenways	No Conflict. In contrast to current conditions that offer no linkage or interface with the Zev Greenway and no publicly-accessible park space, the Project would provide approximately 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 in proximity to the Los Angeles River. It would also remove tree species not approved under the RIO District Ordinance and replant native species that would create a more positive interface between the Project and the Zev Greenway. Therefore, the Project would not conflict with policies that establish a positive interface between river adjacent property and river parks and/or greenways.

TABLE LU-6
CONSISTENCY OF THE PROJECT WITH POLICIES OF THE RIVER IMPROVEMENT OVERLAY DISTRICT
ORDINANCE INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policy	Would the Project Conflict?
4. Promote pedestrian, bicycle and other multi-modal connection between the river and its surrounding neighborhoods	No Conflict. The Project would use shuttle buses between the Harvard-Westlake Upper School Campus and the Project Site. In addition, the Project Site would provide pedestrian access and bicycle parking and improve pedestrian access to the Zev Greenway through the installation of an ADA-compliant off-site pedestrian ramp at Coldwater Canyon Avenue, which would further connect pedestrian trails from the Project's open space and the Los Angeles River. The provision of bicycle parking on-site would facilitate bicycle travel between the Project Site and the surrounding community. Therefore, the Project would not conflict with policies that promote pedestrian, bicycle, and other multi-modal connection between the Los Angeles River and its surrounding neighborhoods.
5. Provide native habitat and support local species	No Conflict. The Project would remove and replace invasive plant species with native trees and shrubs throughout the Project Site. Native plant species would be provided as landscaping along the pedestrian trails, Project Site interior, and along the Zev Greenway. The Project would replace all invasive palm trees (i.e., the Mexican fan palm) at a 1:1 minimum ratio with RIO District-compliant trees (2:1 ratio for Mexican fan palms removed in the public right-of-way) and all other removed non-native trees would be replaced at a minimum 2:1 ratio with RIO District-compliant trees. The Project's tree replacement program would result in a net increase of 153 trees. The tree species would be native trees, the vast majority of which are also species sourced from the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes in compliance with the RIO District Ordinance. Other Project landscaping plantings, numbering in the tens of thousands, would also comprise native species and improve and expand upon existing limited foraging and wildlife habitat along the Zev Greenway. Therefore, the Project would not conflict with policies to provide native habitat and support local species.
6. Provide an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area.	No Conflict. The Project would provide 5.4 acres of publicly-accessible landscaped trails connecting to the adjacent Zev Greenway. Landscaping would include shrubs, trees water features, and seating for pedestrians within a natural setting. As such, the Project would not conflict with policies to provide an aesthetically pleasing environment for pedestrians accessing the river area.
7. Provide safe, convenient access to and circulation along the river.	No Conflict. The Project would provide over 0.75 mile of pathways connecting to the adjacent Zev Greenway, a public pathway following the north edge of the Los Angeles River. In addition, under the Project, an ADA-compliant off-site pedestrian ramp leading between Coldwater Canyon Avenue and the Zev Greenway would be installed at Coldwater Canyon

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Policy	Would the Project Conflict?
	Avenue. Therefore, the Project would provide safe, convenient access to and circulation along the river.
8. Promote the river identity of river adjacent communities.	No Conflict. The Project would provide landscaped open space and pathways connecting to the Zev Greenway, which follows the north bank of the Los Angeles River. The Project would comply with design regulations set forth in the RIO District Ordinance, including landscaping standards, habitat creation, screening, night lighting screening, and other regulations that would promote the river identity of the Project Site. Therefore, the Project would not conflict with policies to promote the river identity of Los Angeles River-adjacent communities.
9. Support the Low Impact Development Ordinance, the City's Irrigation Guidelines, and the Standard Urban Stormwater Maintenance Program.	No Conflict. The Project would provide an off-site (within the Whitsett Avenue and Valley Spring Lane intersection) and on-site stormwater runoff collection system that would exceed the City's LID Ordinance by reducing the rate of stormwater runoff. The Project would capture and treat surface water runoff from the Whitsett Avenue/Valley Spring Lane intersection and throughout the Project Site. Runoff would be stored in a one-million-gallon underground tank and filtered prior to use as on-site irrigation or released into the in-street storm system (during periods of heavy rainfall when onsite stored capacity has been reached). Such storage and filtering would improve water quality and reduce the rate of runoff during storm events. Therefore, the Project would not conflict with policies to support the LID Ordinance and the City's Irrigation Guidelines.
RIO Development Regulations (LAMC Section 13.17)	
Section 13.17 F.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 WatershedWise, 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.	No Conflict. The Project would implement an extensive tree and landscaping program that would provide for the removal of 240 trees of the existing 421 inventoried on-and off-site. Overall, the Project would plant 393 new trees, resulting in an overall net increase of 153 trees beyond existing conditions. The majority of removed trees (179 trees or 75 percent) are non-RIO District compliant (including 122 invasive Mexican fan palms). Of the 240 trees to be removed, 31 trees (the majority of which are Mexican fan palms) are located off-site in the public right-of-way, and no trees would be removed within the Zev Greenway Area (off-site). All other invasive palms (i.e., the Mexican fan palm) would be removed and replaced at a 1:1 minimum ratio with RIO District -compliant trees and all other removed non-native trees would be replaced at a minimum 2:1 ratio with RIO District -compliant trees. The Project would comply with LAMC Section 13.17 F.1 by having a minimum of 75% of the new landscape be native trees, plants and shrubs, or species defined as WatershedWise, or species listed in the Los Angeles County River Master Plan Landscaping Guidelines and Plant Palettes. Therefore, the

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Policy	Would the Project Conflict?
	Project would not conflict with the Rio Regulation contained in LAMC Section 13.17 F.1.
Section 13.17 F.2. Screening/Fencing:	No Conflict.
(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:	(a) Loading areas and off-street parking facilities would be located on the Project Site to the west of LAFD Station 78 and set back from the public right-of-way at Whitsett Avenue. The entrance to the subterranean garage, dropoff, roundabout, surface parking, and loading area would be accessed from Valleyheart Drive and located more than 260 feet to the west of Whitsett Avenue. Because these facilities would be located to the west of the fire station, they would not be obtrusively visible from Whitsett Avenue. Further, the surface parking area would be screened from Valleyheart Drive, which abuts the driveway entrance, by a landscaped drop-off circle. The landscape screening would not obstruct the view of a driver entering or leaving the parking lot, loading area, or parking structure, or the view from the street of entrances and exits. (See Figure II-6, <i>Conceptual Site Plan</i> , in Chapter II, <i>Project Description</i> , of this Draft EIR.)
(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	(i) The screening landscaping around the roundabout would be wider than five feet and a minimum of 2 feet high at the time of planting, which would form, within three years after time of planting, a continuous, unbroken, year round visual screen.
(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.	(ii) Although screening walls and fencing would be provided within the Project Site to separate public and private recreational uses and to attenuate recreational activity noise levels in the adjacent residential neighborhood, these are not related to screening the driveways, parking structure entrance, drop off, roundabout, or surface parking. Because of the need for noise attenuation, some barrier walls on the Project Site would exceed six feet, as reflected in the Project's requested discretionary entitlements (see Subsection 6, <i>Requested Permits and Approvals</i> , in Chapter II, <i>Project Description</i> , of this Draft EIR.
(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.	(b) Electrical transformers, mechanical equipment, water meters and other equipment will be interior to the parking structure or screened from public view.
(c) Exterior trash enclosures shall:	(c) Exterior trash enclosures:
(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;	(i) The trash enclosure, which would be located to the south of the parking structure near the parking lot and landscaped drop-off circle, would be enclosed within a landscaped wall that would exceed the height of the trash receptacles. The landscaped wall would

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<p>(ii) have a solid roof to deter birds and block views from adjacent properties;</p> <p>(iii) have solid metal doors that accommodate a lock and remain closed when not in use; and</p> <p>(iv) not be constructed of chain link or wood.</p> <p>(d) With the exception of single-family homes, all projects facing a street that crosses the river or terminates at the river or a river frontage road shall have all fences within the front or side yards visible from said street consistent with the fence designs identified in the Los Angeles County River Master Plan Landscape Guidelines.</p>	<p>complement the landscaping featured in the drop-off circle and parking lot.</p> <p>(ii) The trash enclosure would have a solid roof to deter birds and vermin and to block views from the surrounding area.</p> <p>(iii) The trash enclosure would have a solid metal door that would remained locked when not in use.</p> <p>(iv) The enclosure would be solid masonry wall, not constructed of chain link or wood.</p> <p>(v) Although not visible from the adjacent street (the enclosure would be blocked from view from adjacent Whitsett Avenue by the fire station), the wall enclosure would be consistent with the fence designs identified in the Los Angeles County River Master Plan Landscape Guidelines.</p> <p>Therefore, the Project would not conflict with policies related to screening and fencing of the RIO District Ordinance.</p>
<p>Section 13.17 F.3. Exterior Site Lighting.</p> <p>(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).</p> <p>(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.</p>	<p>No Conflict. The Project’s lighting plan would comply with the requirements of exterior lighting policies of the LAMC. The Project’s fixtures would be specifically designed with precise optics and integral shields to aid in controlling the light and preventing unwanted spill light, uplight, or glare. The Light Control Visor (shield) is specifically engineered such that the light from the fixture can reach the destination surface, in this case a sports field, pool, or tennis court, while the edges of the visor block any high angles which would impact neighboring sites. (See lighting analysis in Section IV.A, <i>Aesthetics</i>, of this Draft EIR.)</p> <p>Therefore, the Project would not conflict with exterior site lighting policies of this section of the LAMC.</p>

Section 13.17 F.4. Projects located partially or wholly within the Inner Core shall also conform to the following regulations:

- (a) Landscape Buffer. All Projects shall provide a 10-foot landscape buffer as measured from the Project's property line adjacent to the river except where a roadway is located within that 10 feet. New building structures or parking shall not be permitted within the 10-foot landscape buffer.
- (b) Fence. All fences located within 10 feet of the river corridor or a river frontage road street or any adjacent street shall be consistent with the fence designs identified in the Los Angeles County River Master Plan Landscape Guidelines. With the exception of single-family homes, all Projects shall be required to maintain a visual connection between the river corridor and/or frontage road and the abutting property.
- (c) Fence Height. All fences located less than 10 feet from the river shall be no higher than 6 feet in height. All fences located at the 10-foot landscape buffer setback line shall not exceed 10 feet in height. A fence located within a landscape buffer that is also a project's front yard shall be limited in height to 3 feet 6 inches.
- (d) Gates. All gates or fences located within 10 feet of the river or a river frontage road shall be consistent with the gate designs identified in the Los Angeles County River Master Plan Landscape Guidelines. The gate height shall be consistent with the adjacent fence height and the gate shall be designed so as not to encroach into either the river, street or public right-of-way when opened.
- (e) Noise. All projects subject to a conditional use permit for the sale or dispensing of alcoholic beverages, including beer and wine, shall incorporate noise-attenuating features (physical as well as operational) designed by a licensed acoustical sound engineer to assure that operational sounds shall not exceed 5 decibels above the existing measured or presumed ambient levels of the

No Conflict.

- (a) Landscape Buffer: The Project would provide a minimum 10-foot landscape buffer as measured from the Project's property line adjacent to the river except where a roadway is located within that 10 feet. No buildings, structures, or parking would be located within the minimum 10-foot landscape buffer. (See Figure II-6, *Conceptual Site Plan*, in Chapter II, *Project Description*, of this Draft EIR.)
- (b) Fence: As shown in the Project's proposed approvals, the Project would include landscaped fences up to a maximum of 10 feet in height along Whitsett Avenue and a maximum of 11 feet in height along Valley Spring Land and Bellaire Avenue for noise attenuation and privacy in the north sector of the Project Site. A three-foot-tall metal outer fence, complemented by additional landscaping, would be constructed around the entire perimeter of the Project Site, including along the Zev Greenway. This fence would be consistent with the Los Angeles County's Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. The Project would maintain a visual connection between the river corridor and uses within the Project Site, such as the gymnasium Community Room and courtyards.
- (c) Fence Height: A three-foot-tall metal outer fence, complemented by additional landscaping, would be constructed around the perimeter of the Project Site, including along the Zev Greenway near the river. Therefore, the Project would not exceed the Ordinances fence height requirement that any fences located less than 10 feet from the river would be no higher than 6 feet in height and no fences located at the 10-foot landscape buffer setback line would exceed 10 feet in height.
- (d) Gates: All gates or fences located within 10 feet of the river or the Zev Greenway shall be consistent with the gate designs identified in the Los Angeles County River Master Plan Landscape Guidelines. The gate height would be consistent with the adjacent fence height and the gate would be designed so as not to encroach into the Zev Greenway when opened.
- (e) Noise: The Project is not seeking a conditional use permit for the sale or dispensing of alcoholic beverages, including beer and wine and, as such, this requirement would not be applicable.
- (f) River Access: The Project would include a landscaped pathway between its public open space trails and the Zev Greenway. In addition, the Project would provide for an off-site, ADA-compliant pedestrian ramp for the Zev Greenway at Coldwater Canyon Avenue for improved public access to the river. All public access to the Los Angeles River (via the Zev Greenway) would be ADA-compliant. The gates would also be accessible for bicycle entry to bicycle parking areas. However, because trails are for pedestrian use, bicycles would not be ridden throughout the Project Site.
- (g) Riverfront Door: The Project would provide primarily a landscaped buffer and pathways between the Los Angeles

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<p>property line(s) of properties on the opposite bank.</p> <p>(f) River Access.</p> <p style="padding-left: 20px;">(i) With the exception of single-family homes, all river adjacent projects that partially or wholly abut the river shall have Americans with Disabilities Act compliant access gates from their property to the river. The gates shall also be accessible for bicycle entry. Access may be controlled and limited to residents, employees and/or visitors of the project.</p> <p>(g) Riverfront Door. All projects located either adjacent to the river corridor or frontage road shall include a riverfront door visible to, and accessible from, the river corridor or frontage road.</p>	<p>River (Zev Greenway) and the Project Site. However, a gate between the Zev Greenway and the Project Site, midway along the southern boundary between the Project Site and the Zev Greenway, would serve as a doorway to the Los Angeles River from the Project Site. A second (off-site) entrance for the public to the Los Angeles River is located at Whitsett Avenue. The on-site gateways would be marked, highly visible, landscaped, and accessible to pedestrians. Because trails within the Project Site, as with the Zen Greenway, are for pedestrian use only, no mounted bicycles would be permitted within the Project Site. However, parking for bicycles would be provided within the Project Site.</p>

SOURCE: ESA, 2022.