



Because life is good.

December 9, 2020

Sent via email

Jason McCrea City of Los Angeles Department of City Planning 221 N. Figueroa Street, Room 1350 Los Angeles, California, 90012 Jason.McCrea@lacity.org

Re: Comments on Notice of Preparation for Retreat at Benedict Canyon Project (ENV-2018-1509-EIR)

Dear Jason,

On behalf of the Center for Biological Diversity, we are writing to express our strong opposition to the proposed Retreat at Benedict Canyon Project ("Project"). The Project would result in loss of native biodiversity and increased wildfire risk while providing no benefits to City residents. The Project also contradicts Mayor Eric Garcetti's commitment to the Green New Deal which pushes for a more sustainable city that protects the environment, reduces greenhouse gas emissions, and provides equal access for all communities to open space.

The Center for Biological Diversity ("Center") is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles.

I. The Project may have significant impacts on wildlife movement and habitat connectivity

The California Environmental Quality Act ("CEQA") requires an Environmental Impact Report ("EIR") to provide decision-making bodies and the public with detailed information about the effect a proposed project is likely to have on the environment, to list ways in which the significant effects of a project might be minimized, and to indicate alternatives to the project. (Pub. Res. Code § 21061.) In particular, CEQA requires a lead agency to mitigate to the extent feasible significant impacts, including a significant cumulative climate change impact. (CEQA Guidelines § 15064.4.)

If the City does move forward with preparing an EIR, the EIR must adequately assess and mitigate the Project's impacts to local, regional, and global wildlife movement and habitat connectivity. Roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorlyplanned development and roads can affect an animal's behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Mitsch and Wilson 1996; Trombulak and Frissell 2000; van der Ree et al. 2011; Brehme et al. 2013; Haddad et al. 2015; Marsh and Jaeger 2015; Ceia-Hasse et al. 2018). For example, habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015), increase local extinction risk in amphibians and reptiles (Cushman 2006; Brehme et al. 2018), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al. 2010; Loss et al. 2014; Kantola et al. 2019), and alter pollinator behavior and degrade habitats (Trombulak and Frissell 2000; Goverde et al. 2002; Aguilar et al. 2008). Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al. 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term (Damschen et al. 2019). In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to allow for range shifts and species migrations as climate changes (Heller and Zavaleta 2009; Cushman et al. 2013; Krosby et al. 2018). Loss of wildlife connectivity decreases biodiversity and degrades ecosystems.

Edge effects of development in and adjacent to open space will likely impact key, wideranging predators, such as mountain lions and bobcats (Crooks 2002; Riley et al. 2006; Delaney et al. 2010; Lee et al. 2012; Smith et al. 2015; Vickers et al. 2015; Smith et al. 2017; Wang et al. 2017), as well as smaller species with poor dispersal abilities, such as song birds, small mammals, and herpetofauna (Cushman 2006; Slabbekoorn and Ripmeester 2008; Benítez-López et al. 2010; Kociolek et al. 2011). Limiting movement and dispersal can affect species' ability to find food, shelter, mates, and refugia after disturbances like fires or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. Negative edge effects from human activity, such as traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency, have been found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems (Environmental Law Institute 2003)

It is important that the EIR consider corridor redundancy (*i.e.* the availability of alternative pathways for movement) because it allows for improved functional connectivity and resilience. Compared to a single pathway, multiple connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008). In addition, corridor redundancy provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or

wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008; Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008).

Corridor redundancy is critical when considering the impacts of climate change on wildlife movement and habitat connectivity. Climate change is increasing stress on species and ecosystems, causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes, and increasing species extinction risk (Warren et al. 2011). A 2016 analysis found that climate-related local extinctions are already widespread and have occurred in hundreds of species, including almost half of the 976 species surveyed (Wiens 2016). A separate study estimated that nearly half of terrestrial non-flying threatened mammals and nearly one-quarter of threatened birds may have already been negatively impacted by climate change in at least part of their distribution (Pacifici et al. 2017). A 2016 meta-analysis reported that climate change is already impacting 82 percent of key ecological processes that form the foundation of healthy ecosystems and on which humans depend for basic needs (Scheffers et al. 2016). Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Parmesan and Yohe 2003; Root et al. 2003; Parmesan 2006; Chen et al. 2011; Maclean and Wilson 2011; Warren et al. 2011; Cahill et al. 2012).

When assessing impacts to wildlife movement and habitat connectivity, the City must analyze the Project's potential impacts to riparian corridors. Riparian ecosystems have long been recognized as biodiversity hotspots performing important ecological functions in a transition zone between freshwater systems and upland habitats. Many species that rely on these aquatic habitats also rely on the adjacent upland habitats (e.g., riparian areas along streams, and grassland habitat adjacent to wetlands). In fact, 60% of amphibian species, 16% of reptiles, 34% of birds and 12% of mammals in the Pacific Coast ecoregion depend on riparian-stream systems for survival (Kelsey and West 1998). Many other species, including mountain lions and bobcats, often use riparian areas and natural ridgelines as migration corridors or foraging habitat (Dickson et al, 2005; Hilty & Merenlender, 2004; Jennings & Lewison, 2013; Jennings & Zeller, 2017). Additionally, fish rely on healthy upland areas to influence suitable spawning habitat (Lohse et al. 2008), and agricultural encroachment on these habitats and over-aggressive removal of riparian areas have been identified as a major driver of declines in freshwater and anadromous fish (e.g., Stillwater Sciences 2002; Lohse et al. 2008; Moyle et al. 2011). Therefore, buffers that allow for connectivity between the aquatic resource and upland habitat is vital for many species to persist.

It is estimated that 90-95% of historic riparian habitat in the state has been lost (Bowler 1989; Riparian Habitat Joint Venture 2009). Using 2002 land cover data from CalFire, the Riparian Habitat Joint Venture estimated that riparian vegetation makes up less than 0.5% of California's total land area at about 360,000 acres (Riparian Habitat Joint Venture 2004). This is alarming because riparian habitats perform a number of biological and physical functions that benefit wildlife, plants, and humans, and loss of what little is left will have severe, harmful impacts on special-status species, overall biodiversity, and ecosystem function. California cannot afford to lose more riparian corridors.

A literature review found that recommended buffers for wildlife often far exceeded 100 meters (~325 feet), well beyond the largest buffers implemented in practice (Robins 2002). For example, Kilgo et al. ⁽¹⁹⁹⁸⁾ recommend more than 1,600 feet of riparian buffer to sustain bird diversity. In addition, amphibians, which are considered environmental health indicators, have been found to migrate over 1,000 feet between aquatic and terrestrial habitats through multiple life stages (Semlitsch and Bodie 2003; Trenham and Shaffer 2005; Cushman 2006; Fellers and Kleeman 2007). Accommodating the more long-range dispersers is vital for continued survival of species populations and/or recolonization following a local extinction (Semlitsch and Bodie 2003; Cushman 2006). In addition, more extensive buffers provide resiliency in the face of climate change-driven alterations to these habitats, which will cause shifts in species ranges and distributions (Cushman et al., 2013; Heller & Zavaleta, 2009; Warren et al., 2011). This emphasizes the need for sizeable riparian and upland buffers around streams and wetlands in and adjacent to the Project area, as well as connectivity corridors between heterogeneous habitats. Again, the EIR must adequately assess and mitigate impacts to local, regional, and global wildlife movement and habitat connectivity.

It is widely recognized that the continuing fragmentation of habitat by humans threatens biodiversity and diminishes our (humans, plants, and animals) ability to adapt to climate change. In a report for the International Union for Conservation of Nature (IUCN), world-renown scientists from around the world stated that "[s]cience overwhelmingly shows that interconnected protected areas and other areas for biological diversity conservation are much more effective than disconnected areas in human-dominated systems, especially in the face of climate change" and "[i]t is imperative that the world moves toward a coherent global approach for ecological connectivity conservation, and begins to measure and monitor the effectiveness of efforts to protect connectivity and thereby achieve functional ecological networks" (Hilty et al. 2020).

Given the potential for the Project to fragment and destroy habitat and riparian areas, the Center urges the City not to move forward with the Project as proposed. To the extend the City nonetheless decides to further consider the Project, the Center urges the adoption of mitigation measures that address the needs of the target species. It is important to consider that different species have different behaviors and needs that affect how they move. For example, smaller species with poor dispersal abilities, like rodents and herpetofauna, would require more frequent intervals of crossings compared to larger wide-ranging species, like mountain lions or coyotes, to increase their chances of finding a crossing. Gunson et al. ⁽²⁰¹⁶⁾ recommend that crossing structures generally be spaced about 300m (~0.19mi) apart for small animals when transportation infrastructure bisects large expanses of continuous habitat, though they recognize that some amphibians may need more frequent crossings no more than 50m (~0.03mi) apart. And for many amphibian and reptile species, undercrossings should have grated tops so that the light and moisture inside the crossings are similar to that of the ambient environment. Therefore, multiple crossings designed for different target species may be required. In-depth analyses that include on-the-ground movement studies of which species are moving in the area and their home range area, habitat use, and patterns of movement are needed to determine how to best implement such crossings. In addition, associated crossing infrastructure (e.g., exclusionary fencing appropriate for target species, berms to buffer crossings from sound and light) should be included to improve chances of wildlife using crossings, and such crossings and associated infrastructure should be

designed and built in consultation with local and regional experts, including agency biologists. And to improve the effectiveness of any wildlife crossings, there should be protected habitat on both sides of the crossing; therefore, mitigation should also include acquiring unprotected lands on both sides of the roads where a wildlife crossing would be implemented, again, in consultation with local conservation organizations and stakeholders, and preserving and managing those lands in perpetuity to ensure that the wildlife crossings and associated infrastructure remain functional over time. Given that impacts of noise, light, and vibration can affect the use of wildlife crossings, even if crossings are designed with adequate parameters and fencing, the crossings should be built with wildlife responsive design; crossings should have sound and light berms to minimize light and sound at the entrance/exit as well as on/in/under the crossings structures, and they should be well-maintained on both sides of the crossing for animals to use them (Shilling 2020; Vickers 2020).

II. The Project may harm struggling local mountain lions and other native animals and plants

There is ample scientific evidence that indicates mountain lion populations in Southern California and along the Central Coast are imperiled and that human activities and land use planning that does not integrate adequate habitat connectivity can have adverse impacts on mountain lions. Continued habitat loss and fragmentation has led to 10 genetically isolated populations within California (Gustafson et al. 2018). There are six identified mountain lion populations in the Southern California and Central Coast Evolutionarily Significant Unit ("ESU"), and several are facing an extinction vortex due to high levels of inbreeding, low genetic diversity, high human-caused mortality rates from car strikes on roads, depredation kills, rodenticide poisoning, poaching, disease, and increased human-caused wildfires (Ernest et al. 2003; Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015; Benson et al. 2016; Gustafson et al. 2018; Benson et al. 2019).

The effective population sizes of the six populations within the ESU range from 4 to 56.6 (Gustafson et al. 2018; Benson et al. 2019). An effective population size (N_e) of 50 is assumed to be sufficient to prevent inbreeding depression over five generations, while an effective population size of 500 is considered sufficient to retain evolutionary potential in perpetuity (Traill et al. 2010; Frankham et al. 2014). Five of the six population size anywhere near 500, which indicates that these populations are at serious risk of becoming extirpated. Low genetic diversity and high human-caused mortalities are driving local mountain lions in the Santa Monica mountains towards an extinction vortex (Gustafson et al. 2018). Scientists predict that the Santa Monica and Santa Ana populations, with estimated effective population sizes of 6 and 4, respectively, are likely to become extinct within 50 years if gene flow with other mountain lion populations is not improved (Benson et al. 2016; Gustafson et al. 2018; Benson et al. 2019). This is detailed in the Center's petition to the California Fish and Game Commission to protect Southern California and Central Coast mountain lions under the California Endangered Species Act (Yap et al. 2019).

Numerous studies highlight the impacts of human activities on mountain lions. For example, Shilling et al. (2019) reported 299 observed roadkill mountain lions throughout the

state from 2015 to 2018, but these deaths are likely underreported. CDFW biologist Justin Dellinger estimates there could be 200 puma deaths on roads every year (Price 2020). And a recent UC Davis special report identified a 58% reduction in mountain lion road mortalities after a 71% decrease in road use due to COVID-19 pandemic "stay-at-home" orders (Nguyen et al. 2020). This report highlights how roads and traffic are deadly barriers to puma movement and gene flow.

In addition to causing direct mortality in pumas, human activities also alter these large carnivores' behavior in ways that likely further impede important movement and gene flow. For example, Smith et al. (2017) found that mountain lions are so fearful of humans and noise generated by humans that they will abandon the carcass of a deer and forgo the feeding opportunity just to avoid humans.¹ The study concluded that even "non-consumptive forms of human disturbance may alter the ecological role of large carnivores by affecting the link between these top predators and their prey" (Smith et al. 2017). In addition, mountain lions have been found to respond fearfully upon hearing human vocalizations, avoiding the area and moving more cautiously when hearing humans (Smith et al. 2017; Suraci et al. 2019).

Other studies have demonstrated that mountain lion behavior is impacted when exposed to other evidence of human presence, such as lighting or vehicles/traffic (Wilmers et al. 2013; Smith et al. 2015; Wang et al. 2017). In addition, preliminary results from study by researchers at UC Davis and University of Southern California, as well as those by other researchers, suggest that the light, noise, and other aspects of highways can have negative impacts on wildlife numbers and diversity near the highways (Shilling 2020; Vickers 2020). The researchers found a significant difference between species richness and species type (mammals, including mountain lions), with lower richness and fewer species at crossing structures compared to background areas 1 km away from the roads (Shilling 2020). They also found that as traffic noises surpassed 60 dBC, the number of visits by small to large mammals decreased and most of the species in their study avoid traffic noise (Shilling 2020). It is clear that different species have variable sensitivities to noise and light associated with development and transportation infrastructure; this can lead to changes in species distributions near roads and development, which can have ecosystem-level impacts (e.g., Suraci et al. 2019). Thus, roads, traffic, and development have negative impacts on puma survival and behavior, which can reduce the genetic health of populations and ultimately diminish their chances of long-term survival.

Yovovich et al. (2020) further documented the impacts of human activities on mountain lions in the Santa Cruz Mountains, specifically on communication and reproductive behaviors important for their survival. Males use scrapes to delineate territories as well as attract potential mates (Allen et al. 2015; Allen et al. 2016), and the males in the study preferred to use relatively flat areas away from human influence as scrape habitat (Yovovich et al. 2020). Similarly, when nursing females (with kittens less than 8 weeks old) shrank their home ranges to an average of 9 km² while their young were most vulnerable, they also selected undeveloped lands away from human disturbance, opting for habitat with protective cover and sufficient water and prey availability (Yovovich et al. 2020). The loss of adequate undisturbed communication and nursery

¹ See also Sean Greene, "How a fear of humans affects the lives of California's mountain lions," Los Angeles Times (June 27, 2017), available at <u>http://beta.latimes.com/science/sciencenow/la-sci-sn-pumas-human-noise-20170627-story.html</u>.

habitat could disrupt important communication and reproductive behaviors that facilitate social structure and overall survival. The authors predicted that future development within the Santa Cruz Mountains could reduce nursery and communication habitat by 20% and 50%, respectively, while further fragmenting the landscape. Such patterns likely extend to other regions within the proposed Southern California/Central Coast ESU.

There are numerous scientific studies that provide insights on the profound impacts human activities and infrastructure have on mountain lion survival, and they emphasize the need to adequately assess and mitigate impacts to these CESA candidate species in the Project area. These studies add to the accumulating evidence that mountain lions require a habitat mosaic that provides sufficient room to roam away from human-disturbed areas and connected to expansive, intact, heterogeneous habitats (Beier et al. 1995; Dickson and Beier 2002; Dickson et al. 2005; Kertson et al. 2011; Zeller et al. 2017). Continued construction of roads and development in mountain lion habitat with little regard for their movement and behavioral needs has direct and indirect lethal and sublethal impacts that threaten the persistence of Southern California and Central Coast puma populations.

Mountain lions are a key indicator species of wildlife connectivity and healthy ecosystems. As the last remaining wide-ranging large carnivore in the region, the ability to move through large swaths of interconnected habitat is vital for genetic connectivity and their longterm survival. Local extinction of mountain lions in the region could have severe ecological consequences. Many scavengers, including many raptors, foxes, and numerous insects, would lose a reliable food source (Ruth and Elbroch 2014; Elbroch et al. 2017; Barry et al. 2019). Fish, birds, amphibians, reptiles, rare native plants, and butterflies could potentially diminish if this apex predator were lost (Ripple and Beschta 2006; Ripple and Beschta 2008; Ripple et al. 2014). Loss of this ecosystem engineer and important predator-prey dynamics could have cascading effects on other plant and animal species, potentially leading to a decrease in biodiversity and diminished overall ecosystem function (Ripple et al. 2014; Elbroch et al. 2017; Barry et al. 2019; Benson et al. 2020b).

The Project would further harm the already-imperiled Santa Monica mountain lion population by imposing additional barriers on connectivity, destroying habitat, and increasing noise, traffic, and human disturbance. We urge the City to reject this harmful and unnecessary development proposal.

III. The Project would increase wildfire risk and endanger existing residents

Continued development in California's highly fire-prone Mediterranean shrublands and grasslands results in the continual release of large amounts of carbon into the atmosphere by removing significant carbon sinks, increasing wildfire frequency, and degrading habitats and ecosystem function. The past few decades have seen significant housing growth near natural areas in California's wildland urban interface (*i.e.*, the transition zone between human development and wildlands), including more than one million homes built between 1990 and 2010 (Radeloff et al. 2018). And scientists project that at least 640,000 to 1.2 million new homes will be built in the state's highest wildfire risk areas by 2050 under current land use practices (Mann et al. 2014). In addition, rampant fire suppression and logging since European

colonization have led to an increase in wildfire intensity and spread when fires ignite, which leads to compounding carbon release events (Bradley et al. 2016; Morrison 2019; Hanson 2020).

Almost all (95-97%) wildfires in California's Mediterranean regions are caused by humans or human infrastructure in the wildland urban interface (Syphard et al. 2007; Balch et al. 2017; Keeley and Syphard 2018; Radeloff et al. 2018; Syphard and Keeley 2019; Keeley and Syphard 2020; Syphard and Keeley 2020). For example, the 2019 Kincade Fire, 2018 Camp and Woolsey fires, and 2017 Tubbs and Thomas fires were sparked by powerlines or electrical equipment. And although many of the 2020 fires were sparked by a lightning storm, the Apple Fire was caused by sparks from a vehicle, the El Dorado Fire was caused by pyrotechnics at a gender-reveal party, and electrical equipment is suspected to have ignited the Silverado and Zogg fires. Expanding development in high fire-prone areas leads to increased risk of human ignitions while placing more people in harm's way when fires ignite (Keeley and Syphard 2019).

Progressively hotter, drier, and windier conditions and more extreme weather events due to climate change are making it easier for wildfires to ignite and spread. The number of days with extreme fire weather conditions in California has doubled since 1980, and further climate change will amplify that trend (Goss et al. 2020). Although wildfires are a natural and necessary process in California's landscapes and much of the state's diverse shrubland and grassland communities in its Mediterranean ecosystems are adapted to wildfire to varying degrees, increases in fire frequency in these systems disrupt the historical fire regimes they have evolved with. This can lead to the establishment of more flammable non-native grasses that increase fire threat over time (Keeley 2005; Keeley 2006; Syphard et al. 2009; Safford and Van de Water 2014; Syphard et al. 2018; Syphard et al. 2019) and have less carbon storage capacity than native vegetation communities (Koteen et al. 2011). Other disturbance and associated edge effects from roads and development, such as nitrogen deposition from vehicle emissions, can also lead to the establishment of such invasive grasses (Keeley et al. 2011) as well as reduced native biodiversity (Hernández et al. 2016). Thus, continued development in fire-prone wildlands ultimately perpetuates a feedback loop of increased carbon release and wildfire that fuels climate change while eliminating and degrading California's Mediterranean shrubland and grassland communities and their carbon storage potential. Southern California is especially vulnerable with development pressures to extend the wildland urban interface into adjacent high fire-prone shrublands and grasslands. The Project would likely increase the risk of wildfire and contribute to this feedback loop, thereby further degrading local ecosystems.

IV. The EIR must thoroughly analyze and mitigate the Project's anticipated greenhouse gas emissions

A strong, international scientific consensus has established that human-caused climate change is causing widespread harms to human society and natural systems, and climate change threats are becoming increasingly dangerous. In a 2018 *Special Report on Global Warming of1.5°C* from the Intergovernmental Panel on Climate Change (IPCC), the leading international scientific body for the assessment of climate change describes the devastating harms that would occur at 2°C warming, highlighting the necessity of limiting warming to 1.5°C to avoid catastrophic impacts to people and life on Earth. The report provides overwhelming evidence that climate hazards are more urgent and more severe than previously thought, and that

aggressive reductions in emissions within the next decade are essential to avoid the most devastating climate change harms.

The impacts of climate change will be felt by humans and wildlife. In California, climate change will transform our climate, resulting in such impacts as increased temperatures and wildfires, and a reduction in snowpack and precipitation levels and water availability. In light of inadequate action on the national level, California has taken steps through legislation and regulation to fight climate change and reduce statewide GHG emissions. (Health & Saf. Code § 38550; *see also* Executive Order B-30-15 (2015); Executive Order S-3-05 (2005); Executive Order B-55-18 (2018).) The Legislature also passed S.B. 100 which requires renewables to account for 60 percent of electricity sales in 2030. Enforcement and compliance with these state-level actions are essential to help stabilize the climate and avoid catastrophic impacts to our environment. However, regional and municipal agencies also have a vital role in reducing our GHG emissions and fighting the climate crisis. Fundamental changes and hard choices in land use planning for the future by local land use agencies will be necessary to fully address and meet the state GHG emissions reduction goals.

Therefore, if the City concludes the Project will have significant GHG impacts, the Center urges the adoption of mitigation measures to reduce GHG emissions to net zero, with a priority given to direct emission reduction measures and on-site mitigation measures. The EIR must also account for greenhouse gas impacts of increased tourism and/or travel to the Project, and mitigate those impacts to the greatest extent feasible. If offsets are used as GHG mitigation, they should only be used when all direct emission reduction measures and on-site mitigation options are exhausted. Any offsets should be tied to local projects and allow for local direct investments that help the surrounding community through the creation of local jobs, reduction in nearby air pollution, and improve impacted infrastructure.

The EIR must also account for the climate impacts of removing native vegetation. The removal and degradation chaparral- and sage scrub-dominated landscapes would result in high amounts of carbon release. Above-ground biomass of these shrub communities were found to be as high as 3461 g/m², with the amount of carbon stored increasing with the age of the stand (Bohlman et al. 2018). In addition, a substantial amount of carbon may be stored belowground in their roots and in the microbial communities and symbiotic fungi that are associated with the roots (Bohlman et al. 2018; Kravchenko et al. 2019; Soudzilovskaia et al. 2019). The removal and degradation of these systems have been found to result in the loss of both above- and belowground carbon storage (e.g., Austreng 2012). And although these systems are often overlooked in the fight against climate change, they are adapted to hot and dry weather conditions and have been found to be resilient to drought (Luo et al. 2007; Vicente-Serrano et al. 2013), which makes them an untapped opportunity to sequester more carbon as the climate crisis becomes exceedingly urgent. Therefore, the City should be prioritizing the preservation of carbon in existing ecosystems instead of releasing more greenhouse gases and destroying habitats with carbon storage potential for a Project that would destroy native ecosystems and exacerbate traffic congestion and air pollution.

In a November 2018 report, the California Air Resources Board concluded that California is currently not on track to meet its greenhouse gas reduction targets, primarily due to GHG

emissions from the transportation sector. Projects such as the one proposed in the NOP have the potential to widen the gap between where California needs to be to tackle the climate crisis and where it is headed. Therefore, the Center urges the City to take a hard and thorough look at the Project's anticipated GHG emissions, as well as associated air quality, traffic, and transportation impacts, when preparing the EIR.

V. Conclusion

We are in the midst of a global extinction crisis, with species going extinct at a rate of over 1,000 times the background rate and more than one million species on track to become extinct over the coming decades. The City Council should work to safeguard L.A.'s biodiversity and remaining wildlife habitat instead allowing for further destruction of these irreplaceable resources for a mansions and a luxury hotel. Because the Project will further degrade connectivity for already-imperiled mountain lions and increase wildfire risk while providing no benefits to City residents, we ask the City Council to reject this unnecessary and harmful proposal.

Thank you for the opportunity to submit comments on the Project. Please include the Center on your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the email addresses listed below.

Sincerely,

J.P. Rose Staff Attorney Center for Biological Diversity 660 S. Figueroa Street, Suite 100 Los Angeles, California 90017 jrose@biologicaldiversity.org



Tiffany Yap, D.Env/PhD Senior Scientist, Wildlife Corridor Advocate Center for Biological Diversity 1212 Broadway, Suite 800 Oakland, California 94612 tyap@biologicaldiversity.org

Because life is good.

CENTER for BIOLOGICAL DIVERSITY

cc: **Council Members:** Joe Buscaino, councilmember.buscaino@lacity.org Bob Blumenfield, councilmember.blumenfield@lacity.org Mike Bonin, councilmember.bonin@lacity.org Gil Cedillo, gilbert.Cedillo@lacity.org Marqueece Harris-Dawson, councilmember.harris-dawson@lacity.org Paul Krekorian, councilmember.Krekorian@lacity.org Paul Koretz, paul.koretz@lacity.org John Lee, councilmember.lee@lacity.org Nury Martinez, councilmember.martinez@lacity.org Mitch O'Farrell, councilmember.ofarrell@lacity.org Curren Price; councilmember.price@lacity.org Monica Rodriguez, councilmember.rodriguez@lacity.org David Ryu, david.ryu@lacity.org Herb Wesson, councilmember.wesson@lacity.org Mike Shull, General Manager of the Department of Recreation and Parks Michael.A.Shull@lacity.org Eduardo Soriano Hewitt, District 14 Chief of Staff, Eduardo.Soriano.Hewitt@lacity.org

References

(Provided via OneDrive)

- Aguilar, R., Quesada, M., Ashworth, L., Herrerias-Diego, Y., & Lobo, J. (2008). Genetic consequences of habitat fragmentation in plant populations: Susceptible signals in plant traits and methodological approaches. *Molecular Ecology*, *17*, 5177–5188.
- Allen, M. L., Wittmer, H. U., Houghtaling, P., Smith, J., Elbroch, L. M., & Wilmers, C. C. (2015). The role of scent marking in mate selection by female pumas (Puma concolor). *PLoS ONE*, 10.
- Allen, M. L., Yovovich, V., & Wilmers, C. C. (2016). Evaluating the responses of a territorial solitary carnivore to potential mates and competitors. *Scientific Reports*, 6.
- Austreng, A. C. (2012). *The carbon budget impact of sagebrush degradation. Master's Thesis.* Boise state University.
- Balch, J. K., Bradley, B. A., Abatzoglou, J. T., Nagy, R. C., Fusco, E. J., & Mahood, A. L. (2017). Human-started wildfires expand the fire niche across the United States. *Proceedings* of the National Academy of Sciences, 114(11), 2946–2951.
- Barry, J. M., Elbroch, L. M., Aiello-lammens, M. E., Sarno, R. J., Seelye, L., Kusler, A., & Quigley, H. B. (2019). Pumas as ecosystem engineers: ungulate carcasses support beetle assemblages in the Greater Yellowstone Ecosystem. *Oecologia*, (189), 577–586.
- Beier, P., Choate, D., & Barrett, R. H. (1995). Movement patterns of mountain lions during different behaviors. *Journal of Mammalogy*, 76(4), 1056–1070.
- Benítez-López, A., Alkemade, R., & Verweij, P. A. (2010). The impacts of roads and other infrastructure on mammal and bird populations: A meta-analysis. *Biological Conservation*, *143*, 1307–1316.
- Benson, J. F., Mahoney, P. J., Sikich, J. A., Serieys, L. E. K., Pollinger, J. P., Ernest, H. B., & Riley, S. P. D. (2016). Interactions between demography, genetics, and landscape connectivity increase extinction probability for a small population of large carnivores in a major metropolitan area. *Proceedings of the Royal Society B: Biological Sciences*, 283(1837), 20160957.
- Benson, J. F., Mahoney, P. J., Vickers, T. W., Sikich, J. A., Beier, P., Riley, S. P. D., ... Boyce, W. M. (2019). Extinction vortex dynamics of top predators isolated by urbanization. *Ecological Applications*, 29(3), e01868.
- Benson, J. F., Mahoney, P. J., Vickers, T. W., Sikich, J. A., Beier, P., Riley, S. P. D., ... Boyce, W. M. (2020). Conserving ecological roles of top predators in isolated mountains. *Ecological Applications*, 30(1), e02029.
- Bohlman, G. N., Underwood, E. C., & Safford, H. D. (2018). Estimating Biomass in California's Chaparral and Coastal Sage Scrub Shrublands. *Madroño*, 65(1), 28–46.
- Bowler, P. A. (1989). Riparian woodland: An endangered habitat in southern California. Proceedings of the 15th Annual Symposium Southern California Botanists, 3, 80–97.
- Bradley, C. M., Hanson, C. T., & DellaSala, D. A. (2016). Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? *Ecosphere*, *7*(10), e01492.
- Brehme, C. S., Hathaway, S. A., & Fisher, R. N. (2018). An objective road risk assessment method for multiple species: ranking 166 reptiles and amphibians in California. *Landscape Ecology*, *33*, 911–935.

- Brehme, C. S., Tracey, J. A., Clenaghan, L. R. M. C., & Fisher, R. N. (2013). Permeability of roads to movement of scrubland lizards and small mammals. *Conservation Biology*, 27(4), 710–720.
- Cahill, A. E., Aiello-Lammens, M. E., Fisher-Reid, M. C., Hua, X., Karanewsky, C. J., Ryu, H. Y., ... Wiens, J. J. (2012). How does climate change cause extinction? *Proceedings of the Royal Society B: Biological Sciences*, 280, 20121890.
- Ceia-Hasse, A., Navarro, L. M., Borda-de-Água, L., & Pereira, H. M. (2018). Population persistence in landscapes fragmented by roads: Disentangling isolation, mortality, and the effect of dispersal. *Ecological Modelling*, *375*, 45–53.
- Chen, I.-C., Hill, J. K., Ohlemüller, R., Roy, D. B., & Thomas, C. D. (2011). Rapid range shifts of species associated with high levels of climate warming. *Science*, *333*, 1024–1026.
- Crooks, K. R. (2002). Relative sensitivities of mammalian carnivores to habitat fragmentation. *Conservation Biology*, *16*(2), 488–502.
- Cushman, S. A. (2006). Effects of habitat loss and fragmentation on amphibians: A review and prospectus. *Biological Conservation*, *128*, 231–240.
- Cushman, S. A., McRae, B., Adriaensen, F., Beier, P., Shirley, M., & Zeller, K. (2013).
 Biological corridors and connectivity. In D. W. Macdonald & K. J. Willis (Eds.), *Key Topics in Conservation Biology 2* (First Edit, pp. 384–403). John Wiley & Sons, Ltd.
- Damschen, E. I., Brudvig, L. A., Burt, M. A., Jr, R. J. F., Haddad, N. M., Levey, D. J., ... Tewksbury, J. J. (2019). Ongoing accumulation of plant diversity through habitat connectivity in an 18-year experiment. *Science*, 365(6460), 1478–1480.
- Delaney, K. S., Riley, S. P. D., & Fisher, R. N. (2010). A rapid, strong, and convergent genetic response to urban habitat fragmentation in four divergent and widespread vertebrates. *PLoS ONE*, 5(9), 1–11.
- Dickson, B. G., & Beier, P. (2002). Home-range and habitat selection by adult cougars in Southern California. *The Journal of Wildlife Management*, 66(4), 1235–1245.
- Dickson, B. G., Jennes, J. S., & Beier, P. (2005). Influence of Vegetation, Topography, and Roads on Cougar Movement in Southern California. *Journal of Wildlife Management*, 69(1), 264–276.
- Elbroch, L. M., O'Malley, C., Peziol, M., & Quigley, H. B. (2017). Vertebrate diversity benefiting from carrion provided by pumas and other subordinate, apex felids. *Biological Conservation*, *215*, 123–131.
- Environmental Law Institute. (2003). *Conservation thresholds for land use planners*. *Environmental Law*.
- Ernest, H. B., Boyce, W. M., Bleich, V. C., May, B., Stiver, S. J., & Torres, S. G. (2003). Genetic structure of mountain lion (Puma concolor) populations in California. *Conservation Genetics*, (4), 353–366.
- Ernest, H. B., Vickers, T. W., Morrison, S. A., Buchalski, M. R., & Boyce, W. M. (2014). Fractured genetic connectivity threatens a Southern California puma (Puma concolor) population. *PLoS ONE*, 9(10).
- Fellers, G. M. and, & Kleeman, P. M. (2007). California Red-Legged Frog (Rana draytonii) Movement and Habitat Use : Implications for Conservation. *Journal of Herpetology*, 41(2), 276–286.
- Frankham, R., Bradshaw, C. J. A., & Brook, B. W. (2014). Genetics in conservation management: Revised recommendations for the 50/500 rules, Red List criteria and population viability analyses. *Biological Conservation*, 170, 56–63.

- Goss, M., Swain, D. L., Abatzoglou, J. T., Sarhadi, A., Kolden, C. A., Williams, A. P., & Diffenbaugh, N. S. (2020). Climate change is increasing the likelihood of extreme autumn wildfire conditions across California. *Environmental Research Letters*, 15.
- Goverde, M., Schweizer, K., Baur, B., & Erhardt, A. (2002). Small-scale habitat fragmentation effects on pollinator behaviour: Experimental evidence from the bumblebee Bombus veteranus on calcareous grasslands. *Biological Conservation*, *104*, 293–299.
- Gunson, K., Seburn, D., Kintsch, J., & Crowley, J. (2016). Best Management Practices for Mitigating the Effects of Roads on Amphibian and Reptile Species at Risk in Ontario.
- Gustafson, K. D., Gagne, R. B., Vickers, T. W., Riley, S. P. D., Wilmers, C. C., Bleich, V. C., ... Ernest, H. B. (2018). Genetic source–sink dynamics among naturally structured and anthropogenically fragmented puma populations. *Conservation Genetics*, 20(2), 215–227.
- Haddad, N. M., Brudvig, L. A., Clobert, J., Davies, K. F., Gonzalez, A., Holt, R. D., ... Townshend, J. R. (2015). Habitat fragmentation and its lasting impact on Earth's ecosystems. *Science Advances*, 1(e1500052), 1–9.
- Hanson, C. (2020, September 29). Op-Ed: Don't believe self-serving messengers. Logging will not prevent destructive wildfires. *LA Times*.
- Heller, N. E., & Zavaleta, E. S. (2009). Biodiversity management in the face of climate change: A review of 22 years of recommendations. *Biological Conservation*, *142*, 14–32.
- Hernández, D. L., Vallano, D. M., Zavaleta, E. S., Tzankova, Z., Pasari, J. R., Weiss, S., ... Morozumi, C. (2016). Nitrogen Pollution Is Linked to US Listed Species Declines. *BioScience*, 66(3), 213–222.
- Hilty, J. A., & Merenlender, A. M. (2004). Use of Riparian Corridors and Vineyards by Mammalian Predators in Northern California. *Conservation Biology*, *18*(1), 126–135.
- Hilty, J., Worboys, G., Keeley, A., Woodley, S., Lausche, B., Locke, H., ... Tabor, G. (2020). Guidance for conserving connectivity through ecological networks and corridors. Best Practice Protected Area Guidelines Series No. 30. Gland, Switzerland.
- Jennings, M., & Lewison, R. (2013). Planning for Connectivity Under Climate Change: Using Bobcat Movement To Assess Landscape Connectivity Across San Diego County's Open Space.
- Jennings, M., & Zeller, K. (2017). Comprehensive Mmulti-species Connectivity Assessment and Planning for the Highway 67 Region of San Diego County, California.
- Kantola, T., Tracy, J. L., Baum, K. A., Quinn, M. A., & Coulson, R. N. (2019). Spatial risk assessment of eastern monarch butterfly road mortality during autumn migration within the southern corridor. *Biological Conservation*, 231, 150–160.
- Keeley, J. E. (2005). Fire as a threat to biodiversity in fire-type shrublands. Planning for biodiversity: bringing research and management together. USDA Forest Service General Technical Report PSW-GTR-195.
- Keeley, J. E. (2006). Fire management impacts on invasive plants in the western United States. *Conservation Biology*, 20(2), 375–384. https://doi.org/10.1111/j.1523-1739.2006.00339.x
- Keeley, J. E., Franklin, J., & D'Antonio, C. (2011). Fire and Invasive Plants on California Landscapes. In D. McKenzie, C. Miller, & D. A. Falk (Eds.), *The Landscape Ecology of Fire*. Dordrecht: Springer.
- Keeley, J. E., & Syphard, A. D. (2018). Historical patterns of wildfire ignition sources in California ecosystems. *International Journal of Wildland Fire*, 27(12), 781.
- Keeley, J. E., & Syphard, A. D. (2019). Twenty-first century California, USA, wildfires: fueldominated vs. wind-dominated fires. *Fire Ecology*, 15(24).

- Keeley, J. E., & Syphard, A. D. (2020). Nexus between wildfire, climate change and population growth in California. *Fremontia*, 47(2), 18–27.
- Kertson, B. N., Spencer, R. D., Marzluff, J. M., Hepinstall-Cymerman, J., & Grue, C. E. (2011). Cougar space use and movements in the wildland — urban landscape of western Washington. *Ecological Applications*, 21(8), 2866–2881.
- Kilgo, J. C., Sargent, R. A., Chapman, B. R., & Miller, K. V. (1998). Effect of stand width and adjacent habitat on breeding bird communities in bottomland hardwoods. *The Journal of Wildlife Management*, 62(1), 72–83.
- Kociolek, A. V., Clevenger, A. P., St. Clair, C. C., & Proppe, D. S. (2011). Effects of Road Networks on Bird Populations. *Conservation Biology*, 25(2), 241–249.
- Koteen, L. E., Baldocchi, D. D., & Harte, J. (2011). Invasion of non-native grasses causes a drop in soil carbon storage in California grasslands. *Environmental Research Letters*, 6.
- Kravchenko, A. N., Guber, A. K., Razavi, B. S., Koestel, J., Quigley, M. Y., Robertson, G. P., & Kuzyakov, Y. (2019). Microbial spatial footprint as a driver of soil carbon stabilization. *Nature Communications*, 10.
- Krosby, M., Theobald, D. M., Norheim, R., & Mcrae, B. H. (2018). Identifying riparian climate corridors to inform climate adaptation planning. *PLoS ONE*, *13*(11).
- Lee, J. S., Ruell, E. W., Boydston, E. E., Lyren, L. M., Alonso, R. S., Troyer, J. L., ... Vandewoude, S. (2012). Gene flow and pathogen transmission among bobcats (Lynx rufus) in a fragmented urban landscape. *Molecular Ecology*, 21(7), 1617–1631.
- Lohse, K. A., Newburn, D. A., Opperman, J. J., & Merenlender, A. M. (2008). Forecasting relative impacts of land use on anadromous fish habitat to guide conservation planning. *Ecological Applications*, 18(2), 467–482.
- Loss, S. R., Will, T., & Marra, P. P. (2014). Estimation of bird-vehicle collision mortality on U.S. roads. *Journal of Wildlife Management*, 78, 763–771.
- Luo, H., Oechel, W. C., Hastings, S. J., Zulueta, R., Qian, Y., & Kwon, H. (2007). Mature semiarid chaparral ecosystems can be a significant sink for atmospheric carbon dioxide. *Global Change Biology*, 13, 386–396.
- Maclean, I. M. D., & Wilson, R. J. (2011). Recent ecological responses to climate change support predictions of high extinction risk. *Proceedings of the National Academy of Sciences*, 108(30), 12337–12342.
- Mann, M. L., Berck, P., Moritz, M. A., Batllori, E., Baldwin, J. G., Gately, C. K., & Cameron, D. R. (2014). Modeling residential development in California from 2000 to 2050: Integrating wildfire risk, wildland and agricultural encroachment. *Land Use Policy*, *41*, 438–452.
- Marsh, D. M., & Jaeger, J. A. G. (2015). Direct effects of roads on small animal populations. In *Roads and ecological infrastructure: Concepts and applications for small animals* (pp. 42–56).
- Mcrae, B. H., Dickson, B. G., Keitt, T. H., & Shah, V. B. (2008). Using circuit theory to model connectivity in ecology, evolution, and conservation. *Ecology*, *89*(10), 2712–2724.
- Mcrae, B. H., Hall, S. A., Beier, P., & Theobald, D. M. (2012). Where to restore ecological connectivity? Detecting barriers and quantifying restoration benefits. *PLoS ONE*, *7*(12), e52604.
- Mitsch, W. J., & Wilson, R. F. (1996). Improving the success of wetland creation and restoration with know-how, time, and self-design. *Ecological Applications*, 6(1), 16–17.
- Morrison, K. (2019). The next (and oldest) frontier for carbon sequestration. Flora, 3(1), 17–35.
- Moyle, P. B., Katz, J. V. E., & Quiñones, R. M. (2011). Rapid decline of California's native

inland fishes: A status assessment. Biological Conservation, 144, 2414-2423.

- Nguyen, T., Saleh, M., Kyaw, M.-K., Trujillo, G., Bejarano, M., Tapia, K., ... Shilling, F. (2020). Special Report 4: Impact of COVID-19 Mitigation on Wildlife-Vehicle Conflict.
- Olson, D. H., & Burnett, K. M. (2013). Geometry of forest landscape connectivity: pathways for persistence. In *Density Management in the 21st Century: West Side Story: Proceedings of the Density Management Workshop, 4-6 October 2011, Corvalllis, Oregon.*
- Pacifici, M., Visconti, P., Butchart, S. H. M., Watson, J. E. M., Cassola, F. M., & Rondinini, C. (2017). Species' traits influenced their response to recent climate change. *Nature Climate Change*, 7(3), 205–208.
- Parmesan, C. (2006). Ecological and Evolutionary Responses to Recent Climate Change. *Annual Review of Ecology, Evolution, and Systematics*, *37*, 637–669.
- Parmesan, C., & Yohe, G. (2003). A globally coherent fingerprint of climate change ipacts across natural systems. *Nature*, 421(2), 37–42.
- Pinto, N., & Keitt, T. H. (2008). Beyond the least-cost path: Evaluating corridor redundancy using a graph- theoretic approach. *Landscape Ecology*, 24(2), 253–266.
- Price, A. (2020, May 29). How the West is Learning to Live with Mountain Lions. *Bitterroot Magazine*.
- Radeloff, V. C., Helmers, D. P., Kramer, H. A., Mockrin, M. H., Alexandre, P. M., Bar-Massada, A., ... Stewart, S. I. (2018). Rapid growth of the US wildland-urban interface raises wildfire risk. *Proceedings of the National Academy of Sciences*, 115(13), 3314–3319.
- Riley, S. P. D., Pollinger, J. P., Sauvajot, R. M., York, E. C., Bromley, C., Fuller, T. K., & Wayne, R. K. (2006). A southern California freeway is a physical and social barrier to gene flow in carnivores. *Molecular Ecology*, 15, 1733–1741.
- Riley, S. P. D., Serieys, L. E. K., Pollinger, J. P., Sikich, J. A., Dalbeck, L., Wayne, R. K., & Ernest, H. B. (2014). Individual behaviors dominate the dynamics of an urban mountain lion population isolated by roads. *Current Biology*, 24(17), 1989–1994.
- Riparian Habitat Joint Venture. (2004). *The Riparian Bird Conservation Plan: A strategy for reversing the decline of riparian associated birds in California.*
- Riparian Habitat Joint Venture. (2009). California Riparian Habitat Restoration Handbook.
- Ripple, W. J., & Beschta, R. L. (2006). Linking a cougar decline, trophic cascade, and catastrophic regime shift in Zion National Park. *Biological Conservation*, *133*, 397–408.
- Ripple, W. J., & Beschta, R. L. (2008). Trophic cascades involving cougar, mule deer, and black oaks in Yosemite National Park. *Biological Conservation*, *141*, 1249–1256.
- Ripple, W. J., Estes, J. A., Beschta, R. L., Wilmers, C. C., Ritchie, E. G., Hebblewhite, M., ... Wirsing, A. J. (2014). Status and ecological effects of the world 's largest carnivores. *Science*, 343(6167), 1241484.
- Robins, J. D. (2002). Stream Setback Technical Memo.
- Root, T. L., Price, J. T., Hall, K. R., Schneider, S. H., Resenzweig, C., & Pounds, J. A. (2003). Fingerprints of global warming on wild animals and plants. *Nature*, 421, 57–60.
- Ruth, T. K., & Elbroch, L. M. (2014). The carcass chronicles : carnivory, nutrient flow, and biodiversity. *Wild Felid Monitor*, 14–19.
- Safford, H. D., & Van de Water, K. M. (2014). Using Fire Return Interval Departure (FRID) analysis to map spatial and temporal changes in fire frequency on National Forest lands in California. *Pacific Southwest Research Station - Research Paper PSW-RP-266*, (January), 1–59. https://doi.org/Res. Pap. PSW-RP-266
- Scheffers, B. R., De Meester, L., Bridge, T. C. L., Hoffmann, A. A., Pandolfi, J. M., Corlett, R.

T., ... Watson, J. E. M. (2016). The broad footprint of climate change from genes to biomes to people. *Science*, *354*(6313).

- Semlitsch, R. D., & Bodie, J. R. (2003). Biological criteria for buffer zones around wetlands and riparian habitats for amphibians and reptiles. *Conservation Biology*, *17*(5), 1219–1228.
- Shilling, F. (2020). Wildlife Behavior in Response to Traffic Disturbance Wildlife Behavior in Response to Traffic Disturbance.
- Shilling, F., Waetjen, D., Harrold, K., & Farman, P. (2019). 2019 Impact of Wildlife-Vehicle Conflict on California Drivers and Animals.
- Slabbekoorn, H., & Ripmeester, E. A. P. (2008). Birdsong and anthropogenic noise: implications and applications for conservation. *Molecular Ecology*, *17*, 72–83.
- Smith, J. A., Suraci, J. P., Clinchy, M., Crawford, A., Roberts, D., Zanette, L. Y., & Wilmers, C. C. (2017). Fear of the human 'super predator' reduces feeding time in large carnivores. *Proceedings of the Royal Society B: Biological Sciences*, 284(1857), 20170433.
- Smith, J. A., Wang, Y., & Wilmers, C. C. (2015). Top carnivores increase their kill rates on prey as a response to human-induced fear. *Proceedings of the Royal Society B: Biological Sciences*, 282(1802).
- Soudzilovskaia, N. A., van Bodegom, P. M., Terrer, C., Zelfde, M. van't, McCallum, I., Luke McCormack, M., ... Tedersoo, L. (2019). Global mycorrhizal plant distribution linked to terrestrial carbon stocks. *Nature Communications*, *10*, 1–10.
- Stillwater Sciences. (2002). Napa River Basin Limiting Factors Analysis.
- Suraci, J. P., Clinchy, M., Zanette, L. Y., & Wilmers, C. C. (2019). Fear of humans as apex predators has landscape-scale impacts from mountain lions to mice. *Ecology Letters*, 22(10), 1578–1586.
- Syphard, A. D., Brennan, T. J., & Keeley, J. E. (2018). Chaparral Landscape Conversion in Southern California. In *Valuing Chaparral* (pp. 323–346).
- Syphard, A. D., Brennan, T. J., & Keeley, J. E. (2019). Drivers of chaparral type conversion to herbaceous vegetation in coastal Southern California. *Diversity and Distributions*, 25, 90– 101.
- Syphard, A. D., & Keeley, J. E. (2019). Factors associated with structure loss in the 2013–2018 California wildfires. *Fire*, 2(3), 49.
- Syphard, A. D., & Keeley, J. E. (2020). Why are so many structures burning in California. *Fremontia*, 47(2), 28–35.
- Syphard, A. D., Radeloff, V. C., Hawbaker, T. J., & Stewart, S. I. (2009). Conservation threats due to human-caused increases in fire frequency in mediterranean-climate ecosystems. *Conservation Biology*, 23(3), 758–769.
- Syphard, A. D., Radeloff, V. C., Keeley, J. E., Hawbaker, T. J., Clayton, M. K., Stewart, S. I., ... Hammer, R. B. (2007). Human influence on California fire regimes. *Ecological Society of America*, 17(5), 1388–1402.
- Traill, L. W., Brook, B. W., Frankham, R. R., & Bradshaw, C. J. A. (2010). Pragmatic population viability targets in a rapidly changing world. *Biological Conservation*, 143, 28– 34.
- Trenham, P. C., & Shaffer, H. B. (2005). Amphibian upland habitat use and its consequences for population viability. *Ecological Applications*, *15*(4), 1158–1168.
- Trombulak, S. C., & Frissell, C. A. (2000). Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology*, 14(1), 18–30.
- van der Ree, R., Jaeger, J. A. G., van der Grift, E. A., & Clevenger, A. P. (2011). Effects of roads

and traffic on wildlife populations and landscape function: Road ecology is moving toward larger scales. *Ecology and Society*, *16*(1), 48.

- Vicente-Serrano, S. M., Gouveia, C., Camarero, J. J., Beguería, S., Trigo, R., López-Moreno, J. I., ... Sanchez-Lorenzo, A. (2013). Response of vegetation to drought time-scales across global land biomes. *Proceedings of the National Academy of Sciences of the United States of America*, 110(1), 52–57.
- Vickers, T. W. (2020). Project Title: Santa Ana Mountains to eastern Peninsular Range Conservation Connectivity Infrastructure Planning Project for Interstate 15 and Closely Associated Roadways.
- Vickers, T. W., Sanchez, J. N., Johnson, C. K., Morrison, S. A., Botta, R., Smith, T., ... Boyce, W. M. (2015). Survival and mortality of pumas (Puma concolor) in a fragmented, urbanizing landscape. *PLoS ONE*, 10(7), 1–18.
- Wang, Y., Smith, J. A., & Wilmers, C. C. (2017). Residential development alters behavior, movement, and energetics in a top carnivore. *PlosOne*, 1–17.
- Warren, R., Price, J., Fischlin, A., de la Nava Santos, S., & Midgley, G. (2011). Increasing impacts of climate change upon ecosystems with increasing global mean temperature rise. *Climatic Change*, *106*(2), 141–177.
- Wiens, J. J. (2016). Climate-related local extinctions are already widespread among plant and animal species. *PLoS Biology*, *14*(12), 1–18. https://doi.org/10.1371/journal.pbio.2001104
- Wilmers, C. C., Wang, Y., Nickel, B., Houghtaling, P., Shakeri, Y., Allen, M. L., ... Williams, T. (2013). Scale dependent behavioral responses to human development by a large predator, the puma. *PLoS ONE*, 8(4).
- Yap, T. A., Rose, J. P., & Cummings, B. (2019). A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA).
- Yovovich, V., Allen, M. L., Macaulay, L. T., & Wilmers, C. C. (2020). Using spatial characteristics of apex carnivore communication and reproductive behaviors to predict responses to future human development. *Biodiversity and Conservation*, 29(8), 2589–2603.
- Zeller, K. A., Vickers, T. W., Ernest, H. B., & Boyce, W. M. (2017). Multi-level, multi-scale resource selection functions and resistance surfaces for conservation planning: Pumas as a case study. *PLoS ONE*, *12*(6), 1–20.



SMMC Agenda Item 9(c) 12/21/20

PO Box 50003 Studio City, CA 91614 805-225-4766 info@clawonline.org www.clawonline.org

December 9, 2020

Jason McCrea, City Planner Los Angeles City Planning Department 221 North Figueroa St, Room 1350 Los Angeles, CA 90012 Via Email

Notice of Preparation Comments - ENV-2018-1509-EIR, The Retreat in Benedict Canyon ("Project")

Dear Mr. McCrea:

Citizens for Los Angeles Wildlife (CLAW) is a non-profit environmental organization concerned with the wellbeing of wildlife and wildlife habitat for the City of Los Angeles and beyond. A citizenry of more than 5,000 individuals support our organization's multiple calls for biodiverse practices and policy to benefit LA City, County, California and the globe. Our wildlife is negatively affected by any project that would brazenly upzone and deviate from established planning policies in one of the most biodiverse regions of our city, which is exactly what The Retreat in Benedict Canyon is attempting to do. Please accept the following comments to be considered within the environmental analysis for this Project.

The Project exacerbates tenuous routes for medium or large sized mammals (mule deer, bobcat, mountain lion, and others) to travel eastward in Benedict Canyon. Essentially, the Project property is the only habitat hub that currently allows east-west habitat connectivity between Benedict and Peavine Canyons in the Santa Monica Mountains. We believe this Project will sever connectivity and be a significant biological impact without mitigation, and studies are needed to properly evaluate its impact.

CLAW requests that the DEIR analyze these tenuous habitat linkages and also analyze how much of the habitat linkages are in permanent fuel modification zones.

CLAW also requests that the DEIR must include at least one fully studied Project Alternative that provides for a minimum 250-foot-wide east-west habitat linkage from Benedict Canyon Drive along the southern property boundary to the southeastern property corner.

Sincerely,

Tony Tucci, Chair

CLAW is a public benefit non-profit 501(c)(3) environmental organization that works to protect and restore the environments of wildlife of Los Angeles and California from dwindling open spaces. Our mission is to promote, educate and protect the fundamental importance of wildlife, wildlife habitats and wildlife corridors everywhere.

Agenda Item 9(c) SMMC 12/21/2020



INITIAL STUDY

The Retreat at Benedict Canyon Project

Case Number: ENV-2018-1509-EIR

Project Location: 9704-9712 W. Oak Pass Road, 9800, 9801-9815 W. Wanda Park Drive2534 N. Hutton Drive, APNs 4382-014-0124383-002-005 4383-002-009, 4383-004-017, and 4384-010-012, Los Angeles, California, 90210

Community Plan Area: Bel Air-Beverly Crest Community Plan

Council District: 5 – Koretz

Project Description: The Retreat at Benedict Canyon Project (Project) proposes the demolition of two existing single-family residences and the construction of a 59-guest room hotel and eight single-family residences on an approximately 33-acre property in Benedict Canyon. The Project consists of hotel uses within 19 buildings on the northern 16acre portion of the site, and eight single-family residences on the southern 17-acre portion of the site. The main five-story hotel building includes up to 18 guest rooms, 7,960 square feet of bar/restaurant uses, 10,900 square feet of spa/fitness uses, outdoor pool and spa amenities, and an additional two floors of subterranean parking, for a total of 60,860 square feet of building floor area. An additional 14 bungalow-style hotel buildings, each up to twostories in height, would be dispersed throughout the hotel portion of the site, and would contain the remaining 41 hotel guest rooms with a total of 54,500 square feet of floor area. Three ancillary hotel buildings containing the main valet and hotel reception area, a rooftop restaurant, screening room, administrative uses, other hotel support services, and parking, would total 28,840 square feet of building floor area. Overall, the total floor area for the hotel portion of the site would be 146,610 square feet. Access between the main hotel building and main parking structure could include a funicular railway. The eight single-family residences on the eastern portion of the site would range in size between from approximately 12,000 to 48,000 square feet of residential floor area, and would have a combined residential floor area of 181,000 square feet. Development of the overall site would also include the removal of existing trees and vegetation and the installation of new landscaping, pathways, exterior decks, and other outdoor amenities. Preliminary site grading would require approximately 117,230 cubic yards of total grading and result in the off-site export of approximately 950 cubic yards of soil, while the remaining 116,280 cubic yards of cut would be balanced on-site. Maximum excavation depths would be approximately 62 feet below existing grade.

PREPARED FOR:	PREPARED BY:	APPLICANT:
City of Los Angeles	HELIX Environmental Planning, Inc.	9712 Oak Pass Road, LLC.
Department of City Planning	16485 Laguna Canyon Road, Suite 150 Irvine, CA 92618	9663 Santa Monica Boulevard #406, Beverly Hills, CA 90210

PREPARED FOR:

The City of Los Angeles Department of City Planning

PREPARED BY:

HELIX Environmental Planning, Inc. 16485 Laguna Canyon Road, Suite 150 Irvine, CA 92618

APPLICANT:

9712 Oak Pass Road, LLC 9663 Santa Monica Boulevard #406, Beverly Hills, CA 90210

TABLE OF CONTENTS

	Pa	ge
Introducti	on	5
Executive	Summary	8
Project D	escription	11
1.	Project Summary	11
2.	Environmental Setting	11
3.	Description of Project	17
4.	Requested Permits and Approvals	27
5.	Responsible Public Agencies	27
Evaluatio	n of Environmental Impacts	29
I.	Aesthetics	29
11.	Agriculture and Forestry Resources	33
III.	Air Quality	36
IV.	Biological Resources	38
V.	Cultural Resources	41
VI.	Energy	43
VII.	Geology and Soils	45
VIII.	Greenhouse Gas Emissions	49
IX.	Hazards and Hazardous Materials	50
X. VI	Hydrology and Water Quality	55
	Land Use and Planning	62
	Noise	62
XIII. XIV/	Population and Housing	6/
XIV. X\/	Public Services	66
XVI	Recreation	68
XVII	Transportation	70
XVII	I. Tribal Cultural Resources	71
XVIX	(Utilities and Service Systems	73
XX.	Wildfire	78
XXI.	Mandatory Findings of Significance	80

List of Figures

1	Regional Location	13
2	Aerial Photograph	14
3	General Plan Land Use	15
4	Zoning Map	16
5	Conceptual Site Plan	19

List of Tables

1	Project Development Summary	17
2	Hotel Use Summary	21
3	Hotel Structure Height Summary	22
4	Residential Use Summary	22
5	Protected and Significant Tree Summary	24

List of Appendices

Appendix A	Tree Survey Letter Report
Appendix B	Historic Resources Assessment
Appendix C	Geotechnical Engineering Investigation Report
Appendix D	Phase I Environmental Site Assessment
Appendix E	Preliminary Hydrology Study
Appendix F	Los Angeles Department of Water and Power Will-Serve Letter

1 INTRODUCTION

An application for the proposed Retreat at Benedict Canyon Project ("Project") has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study (and the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.¹

¹ State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (http://resources.ca.gov/ceqa).

Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the Lead Agency is starting the preparation of an EIR for the proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the Lead Agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the Lead Agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide

public agencies and the general public an opportunity to review the Draft EIR and comment on the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to comments on environmental issues received during the comment period are prepared.

Final EIR

The Lead Agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving a project for which an EIR has been prepared, the Lead Agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	The Retreat at Benedict Canyon Project
ENVIRONMENTAL CASE NO.	ENV-2018-1509-EIR
RELATED CASES	CPC-2018-1506-GPA-VZC-SP-SPP-SPR; CPC-2018- 1507-DA; VTT-74908

PROJECT LOCATION	Benedict Canyon, Los Angeles, CA 90210
COMMUNITY PLAN AREA	Bel Air-Beverly Crest Community Plan Area
GENERAL PLAN DESIGNATION	Minimum Residential, Very Low I Residential, Very Low II Residential
ZONING	RE15-1-H-HCR, RE20-1-H-HCR, RE40-1-H-HCR
COUNCIL DISTRICT	5 – Koretz

LEAD AGENCY	City of Los Angeles
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Jason McCrea
ADDRESS	221 N. Figueroa St., Suite 1350, Los Angeles, CA 90012
PHONE NUMBER	(213) 847-3672
EMAIL	jason.mccrea@lacity.org
APPLICANT	9712 Oak Pass Road, LLC
ADDRESS	9663 Santa Monica Boulevard #406, Beverly Hills, CA

90210

PHONE NUMBER (818) 591-9309

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

Aesthetics	Greenhouse Gas Emissions	\boxtimes	Public Services
Agriculture & Forestry Resources	Hazards & Hazardous Materials		Recreation
🛛 Air Quality	Hydrology / Water Quality	\boxtimes	Transportation
Biological Resources	🛛 Land Use / Planning	\boxtimes	Tribal Cultural Resources
Cultural Resources	Mineral Resources		Utilities / Service Systems
Energy	🛛 Noise	\boxtimes	Wildfire
Geology / Soils	Population / Housing	\boxtimes	Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- □ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Jason McCrea, Planning Assistant PRINTED NAME, TITLE November 10, 2020 DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Retreat at Benedict Canyon Project (the "Project") proposes a 59-room hotel and eight (8) single-family homes on an approximately 32.67-acre property in Benedict Canyon (the "Project Site"). The Project Site is separated into a residential and hotel component. The hotel portion of the site consists of a total of 18 hotel buildings, totaling 59 guest rooms, and a standalone parking structure, Building P. The main hotel building includes 54,260 square feet of hotel use, including outdoor amenities, 7,960 square feet of commercial space, and two levels of subterranean parking. The Hotel component would provide total of 260 vehicle spaces, 80 spaces in the main hotel building, and 180 spaces in Building P. Access between Building A and Building P would be served by a funicular railway. The residential portion of the site contains eight single-family homes comprised of a combined residential floor area of 181,000 square feet, ranging between approximately 12,000 and 48,000 square feet of residential floor area, or an average of approximately 22,625 square feet. Homes would include associated garage parking and open space; and be located on the southern portion of the project site. The hotel portion of the site includes 16.13 acres, of which a total of 51,956 square feet, or approximately 1.2 acres, would remain as undisturbed open space and 527,312 square feet, or approximately 12.1 acres, would consist of a combination of landscaping, walking paths, and disturbed open space areas. The residential component includes 16.54-acres of the Project Site. Approximately 542,435 square feet, or a total of 12.5 acres, of the residential component would be comprised of a combination of landscaping and open space. All open space areas within the residential portion of the Project Site would be private open space located within each residential lot and accessible only to each respective homeowner.

Two existing single-family residences and associated facilities currently located on-site would be demolished and removed from the Project Site. Preliminary site grading would require a total of approximately 117,230 cubic yards of total grading and result in the off-site export of approximately 950 cubic yards of soil, while the remaining 116,280 cubic yards of cut would be balanced on-site. Maximum excavation depths would be approximately 62 feet below existing grade.

3.2 ENVIRONMENTAL SETTING

Project Location

The Project Site includes fifteen individual parcels² and is located within Benedict Canyon in the City of Los Angeles. The Project Site is surrounded by existing single-family residential uses on all sides, but is roughly bounded by Benedict Canyon Drive to the west, Hutton Drive to the north,

² The following parcels comprise the Project Site: Assessor Parcel Number (APN) 4384-007-025 (9704 W. Oak Pass Road), APN 4384-007-012 (9710 W. Oak Pass Road), APN 4384-007-012 (9712 W. Oak Pass Road), APN 4383-002-008 (9800 W. Wanda Park Drive), APN 4383-001-021 (9801 W. Wanda Park Drive), APN 4383-001-022 (9805 W. Wanda Park Drive), APN 4383-00 1-023 (9809 W. Wanda Park Drive), APN 4383-001-024 (9811 W. Wanda Park Drive), APN 4383-00 1-025 (9815 W. Wanda Park Drive), APN 4382-014-004 (2534 N. Hutton Drive), APN 4382-014-012 (No Street Address), APN 4383-002-005 (No Street Address), APN 4383-002-009 (No Street Address), APN 4383-004-017 (No Street Address), and APN 4384-010-012 (No Street Address).

Oak Pass Road to the east, and Yoakum Drive to the south. The proposed Specific Plan area would be contiguous with the Project Site boundaries.

The Project Site is located within the western portion of the City of Los Angeles, approximately 1.3 miles north of the City of Beverly Hills, approximately 2.6 miles northwest of the City of West Hollywood, and approximately 8 miles from the Pacific Ocean. The Project Site is located approximately one mile south of Mulholland Drive, which is designated as a scenic parkway. Primary regional access to the Project Site is provided via the San Diego Freeway (Interstate 405; I-405), which runs north-south approximately 3 miles west of the Project Site; the Hollywood Freeway (U.S. 101), which runs north-south approximately 2.5 miles north of the Project Site; and Santa Monica Boulevard/California State Route 2 (SR-2), which runs east-west approximately 3.5 miles south of the Project Site. Major arterials providing regional and sub-regional access to the Project Site and Sunset Boulevard located approximately 2.5 miles south of the Project Site is currently directly accessible from Wanda Park Drive and Oak Pass Road via private driveways.

See **Figure 1**, *Regional Location*, for the location within the context of the City. See **Figure 2**, *Aerial Photograph*, for the Project Site and immediate surrounding areas.

Existing Conditions

The Project Site is currently improved with two existing residential structures, including one located at 9800 W. Wanda Park Drive and one located at 2534 N. Hutton Drive and associated landscaping and improvements, as well as seven graded unpaved terraces remaining from previous structures, and infrastructure and utility improvements, including roadways that traverse the Project Site and a concrete bridge. Overall, the Project Site currently contains a total of approximately 263,737 square feet (6.1 acres) of disturbed (i.e., previously graded, cleared, or developed) area, or 19.1% of the total site area, and approximately 1,115,808 square feet (25.6 acres) of undisturbed area, or 80.9% of the total site area. The Project Site contains native and non-native vegetation including oak trees and other native trees located throughout the entire Project Site, with higher densities of trees generally located within canyon areas and steep hillsides, generally towards the center of the site. The Project Site contains a total of 1,096 protected and significant trees, including 752 native species trees considered protected by the City's tree ordinance, and another 344 trees that meet the City's criteria for "significant trees".³

The Project Site is located within the Bel Air-Beverly Crest Community Planning Area (CPA). The Bel Air-Beverly Crest CPA boundary includes areas south of Mulholland Drive, west of Laurel Canyon Boulevard, Wonderland Drive and the City of Beverly Hills, north of Sunset Boulevard and the City of Beverly Hills, and east of the I-405. The Bel Air-Beverly Crest CPA is generally characterized by residential neighborhoods associated with canyon and hillside areas and includes single-family, residential estates, multi-family, and commercial uses. The Project Site has multiple General Plan land use and zoning designations as shown below in **Figure 3**, *General Plan Land Use*, and **Figure 4**, *Zoning Map*, respectively.

³ Carlberg Associates Horticulturalists and Registered Consulting Arborists. The Preserve' – 9712 Oak Pass Road, Los Angeles, California 90210 (APNs 4382014012, 4383001025, 4383001024, 4383001023, 4383001022, 1383001021, 4383002008, 4383002009, 4383002005, and 4383004017, an additional approximate 12 acres, and 2534 Hutton Drive). February 2017. Included in Appendix A of this Initial Study.

The Retreat at Benedict Canyon



Regional Location

Figure 1

The Retreat at Benedict Canyon



Aerial Map

Figure 2



General Plan Land Use

Figure 3



Zoning Map Figure 4

As shown in Figure 3, Project Site's current General Plan land use designations are Minimum Residential, Very Low I Residential, and Very Low II Residential. As illustrated in Figure 4, the Project Site's current zoning designations are Residential Estate with minimum 15,000 square-foot lot area in Height District 1 Hillside area and a Hillside Construction Regulation (HCR) Supplemental Use District (RE15-1-H-HCR), Residential Estate with minimum 20,000 square-foot lot area in Height District 1 Hillside area and HCR Supplemental Use District (RE20-1-H), and Residential Estate with minimum 40,000 square-foot lot area with Height District 1 and Hillside area, as well as a HCR Supplemental Use District (RE40-1-H-HCR). Height calculations in the Hillside Area is calculated pursuant to LAMC Section 12.21 C.10(d) which allows for a maximum height of 36' or 30', depending on the slope of the roof, for structures in the RE15, RE20, and RE40 zones in Height District 1, as measured from Hillside Area Grade, as defined in LAMC Section 12.03. The Project proposes a Specific Plan which would establish height regulations for the site.

Surrounding Land Uses

The Project Site is located in a primarily residential area that includes single-family residences, large residential estates, undeveloped parcels, and open space areas with sloping hillside topography. Single-family residential uses are located adjacent or in close proximity to the Project Site, particularly along the western and northern boundaries of the Project Site (see Figure 2). Single-family residential uses to the east and south are generally located farther away from the Project Site boundary, with those to the south located a minimum of approximately 100 feet away from the site at the base of a steep canyon.

3.3 DESCRIPTION OF PROJECT

Project Overview

The Project would include the demolition of the two existing single-family residences, site clearing and grading (including tree and vegetation removal where necessary), redevelopment of the existing infrastructure, including roadways that traverse the Project Site and a concrete bridge, and the construction of a 59-guest room hotel, consisting of 19 buildings, eight single-family homes, associated parking, infrastructure, landscaping, and open space areas on a 32.67-acre site. The proposed Specific Plan proposed for the Project sets forth development regulations for the Project's hotel and residential components, including maximum density, building heights, setbacks, and other requirements. The Project Site would be merged and re-subdivided into nine lots through a Vesting Tentative Tract Map request. A summary of the proposed improvements is provided below in **Table 1**, *Project Development Summary*, while a conceptual site plan is presented below in **Figure 5**, *Conceptual Site Plan*.

-	-	•
Land Use	No. of Structures	Floor Area
Hotel	19	146,610 square feet
Single-Family Residential	8	181,000 square feet
Source: 9712 Oak Pass Road, LLC, 2019		

Table 1
Project Development Summary
Hotel Component

The hotel component would be developed on Lot 9, a 16.13-acre lot on the northern portion of the Project Site. The hotel would consist of a 59-guest room hotel housed within a total of 19 buildings. The main hotel building, located in the northeastern portion of the Project Site, includes five floors of hotel uses, two floors of subterranean parking, and a total of 146,610 square feet of floor area, which would include 18 hotel guest rooms, a 2,000-square-foot lobby/reception area, 7,960 square feet of restaurant and bar floor area (including indoor and outdoor seating, bar, and kitchen areas), 10,900 square feet of spa/fitness facility floor area, as well 11,760 square feet of pool and pool deck area (including main pool and spa pool areas), 260 parking spaces, and other ancillary guest services. The majority of the guest rooms would be contained in 14 separate bungalow-style buildings (i.e., Buildings B, C, D, F, and G) dispersed throughout the central portion of the hotel component of the Project Site. Building P, located in the northern portion of the hotel area, serves as the Project's main parking structure and also contains the proposed private screening room. Building H, located immediately south of and adjacent to Building P, contains the main valet and hotel reception area. Building S, located just south and west of Building H, includes administrative and staff support services, a security office, and a rooftop restaurant, while Building T contains staff parking, laundry and housekeeping facilities, shipping and receiving, and storage. Building T is located in the western portion of the hotel component near the main entrance off of Hutton Drive.

A summary of the proposed hotel and related ancillary uses is provided below in **Table 2**, *Hotel Use Summary*. It is estimated that the hotel component would accommodate a maximum of approximately 115 hotel guests. Additionally, hotel amenity uses would typically accommodate approximately 45 guests or visitors in the main hotel restaurant, approximately 18 guests or visitors in the Building S restaurant, approximately 45 guests or visitors in the private screening room, and approximately 20 guests or visitors in the hotel spa. Maximum occupancies for each of these uses would be dictated by LAMC requirements prior to occupancy of proposed hotel structures. Any proposed special events would be in conformity with all hotel occupancy requirements. In addition, the Project would provide up to approximately 90 full time equivalent employment positions.

The hotel uses would have a floor-area ratio (FAR) of 0.21:1. All hotel structures would be set back at least 15 feet from the property line and would maintain a minimum separation of 20 feet from one another. All hotel structures would be limited to a maximum building envelope height of 69 feet.⁴ The main hotel building (Building A) would consist of two fully subterranean levels and five above-ground parking levels terraced into the hillside and following the contours of the existing topography, and would be limited to a maximum building envelope height of 69 feet. The Parking building (Building P) would be limited to a building envelope height of 31 feet from finished grade for the majority of the building, with a maximum building envelope height of 54 feet at the building entrance. All other hotel associated buildings would be limited to a maximum height of 33 feet from each building's finished ground-floor level grade.

⁴ Per the City's Baseline Hillside Ordinance (Ordinance No. 181624), envelope height (otherwise known as vertical height or "plumb line" height) shall be the vertical distance from the grade of the site to a projected plane at the roof structure or parapet wall located directly above and parallel to the grade. Measurement of the envelope height shall originate at the lowest grade within 5 horizontal feet of the exterior walls of a Building or Structure. At no point shall any given section of any part of the proposed building or structure exceed the maximum envelope height.



Project Site Plan

A summary of the proposed buildings and associated building envelope heights is provided below in **Table 3**, *Hotel Structure Height Summary*.

On-site alcohol sales and consumption are proposed throughout the hotel, including as part of its restaurant uses, bar, pool areas, lounge areas, room services, and mini-bars located in each guest room. All sales of on-site alcohol shall comply with specified conditions approved as part of the Specific Plan.

In addition, while the hotel facilities would not include any dedicated ballroom event space, some limited special events associated with small gatherings are contemplated by the Project. Such events would be restricted to hotel guests or private invite-only guests. Examples of such events could include, but are not limited to, small-scale weddings, corporate events, dinners, film screenings (within the proposed screening room located inside Building P), and other such similar activities. These limited events would be hosted on-site as part of regular hotel operations. The scale of such events would be consistent with the typical overall intensity of normal hotel operations. Such operations include the restaurants/bars, spa, and hotel room facilities. Events would not exceed the maximum operating capacity of each use pursuant to LAMC requirements. Private events could also occur at the single-family residential homes.

Residential Component

The residential component would consist of eight single-family homes for a total of 181,000 square feet of floor area on Lots 1-8, which collectively comprise 16.54 acres, as summarized below in **Table 4**, *Residential Use Summary*. As shown in Table 4, each residential lot would have a minimum size of approximately 65,000 square feet (or approximately 1.5 acres). As shown in Table 4, residential buildings would range between approximately 12,000 and 48,000 square feet of residential floor area, or an average of approximately 22,625 square feet, and would be up to two stories (above-grade) with a maximum building envelope height limit of 45 feet. In addition to establishing maximum building heights for the proposed residences, the Specific Plan's residential lot. The proposed structures would be designed in a contemporary architectural style that incorporates building materials such as wood, metal, concrete, glass, and stone.

Conceptual Site Plan

The hotel component consists of 19 buildings dispersed throughout the 16.13-acres on Lot 9. The hotel buildings would consist of a main hotel building (Building A), a primary parking structure and a reception building (Buildings P & H), staff and support buildings (Buildings S & T), and 14 smaller detached hotel room bungalow-styled structures. Hotel uses would comprise a total of 146,610 square feet. The 19 hotel buildings would house a total of 59 guestrooms; guest reception/check-in areas; restaurant and bar uses; a lobby/reception area in Building H; other ancillary administrative and staff services in Building S; and parking, laundry, housekeeping, security, and receiving facilities in Building T. The hotel would include a reception area/check-in facility with a valet court (Building H, attached to Building P), which would be directly accessible from N. Hutton Drive via a new private entry driveway. From the reception area, hotel guests would access Building A and other proposed hotel structures via golf carts, a proposed funicular, or walking paths. A secondary valet area for VIP guests is located adjacent to Building A. Footpaths would be provided throughout the Project Site for pedestrian access and connectivity between the various structures and amenities.

Building A – Main Hotel ¹	# of Units	Floor Area
Main Hotel Guest Rooms		
1-Bedroom Units	3	3.250
Loft Suites	10	7,150
2-Bedroom Units	2	3,000
2-Bedroom Pool Penthouse Units	3	11.440
Amenities/Ancillary Uses		, -
Restaurant/Bar	-	6.000
Main Hotel Pool/Pool Deck	-	_
Retail	-	600
Spa/Fitness	-	10.900
Reception/Concierge/Lobby	-	2,000
Lobby Restrooms	-	1.320
Administration/Offices	-	890
Valet/Entry Area	-	1.100
Equipment/Storage/Utilities	-	3.680
Interior Circulation	-	9.530
Total Building A	18	60.860
		,
Detached Hotel Structures		
Building B – 4-Bedroom VIP Villa	1	5,000
Building C – 1-Bedroom Bungalows	22	26 400
(8 buildings, 2 to 4 units per building)	22	20;400
Building D – 2-Bedroom Pool Villas	6	0.000
(3 buildings, 2 units per building)	0	9,900
Building F – 2-Bedroom Villa	1	7 600
(2 buildings, 2 units per building)		7,000
Building G – Suites	8	5 600
(4 buildings, 2 units per building) ²	0	3,000
Parking and Service Facilities		
Building H – Reception	-	1 800
(Reception, Security, Staff Area, Restrooms)		1,000
Building P – Parking Structure	-	7 800
(Parking, Screening Room/Kitchen, Storage) ³		1,000
Building S – Staff and Restaurant	-	8.550
(Admin, Staff Facilities, Restaurant, Garden)		5,500
Building T – Delivery and Support		
(Parking, Laundry, Housekeeping, Commissary,	-	11,140
Maintenance, Security, Receiving, Storage)*	50	
Hotel Totals [®]	59	146,610
Hotel Floor-Area Ratio		0.21

Table 2

Hotel Use Summary

Source: 9712 Oak Pass Road, LLC, 2019

Notes:

1. Building A also includes) 30 parking spaces in one basement parking level.

2. G buildings are attached to buildings D1, D2, C1, and C11, and therefore are not considered separate structures.

3. Building P includes 180 parking spaces in four above-grade levels.

4. Building T includes 50 parking spaces two subterranean levels.

Outdoor seating for restaurant/bar in Building A (1,960 SF) is included in Hotel Floor Area

Table 3

Hotel Structure	Height	Summary
-----------------	--------	---------

Building Name	No. of Buildings	Levels (Above Grade)	<u>Height</u>
Α	1	5	69 feet
В	1	2	33 feet
С	8	2	32 feet
D	3	2	32 feet
F	2	2	33 feet
P & H	2	5	54 feet
S	1	1	20 feet
Т	1	0	34 feet

Source: 9712 Oak Pass Road, LLC, 2019

Residential Ose Sullinal y					
Residential <u>Unit</u>	Residential SF	Lot Area SF	<u>Max. Height</u>		
Residence #1	22,000	65,344	45 feet		
Residence #2	25,000	65,338	45 feet		
Residence #3	30,000	65,262	45 feet		
Residence #4	12,000	68,793	45 feet		
Residence #5	12,000	68,327	45 feet		
Residence #6	12,000	70,671	45 feet		
Residence #7	20,000	71,734	45 feet		
Residence #8	48,000	244,962	45 feet		
Total	181,000	720,431	-		

Table 4 Residential Use Summary

Source: 9712 Oak Pass Road, LLC, 2019

Parking would be provided in three buildings, including Building A, Building P, and Building T. Parking in Building A would include self-parking for senior hotel staff and valet-only parking for hotel guests and visitors, while Building P would serve hotel guests and visitors and would be valet-only. Parking in Building T would be exclusively self-parking for hotel staff. Building A would be terraced into the hillside and both Buildings A and P would incorporate "green roofs" and other screening, such as wall façade treatments and landscaping. Building T would be entirely subterranean.

The residential component would consist of eight single-family homes on Lots 1-8, which range in size from approximately 1.5 to 5.62 acres. The proposed Specific Plan's residential development standards would regulate maximum residential floor area for each residential lot, with a total residential floor area for all eight lots combined of 181,000 square feet. The overall residential lot coverage of development proposed by the Conceptual Site Plan would be approximately 20-percent for structures, with the remaining approximately 80 percent (542,435 square feet or almost 12.5 acres) occupied by pathways, landscaped areas, and other green spaces.

Design and Architecture

The Project would be designed to conform to the existing topography of the Project Site and minimize the visual impact of the development while maximizing the views and outdoor spaces that are available on-site. Proposed hotel structures would be terraced on the hotel portion of the property utilizing existing graded areas, infrastructure, and roads to the extent feasible, and would be distributed throughout Lot 9 to maximize privacy for hotel guests and minimize the development footprint in this area. The residential uses would be single-family homes between two and three stories in height located on individual residential lots accessible via private driveways. Similar to the hotel structures, the single-family homes would be designed with a contemporary modern architectural style using building materials such as concrete, glass, wood, metal, stone veneers, and other natural materials.

Open Space and Landscaping

Currently, the site contains approximately 26.6 acres of undeveloped space, and 1,076 inventoried trees. As noted above, a total of approximately 472 protected trees on the Project Site would be preserved, with up to 260 protected trees being removed and replaced on-site at a 4:1 ratio per City requirements. Therefore, the Project would be required to provide 1,040 replacement protected trees, but would provide a total of 1,118 replacement protected trees on-site for a net addition of 858 protected trees.⁵ A total of 344 non-native significant trees, some of which are considered invasive or fire hazards by the Project arborist, are located on the Project Site. Of these, 57 significant trees would be preserved on-site while 287 significant trees would be removed and replaced at a 1:1 ratio with native trees. A summary of the existing trees on-site, trees to be removed, and trees provided is provided below in **Table 5**, *Protected and Significant Tree Summary*. It should be noted that native tree species below the four-inch trunk diameter threshold or non-native trees under 8-inch trunk diameter were not inventoried. All invasive plant material would be removed throughout the Project Site, restoring native vegetation on-site in these areas.

⁵ Carlberg Associates Horticulturalists and Registered Consulting Arborists. The Preserve' – 9712 Oak Pass Road, Los Angeles, California 90210 (APNs 4382014012, 4383001025, 4383001024, 4383001023, 4383001022, 1383001021, 4383002008, 4383002009, 4383002005, and 4383004017, an additional approximate 12 acres, and 2534 Hutton Drive). February 2017. Included in Appendix A of this Initial Study.

Protected and Significant Tree Summary							
Tree Existing Trees to Trees Replacement Ratio and Trees Total							
Status	s <u>Trees</u> <u>Remain</u> <u>Removed</u> <u>Required Number</u>				Provided	<u>Trees</u>	
Protected	732	472	260	4:1 (1,040 trees)	1,118	1,590	
Significant	344	57	287	1:1 (287 trees)	287	344	
Total	1,076	529	547	1,327	1,405	1,934	

Table 5 Protected and Significant Tree Summary

Source: 9712 Oak Pass Road, LLC, 2019

The Project would include a total of approximately 5.2 acres (227,820 square feet) of undisturbed natural open space, including approximately 4 acres (175,864 square feet) in the residential portion (Lots 1 through 8) and approximately 1.2 acres (51,956 square feet) in the hotel portion (Lot 9). The hotel portion of the Project Site would include 12.1 acres (527,312 square feet) of landscaped areas, including accessible walking paths, while the residential portion would include 12.5 acres (542,435 square feet) of landscaping. The hotel component would also include 43 exterior decks for use by hotel guests, including two large deck areas in Building A and smaller private decks for each of the 41 detached guest units, totaling approximately 32,334 square feet. All hotel room decks would generally be oriented to the west toward the interior of the Project Site and downslope.

Initial grading for the Project Site as a whole would be designed to minimize dirt export to approximately 950 cubic yards, balancing the remaining 116,280 cubic yards of cut on-site. More specifically, the hotel portion of the Project Site would require a total of 95,062 cubic yards of cut and 38,257 cubic yards of fill (net cut of 56,805 cubic yards), while the residential portion would require 22,168 cubic yards of cut and 78,023 cubic yards of fill (net fill of 55,855 cubic yards), a difference of 950 cubic yards. Development portions of the Project Site would incorporate existing trees and native plants and would include a dog park located on the roof of Building T, which itself is located right near the main Project entry from Hutton Drive. The dog park would be accessible to the general public.

The Project would incorporate new and enhanced infrastructure improvements including a water system and improved emergency vehicle accessibility (including access for fire trucks and equipment) and would manage brush areas to reduce fire hazards. Any significant trees deemed a fire hazard by the Project arborist would be removed and replaced with native species at a rate to be determined by the City's Urban Forestry Division.

Access, Circulation, and Parking

Primary vehicular access to the Hotel Component on the Project Site would be provided via Hutton Drive. Any access point from Wanda Park Drive would serve the proposed single-family homes only, while providing secondary emergency access for the Hotel Component. A third access point, also serving as emergency access only for the entire Project Site, would be provided from Oak Pass Road. Internal circulation within the Project Site would consist of private streets. Access to the residential component of the Project would be gated both from Wanda Park Drive and Oak Pass Road and from the hotel component. The existing roads that currently traverse the Project Site are considered substandard in terms of slope, width, and/or turning radii, and would therefore be improved and would be similarly aligned along the existing alignments, thereby providing improved fire access for both the Project Site and the adjacent areas.

According to LAMC Section 12.21, parking requirements, the hotel component of the Project would be required to provide a total of 187 parking spaces. Building P would be a stand-alone parking facility with 180 parking spaces, with an additional 80 spaces provided in other buildings, for a total of 260 spaces, which would exceed LAMC parking requirements for the proposed hotel uses by 73 spaces. In addition, the hotel facilities would be required to provide 24 bicycle parking spaces (12 short-term and 12 long-term), which would be provided within Building P (long-term) and outside of Building P (short-term). The LAMC also requires that each of the single-family homes provide at least two covered parking spaces in an attached garage on each lot. As such, each proposed single-family home would include a minimum two-car garage to provide the necessary off-street parking. Hotel Building A would include two fully subterranean levels of parking with approximately 30 parking spaces. Parking Structure P, located immediately north of the valet court and attached to the reception area/check-in facility (Building H), would include approximately 180 parking spaces within two subterranean levels and two above-grade levels. Building T, located south of Building S, would include approximately 50 parking spaces in two subterranean levels. Overall, a total of 260 parking spaces and 36 bicycle parking spaces (18 short-term spaces outside the Building P reception area and 18 long-term spaces within Building P) would be provided for the hotel uses, which meets the code-required parking for the hotel component.

Lighting and Signage

Project-related lighting would include streetlights, landscape lighting, architectural lighting, lighting from the hotel uses and rooftop terraces, and lighting associated with entry and wayfinding signage. All Project lighting would be shielded and/or focused onto the Project Site per LAMC lighting requirements and would be designed to provide only the necessary level of illumination for general nighttime visibility (such as outdoor dining) and safety. The Project's residential structures would also include lighting typical of single-family residential uses. Existing LAMC regulations prohibit any sign to be arranged or illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property (Chapter 1, Article 4.4, Section 14.4.4). Existing regulations also require that no exterior light may cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units (Chapter 9, Article 3, Sec. 93.0117(b)). The Project's hotel and residential components would comply with these LAMC lighting regulations.

Site Security

In addition to security lighting throughout the developed portions of the Project Site, other Project security features would include 24-hour on-site security service with one security office in Building T and another in Building H. In addition, the Project proposes to provide a new access point for emergency vehicles to the Project Site (i.e., the new main access road at Hutton Drive) in addition

to the existing vehicular access points off of Wanda Park Drive and Oak Pass Road. Lastly, the proposed residential uses would have restricted (gated) access from Wanda Park Drive and Oak Pass Road and the hotel portion of the Project Site in order to provide increased security for the residential uses.

Special Events

As noted previously, while the hotel facilities would not include any dedicated ballroom event space, some limited special events associated with small gatherings are contemplated by the Project. Such events would be restricted to hotel guests or private invite-only guests. Examples of such events could include, but are not limited to, small-scale weddings, corporate events, dinners, film screenings (within the proposed screening room located inside Building P), and other such similar activities. These limited events would be hosted on-site as part of regular hotel operations. The scale of such events would be consistent with the typical overall intensity of normal hotel operations. Such operations include the restaurants/bars, spa, and hotel room facilities. Events would not exceed the maximum operating capacity of each use pursuant to LAMC requirements. Private events could also occur at the single-family residential homes.

Sustainability Features

The single-family homes would be, at a minimum, Leadership in Energy and Environmental Design (LEED) Certified, while the hotel facilities would be a minimum of LEED Gold. In addition, the Project would comply with the mandatory requirements of the Los Angeles Green Building Code (LAGBC), which is updated every three years and is currently based on the 2019 California Green Building Standards Code (CalGreen).⁶

Anticipated Construction Schedule

Construction is expected to occur in phases. The first phase, which would likely include site grading, and construction of infrastructure, the hotel and two of the eight single-family homes, would begin in 2022 and would last approximately three years, with completion in approximately 2025. Construction activities would commence with demolition of the existing structures and road pavement, followed by site preparation, excavation and grading; installation of drainage and utilities, and building construction and application of architectural coatings. Demolition activities would result in the removal of approximately 1,500 cubic yards of building materials. It is anticipated that demolition and site preparation would occur over a six-month period. Approximately 950 cubic yards of soil would be removed from the Project Site as a whole during the preliminary excavation and grading phase. The preliminary excavation and grading/infrastructure phase would last approximately 20 months ending in mid- to late 2024. The remaining phases would be tied to the construction of each of the remaining six single-family homes, which would each occur over an approximately three-year period starting in approximately 2025; however, all site infrastructure will be completed in phase one of construction. Construction of the remaining 6 proposed single-family homes is anticipated to be completed in 18 to 22 months from commencement of construction of these structures, with completion as early as 2028.

In an effort to minimize the daily amount of construction emissions, earthwork and soil export will be minimized. Preliminary site grading would result in the export from the Project Site as a whole

⁶ Los Angeles Department of Building and Safety: http://ladbs.org/LADBSWeb/green-bldg.jsf

of approximately 950 cubic yards, while the remaining 116,280 cubic yards of cut would be balanced on-site in conformity with the existing topography (i.e., cut soil materials would be reused as fill material in other areas of the Project Site, and thus would not require off-site transport and disposal). Additional grading may also occur in connection with construction of individual single-family homes.

Construction is expected to occur between the hours of 7:00 a.m. and 6:00 p.m. on Monday through Friday, and during the hours of 8:00 a.m. to 4:00 p.m. on Saturday. These hours are reduced relative to what is allowed by the LAMC Noise Ordinance, which allows construction between the hours of 7:00 a.m. and 8:00 p.m. on non-holiday weekdays and between 8:00 a.m. and 6:00 p.m. on Saturdays. No construction would occur on Sundays or federal holidays per the LAMC. Additionally, per the City's Hillside Construction Regulation (HCR) requirements, hauling operations shall be conducted only on Monday through Friday, between the hours of 9:00 a.m. and 3:00 p.m., and hauling operations on Saturdays, Sundays, or state or federal designated holidays are strictly prohibited.

The number of construction workers and construction equipment would vary throughout the construction process in order to maintain an effective schedule of completion. Construction staging and parking are anticipated to occur entirely on-site.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- General Plan Amendment to change the land use designation to High-Medium Residential;
- Vesting Zone Change (VZC) to change the site zoning to the Benedict Canyon Specific Plan zone;
- Specific Plan to establish allowable uses, development standards, and design guidelines for development of hotel and residential uses on-site;
- Vesting Tentative Tract Map for the merger and resubdivision of the site into nine lots; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, haul route, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- Los Angeles Regional Water Quality Control Board General Construction Permit and Section 401 Water Quality Certification
- United States Army Corps of Engineers Section 404 Permit
- California Department of Fish and Wildlife Section 1602 Streambed Alteration Agreement

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

		Potentially Significant	Less Than Significant with Mitigation Incorporate	Less Than Significant	No
Exc Sec	ept as provided in Public Resources Code tion 21099 would the project:	Impact	d	Impact	Impact
a.	Have a substantial adverse effect on a scenic vista?			\boxtimes	
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
C.	In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			\boxtimes	

a. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista is generally defined as a publicly accessible panoramic viewpoint that provides expansive or notable views of a highly valued landscape and are typically identified in planning documents, such as a general plan. The Project Site is located in Benedict Canyon in the Santa Monica Mountains within the Bel Air-Beverly CPA. This portion of the Bel Air-Beverly Crest CPA is composed of residential uses and is characterized by a number of distinct residential neighborhoods associated with canyon and hillside areas. Although the City's General Plan land use map identifies scenic view sites, there are none within or adjacent to the Project Site. As there are no identified scenic vistas or view sites in proximity to the Project Site, implementation of the Project would have little potential to result in a substantial adverse effect on these scenic resources and impacts would be less than significant. Therefore, this issue will not be discussed in the EIR.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less Than Significant Impact. Based on a review of the California Scenic Highway Mapping System, the Project Site is not located within or in proximity to a State-designated scenic highway.⁷ The nearest state-designated scenic highways to the Project Site are State Route 1 (Pacific Coast Highway or PCH), located approximately 7.5 miles southwest of the Project Site and State Route 27 (Topanga Canyon Boulevard), located approximately 9 miles west. Given that the nearest state-designated scenic highways are located approximately 7.5 and 9 miles from the Project Site, respectively, as well as the presence of intervening topography, vegetation, and urban development, the Project Site is not visible from any portion of these roadways. As such, impacts related to damaging scenic resources within a state-designated scenic highway would be less than significant. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. Although the Project Site contains a large proportion of undeveloped open space under existing conditions, the site has been previously disturbed by prior residential development and grading activities. In addition, very little, if any, of the Project Site is visible from surrounding publicly accessible locations, and further, the site does not contain any notable features with aesthetic value that would affect the scenic quality of the area if removed. While the Project would introduce new structures and other improvements to the Project Site, these features would, with very limited exceptions, be shielded from view from surrounding publicly accessible locations by intervening topography, structures, and existing and proposed vegetation and landscaping. As such, the Project would have a very limited potential to substantially degrade the existing visual character or quality of the Project Site or its surroundings.

Applicable regulations governing scenic quality are contained within the City of Los Angeles General Plan Framework Element, Open Space Element, and Housing Element, as well as the Bel Air Beverly Crest Community Plan, and Citywide Design Guidelines. The General Plan Framework does not directly address the design of individual neighborhoods or communities, but it provides broad neighborhood design policies and implementation programs to guide local planning efforts that are further detailed in the respective community plans, in this case the Bel Air-Beverly Crest Community Plan. The General Plan Framework recognizes that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the public realm. The design of the Project is consistent in that the Project has been designed to conform, to the existing topography with structures interspersed with existing and proposed vegetation, while preserving a large proportion of the Project Site as naturally undisturbed area, and landscaped open space. More specifically, the Project would preserve approximately 5.2 acres of the Project Site as undisturbed natural open space, with another 19.4

⁷ California Department of Transportation, Scenic Highways. Available at: https://dot.ca.gov/programs/design/laplandscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed September 2019.

acres of landscaped (disturbed) open space, and walking paths provided on the Project Site. As such, the Project would not conflict with the General Plan Framework.

The Open Space Element of the General Plan states "It is not the intent of this plan to prohibit development of desirable open space if such development is consistent with the unique characteristics of land so designated." The Open Space Element does not provide specific measurable standards (such as height limits or floor to area ratios), however, it notes that development should be consistent with controls related to adjoining land uses, heights of structures, design, and appearance of structures, etc. for scenic corridors. While the Project Site is located in the canyons of the Santa Monica Mountains, it is not located along or in the viewshed of a scenic corridor, including Mulholland Drive (the closest designated scenic corridor to the Project Site). Therefore, the regulations contained in the Mulholland Scenic Parkway Specific Plan are not applicable to the Project Site.

Moreover, the Open Space Element encourages private development to provide ample landscaped spaces, malls, fountains, rooftop green areas and other aesthetic features that emphasize open space. Likewise, the Housing Element of the General Plan contains objectives and policies that promote open space in private development and increased access to parks, open spaces, and green spaces. This is accomplished through the preservation of approximately 5.2 acres of undisturbed natural open space and the provision of 19.4 acres of landscaped (disturbed) open space, roof top gardens, and a dog park as part of the Project. As such, the Project would not conflict with the provisions of the Open Space Element with regard to open space and scenic quality.

As discussed under Question I.a above, the Project has been designed to complement the Project Site's natural features and open space character. To this end, the Project incorporates features that are intended to minimize disruption of the current viewsheds surrounding the Project Site through implementation of the proposed Specific Plan, which includes development standards such as building height limits, set-backs, density, and other specifications, as well as design standards such as architectural styles, landscaping, and building materials. The Specific Plan would provide for consistent development throughout the Project Site through a unified design approach and consistent development regulations. Further, specific development pursuant to the proposed Specific Plan would be subject to the design review process prior to implementation, assuring that the Project-related improvements would be consistent with the Specific Plan, as approved.

The City of Los Angeles' General Plan Framework Element and each of the City's 35 Community Plans promote architectural and design excellence in buildings, landscaping, open space, and public space. They also stipulate that preservation of the City's character and scale, including its traditional urban design form, shall be emphasized in consideration of future development. To this end, the Citywide Design Guidelines have been created to carry out the common design objectives that maintain neighborhood form and character while promoting design excellence and creative infill development solutions. Among these guidelines are commercial/mixed-use and residential development guidelines. While these two sets of guidelines vary with regard to development type, the objectives of both are very similar and generally address the same suite of issues.

More specifically, the residential and commercial guidelines provide objectives including those related to (1) neighborhood context and building linkages, (2) distinguishable and attractive building design, (3) pedestrian connections within and around the Project, (4) minimizing the appearance of driveways and parking areas, (5) utilizing landscaping and open space opportunities to their full potential, and (6) improving the streetscape experience by minimizing visual clutter. With regard to these design objectives, the Project has been designed to incorporate existing site features including topography, vegetation, and open space to provide visual relief and minimize grading activities. Further, the Project will provide connectivity between the proposed uses (both residential and hotel uses) through the provision of private roads, sidewalks, and walking paths. The Project's hotel and residential structures and related improvements would be regulated by the proposed Specific Plan to provide visually cohesive and consistent development, and would not include any highly visible driveways or parking areas, all of which would be located within the hotel property or private residential lots with the exception of the primary Project access driveway off Hutton Drive.

The hotel component would include approximately 12.1 acres of open space, landscaping, and walking paths, of which approximately 1.2 acres would be preserved as undisturbed natural open space. The proposed residential component would include approximately 12.5 acres of open space, landscaping, and walking paths, of which approximately 4.0 acres would be preserved as undisturbed open space. The proposed hotel structures would be developed within the interior of the hotel portion of the Project Site, while residential uses would be developed individually on each private residential lot, and as such the proposed development would have little to no potential to adversely affect the streetscape experience along Project Site frontage(s) in the area or result in visual clutter. Therefore, the hotel (commercial) and residential components of the Project would be consistent with the Citywide Design Guidelines.

The Bel Air Beverly Crest Community Plan and the City's zoning do not preclude development at the Project site. However, the Project would require approval of a zone change to update the site zoning to Specific Plan. However, the Project's proposed zone change does not equate to a conflict with regulations governing scenic quality. The zone change request and the Specific Plan itself would be evaluated by decision makers in relation to conflicts with the surrounding land uses and the intended use of the Project site, including any visual conflicts.

Overall, based on the discussion above, the Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, or conflict with applicable zoning and other regulations governing scenic quality. Impact would be less than significant and this issue will not be analyzed further in an EIR.

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

Less Than Significant Impact. The Project Site lies in a residential area of the Benedict Canyon neighborhood. The neighborhood includes low levels of artificial light mostly composed of

streetlights and lighting around roadways. Light and glare impacts are typically associated with outdoor artificial light during the evening and nighttime hours. Glare may also be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. The Project would introduce new sources of nighttime illumination for architectural highlighting, parking, signage and security purposes, as well as new sources of potential glare from window glass.

New Project-related light sources, including streetlights, landscape lighting, architectural lighting, lighting from the hotel uses and rooftop terraces would be shielded and/or focused onto the Project Site per the City's Green Building Code requirements (LAMC Section 99.05.106.8) and thus is expected to be more ambient in nature and would only be used to provide the necessary illumination for general nighttime visibility (such as outdoor dining) and safety. The Project's residential structures would also generate new sources of light that would be visible. As with all residential light sources, light emanating from residential buildings is generally low-level and limited to the property itself, and given the very low density proposed for the residential portion of the Project Site, the overall increase in nighttime lighting in the area would be negligible.

The Project's hotel and residential components would comply with LAMC lighting regulations. Existing regulations prohibit any sign to be arranged or illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property (Chapter 1, Article 4.4, Section 14.4.4[e]). Existing regulations also require that no exterior light may cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units (Chapter 9, Article 3, Sec. 93.0117(b)). With compliance to the LAMC, the Project's lighting impacts would be less than significant.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic or glass curtain walls and trim. Although the Project design would include large panes of clear glass, Project would incorporate low-reflectivity window glass and architectural materials at glare-sensitive locations, if any, which would reduce the potential for substantial glare effects from reflected sunlight . Therefore, potential glare of reflected sunlight from building façades would not substantially alter the character of off-site areas surrounding the Project Site. Impacts associated with Project-induced glare would be less than significant. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
W	ould the project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?				
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				\boxtimes
C.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland.				\boxtimes

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

to non-agricultural use or conversion of forest

No Impact. The Project Site is currently developed with seven graded pads, existing residential structures, infrastructure improvements including roadways and a concrete bridge, and undeveloped natural areas. No agricultural uses or related operations are present on the Project Site or in the surrounding area. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps

land to non-forest use?

prepared pursuant to the Farmland Mapping and Monitoring Program.⁸ Since the Project would not convert farmland to non-agricultural uses, there would be no impact. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site includes zoning designations of RE15-1-H, RE20-1-H, and RE40-1-H, all of which allow for One-Family Dwellings, Parks, Playgrounds, Community Centers, Truck Gardening, Accessory Living Quarters, and Home Occupations as permitted uses.⁹ The Project Site is currently developed with seven graded pads, two existing residential structures, infrastructure improvements including roadways and a concrete bridge, and undeveloped areas. There are no agricultural uses or activities that occur within the Project Site or surrounding area. No agricultural zoning is present in the Project vicinity, and no nearby lands are enrolled under the Williamson Act.¹⁰ As such, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract, and there would be no impact. No further analysis of this topic in an EIR is necessary, and no mitigation measures are required.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned for Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As discussed in the response to Checklist Question II.b, above, the Project Site is zoned RE15-1-H, RE20-1-H, and RE40-1-H, all of which allow for One-Family Dwellings, Parks, Playgrounds, Community Centers, Truck Gardening, Accessory Living Quarters, and Home Occupations as permitted uses. The Project Site is currently developed with seven graded pads, existing residential structures, infrastructure improvements including roadways and a concrete bridge, and undeveloped areas. No forest land, timberland, or land zoned for timberland production is present on the Project Site or in the surrounding area.¹¹ As such, the Project would not conflict with existing zoning for forest land or timberland, and there would be no impact. No further analysis of this topic in an EIR is necessary and no mitigation measures are required.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As discussed in the response to Checklist Question II.c, above, the Project Site does not contain forest land in or around the Project vicinity. Accordingly, the Project would not result

⁸ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. Los Angeles County Important Farmland 2016. Published July 2017. Available at: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf . Accessed September 2018.

⁹ City of Los Angeles. Department of City Planning Generalized Summary of Zoning Regulations (CP-7150). Updated June 12, 2019. Available at https://planning.lacity.org/odocument/eadcb225-a16b-4ce6-bc94c915408c2b04/Zoning_Code_Summary.pdf. Accessed September 2019.

¹⁰ California Department of Conservation, Division of Land Resource Protection, Conservation Program Support. State of California Williamson Act Contract Land. Published 2017. Available at: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2016%20Statewide%20Map/WA_2016_11X17.pdf. Accessed September 2019.

¹¹ United States Department of Agriculture, U.S. Forest Service. Interactive Visitor Map. Available at: https://www.fs.fed.us/ivm/index.html. Accessed September 2019.

in the conversion of forest land to non-forest uses. Therefore, no impacts would occur and no mitigation measures would be necessary. Therefore, this topic would not be evaluated in an EIR.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As discussed above, in the responses to Checklist Questions II.a, II.c, and II.d, the Project Site and the immediate vicinity does not contain farmland, forest land, or timberland. Accordingly, the Project would not result in the conversion of farmland to non-agricultural uses or forest land to non- forest uses. Therefore, no impacts would occur and no mitigation measures would be necessary. Therefore, this topic would not be evaluated in an EIR.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the project:				
a.	Conflict with or obstruct implementation of the applicable air quality plan?	\boxtimes			
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				
C.	Expose sensitive receptors to substantial pollutant concentrations?	\boxtimes			
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			\boxtimes	

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

Potentially Significant Impact. The Project Site is located within the 6,700-square mile South Coast Air Basin (Basin) and is subject to the air quality management plans prepared by the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency primarily responsible for comprehensive air pollution control in the Basin and for reducing emission from stationary (area and point), mobile, and indirect sources. SCAQMD's Air Quality Management Plan (AQMP) is based on regional growth forecasts for the Southern California Association of Governments (SCAG) region. In addition to the AQMP, SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) serves as the region's comprehensive long-

range transportation plan and provides strategies to improve air quality through the integration of land use and transportation planning. Construction and operation of the Project includes excavation, hauling of dirt, and the introduction of new energy usage and mobile source emissions related to the approximately 325,650 square feet of development. Therefore, implementation of the Project has the potential to increase pollutant emissions, which could affect implementation of the applicable air quality plan. Therefore, this issue would be analyzed further in an EIR.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. As discussed in the response to Checklist Question III.a, above, the Project would result in increased air emissions from construction and operational traffic in the Basin, an air quality management area currently in non-attainment of Federal air quality standards for lead (Pb), O₃, PM₁₀ (particulate matter less than 10 microns in aerodynamic diameter), and PM_{2.5}, and State air quality standards for O₃, PM₁₀, and PM_{2.5}. As such, implementation of the Project could potentially contribute to cumulatively significant air quality impacts in combination with other existing and future emission sources in the Project area. Therefore, this issue would be analyzed further in an EIR.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors are land uses that are considered more sensitive to air pollutants than others. Schools, hospitals, residential uses, and convalescent homes are considered to be sensitive receptors. Residential uses are located in proximity to the Project Site in all directions. As discussed above, construction and operational activities related to the Project may increase air emissions above current levels, potentially exposing sensitive receptors to substantial pollutant concentrations. Therefore, this issue would be analyzed further in an EIR.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. Land uses that are associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. As a development consisting of residential and hotel uses, the Project does not include any of these uses that have been identified as being associated with objectionable odors. Thus, the Project is not expected to result in objectionable odors, or other nuisance emissions that adversely affect a substantial number of people.

Any objectionable odors or other emissions that may be generated during Project construction would be temporary and generally localized to the Project Site. Such odors or other emissions would not be sufficient to adversely affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. Therefore, impacts associated with objectionable odors or other nuisance emissions would be less than significant. Further analysis of this issue in an EIR is not necessary and no mitigation measures are required.

IV. BIOLOGICAL RESOURCES

Would the project:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?
- c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

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

Potentially Significant Impact. The Project Site is not located within a designated Los Angeles County Significant Ecological Area (SEA)¹² or other biological resource area. Generally, the

	\boxtimes			
nabitat modifications, on				

Less Than Significant

with

Mitigation

Incorporated

Less Than

Significant

Impact

No

Impact

 \square

 \square

Potentiallv

Significant

Impact

 \boxtimes

 \boxtimes

 \boxtimes

 \square

 \boxtimes

¹² Los Angeles County Department of Regional Planning. General Plan 2035. Figure 9.3 – Significant Ecological Areas and Coastal Resource Areas Policy Map. February 2015. Accessible at:

Project area is characterized by single-family residences, undeveloped areas, and areas with sloping hillside topography. The Project Site itself, is primarily undeveloped except for seven graded pads, two existing residential structures, infrastructure improvements including roadways and a concrete bridge. The remainder of the site that is undeveloped contains native and non-native vegetation including oak trees and other native trees. Based on the undeveloped nature of much of the Project Site and presence of suitable habitat areas, impacts to candidate, sensitive, or special-status species as identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) resulting from Project implementation cannot be precluded. As such, this issue would be analyzed further in an EIR based on a biological resource assessment of the Project Site that will be prepared to assess or analyze Project-related effects directly or through habit modifications on any candidate, sensitive, and/or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Potentially Significant Impact. The Project Site is primarily undeveloped except for seven graded unpaved terraces associated with previous development, two residential structures, and associated infrastructure improvements including roadways and a concrete bridge. The Project Site does not exhibit the typical physical characteristics that indicate the presence of riparian habitat or other sensitive natural communities. Nevertheless, portions of the site remain undeveloped and undisturbed with native trees and other potentially sensitive habitat areas and therefore the presence of these resources cannot be precluded. As noted in response IV a) above, a Project-specific biological resources assessment will be prepared to support an EIR. The biological resources assessment will contain and evaluation of Project-related effects, if any, upon sensitive habitats or other sensitive natural communities identified in the City plans, policies, and regulations or by the CDFW or USFWS. Thus, this issue would be further analyzed in an EIR.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Potentially Significant Impact. As discussed above, the Project Site is primarily undeveloped but does currently support seven graded pads, two existing residential structures and associated infrastructure improvements including roadways and a concrete bridge. The Project Site is generally located in a residential area that includes large lot single-family residences, undeveloped areas, and areas with sloping hillside topography. While the Project's physical characteristics and an initial review of Project-related data does not indicate the presence of state or federally protected wetlands, portions of the site remain undeveloped and it cannot be fully concluded that none exist without further investigation. As noted in the responses above, a biological resources assessment is being prepared to support the analysis to be provided in an

http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. Accessed September 2019.

EIR. The biological resources assessment will evaluate whether the site contains any federally protected wetlands as defined by Section 404 of the Clean Water Act. As such, this issue would be further analyzed in an EIR.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Potentially Significant Impact. Due to the portion of the Project Site containing undeveloped areas and because the Project Site is located within the Santa Monica Mountains, the Project has the potential to interfere with the movement of native resident wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Given the lack of suitable habitat within or near the Project Site (i.e., areas with standing water or perennial watercourses that allow upstream movement), impacts related to interference with the movement of migratory fish species are not expected to occur. A biological resource assessment of the Project Site would be prepared to assess or analyze any impact the Project may have on the movement of native resident or migratory wildlife species, any established native resident or migratory wildlife corridors, and any native wildlife nursery sites. This issue would be further analyzed in an EIR.

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

Potentially Significant Impact. The City recognizes the significance of certain species of native trees, which are protected under the Tree Preservation Ordinance (Chapter IV, Article 6 of the LAMC). In February 2017, Carlberg Associates conducted an inventory of protected and significant trees for the Project, the findings of which are presented in a Tree Survey Letter Report that is included as Appendix A of this Initial Study. According to a tree report the Project Site contains a total of 1,096 protected trees, including 752 native species trees considered protected by the City's Tree Preservation Ordinance, and another 344 trees that meet the City's criteria for significant trees. The Project includes the preservation of approximately 472 protected trees on the Project Site would be preserved. An additional, 260 protected trees are proposed to be removed, which are required to be replaced on-site at a 4:1 ratio per City requirements. Therefore, the Project would be required to provide 1,040 replacement protected trees. The Project proposes a total of 1,118 replacement protected trees on-site, for a net addition of 858 protected trees (or 78 more replacement protected trees than required by the LAMC). A total of 344 non-native (and considered invasive or fire hazards by the Project arborist) significant trees are located on the Project Site. Of these, 57 significant trees would be preserved on-site while 287 significant trees would be removed and replaced at a 1:1 ratio with native trees. A biological resource assessment of the Project Site would be prepared to assess or analyze the Project's consistency with local policies or ordinances protecting biological resources. This issue would be further analyzed in an EIR.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact. As discussed above, the Project Site is currently developed with seven graded pads, two existing residential structures, infrastructure improvements including roadways and a concrete bridge, and undeveloped areas. The Project Site is located within the City and based on a review of the Los Angeles County mapped Significant Ecological Areas (SEAs) indicates that the Project Site does not occur within a mapped SEA.¹³ As the Project Site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, no impact would occur and this issue would not be further analyzed in an EIR.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?			\boxtimes	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	\boxtimes			
c. Disturb any human remains, including those interred outside of dedicated cemeteries?			\boxtimes	

a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?

Less than Significant Impact. A historical resource is defined in Section 15064.5(a)(3) of the State CEQA Guidelines¹⁴ as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as those associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register of Historical Resources (CRHR), included in a

¹³ Los Angeles County Department of Regional Planning. General Plan 2035. Figure 9.3 – Significant Ecological Areas and Coastal Resource Areas Policy Map. February 2015. Accessible at: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. Accessed September 2019.

¹⁴ All references to the State CEQA Guidelines herein shall mean California Code of Regulations, Title 14, sections 15000 et seq.

local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.¹⁵ It should be noted that any resource currently listed in, or considered eligible for listing in, the National Register of Historic Places (NRHP) is automatically listed in the CRHR.

The Project Site is developed with seven graded pads, two existing residential structures, infrastructure improvements including roadways and a concrete bridge. The Project Site also contains undeveloped areas. Aerial photographs for the property and surrounding areas indicate that the Project Site appears undeveloped in 1947, but that two structures may have remained onsite from the early (or late) 1950s (associated with the existing on-site residential uses). An evaluation of these structures and features was conducted and is included in the Historic Resources Assessment included as Appendix B of this Initial Study. Historical background research demonstrates that the single-family dwellings at 2435 Hutton Drive and 9800 Wanda Park Drive, constructed in 1956 and 1926, respectively, are not associated with any significant historic events or person(s). The dwellings were not designed by master architects nor are either exemplary embodiments of an architectural style. Both dwellings were found not historically significant and therefore not eligible for the NRHP/CRHR or for local listing as a City Historic-Cultural Monument. Therefore, the dwellings at 2435 Hutton Drive and 9800 Wanda Park Drive are not considered historical resources for the purposes of CEQA. Thus, the Project will have no substantial adverse effects on historical resources per CEQA and no effects to historic properties per the NHPA in terms of cultural resources. Impacts to historic resources is less than significant and this issue will not require further evaluation in the EIR.

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

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the State CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. Substantial portions of the Project Site have been previously graded and developed with uses including single-family residences. Thus, surficial archaeological resources that may have existed in these locations at one time may have been previously disturbed. Nonetheless, Project construction would require grading and excavation activities for building foundations and subterranean parking in both previously disturbed and undisturbed portions of the Project Site with maximum excavation depths of up to 62 feet below ground surface, which could have the potential to disturb any existing but undiscovered archaeological resources. Therefore, this topic would be further analyzed in an EIR.

¹⁵ California Code of Regulations, Title 14, Chapter 3 – Guidelines for Implementation of the California Environmental Quality Act. Article 5. Preliminary Review of Projects and Conduct of Initial Study. Section 15064.5. Determining the Significance of Impacts to Archeological and Historical Resources. Available at: http://resources.ca.gov/ceqa/guidelines/art5.html. Accessed September 2019.

c. Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. As previously indicated, portions of the Project Site have been previously graded and developed with urban uses including single-family residences. According to the results of the cultural resources records search from the SCCIC, no known human remains have been identified within the Project Site or in the vicinity. Nonetheless, the Project Site would require grading and excavation activities for building foundations that would extend into soils that could be conducive to retaining human remains. While the uncovering of human remains is not anticipated, if human remains are inadvertently discovered during construction or the course of any ground disturbance activities, the Project would adhere to standard conditions of approval required by the City. Consistent with these standard conditions of approval, all construction or ground disturbing activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the human remains pursuant to California Public Resources Code Section 5097.98. If the human remains are determined by the County Corner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. Construction of the Project would be in accordance to all applicable laws and regulations, including applicable state and federal laws, and building regulations pursuant to the LAMC and LA Green Building Code that are intended to promote efficient utilization of resources and minimize environmental impacts. The Project would generate a new demand for consumption of energy resources to support a hotel with 59 guest units, 8

single-family homes, associated parking and infrastructure. Further analysis of the Project's demand on existing energy resources would be provided in an EIR.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. There are several state plans adopted for the purposes of promoting energy efficiency.¹⁶ As stated above, the Project includes the development of a hotel with 59 guestrooms, 8 single-family homes, associated parking and infrastructure. The hotel would be designed to meet the standards for a Leadership in Energy and Environmental Design (LEED) gold rating and at a minimum, the residences would be designed to achieve a LEED certification. The EIR will include an evaluation of project conflicts with state and local plans for renewable energy or energy efficiency.

¹⁶ California Renewable Portfolio Standard, the Clean Energy and Pollution reduction Act of 2015 (CA Senate Bill 350), the California Air Resources Board's "In-Use Off-Road Diesel Fueled Fleets Regulation" and "Advanced Clean Cars Program," California's Energy Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," and the California Green Building Standards Code, which is Part 11 of the California Code of Regulations, commonly referred to as CALGreen Code. Local plans adopted for the purposes of promoting energy efficiency include the City of Los Angeles Sustainable City Plan, the City of Los Angeles Green Building Code, and LADWP's 2017 Power Strategic Long-Term Resource Plan (SLTRP)

VII. GEOLOGY AND SOILS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wc	ould the project:				
a.	Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
	ii. Strong seismic ground shaking?			\boxtimes	
	liquefaction?				
	iv. Landslides?	\boxtimes			
b.	Result in substantial soil erosion or the loss of topsoil?	\boxtimes			
C.	Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	\boxtimes			

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed to prevent construction of buildings used for human occupancy on the surface of active faults, to minimize the hazard of surface rupture of a fault to people and buildings. Before cities and counties can permit development within Alquist-Priolo Earthquake Fault Zones, geologic investigations are required to show that sites are not threatened by surface rupture from future earthquakes. An active fault is defined as a fault with surface displacement within the last 11,000 years.

The Project Site is not located within a City-designated Fault Rupture Study Area, as identified in the City of Los Angeles Safety Element of the General Plan (City of Los Angeles, 1995). or within an Alquist-Priolo Earthquake Fault Zone.¹⁷ As such, there is little potential for surface fault rupture to occur at or near the Project Site. It should be noted that CEQA focuses on the Project's impact on the environment and not vice-versa (i.e., the potential effects of an earthquake on the Project); therefore, for a potentially significant impact to occur, the Project would have to include certain elements that are generally associated with exacerbating the effects of or inducing an earthquake that results in secondary seismic hazards such as surface fault rupture, ground shaking, ground failure, and other adverse effects. The Project does not include any activities which would contribute to the potential surface rupture a fault, such as vertical or horizontal drilling, liquid injection, or other such industrial activities. Therefore, no significant impact would occur, and no further analysis or discussion is required. This topic will not be further discussed in the EIR.

ii. Strong seismic ground shaking?

Less than Significant Impact. The Project Site is in the seismically active region of southern California and there are multiple known active faults in the region. The Project does not include the types of activities generally associated with inducing seismic events (injection wells and to a lesser extent fracking), it would not increase the frequency or magnitude of earthquakes or related ground shaking effects in the area. As noted in the previous response, CEQA focuses on the potential effects of the Project on the environment. The Project would have little potential to cause or exacerbate the effects of strong seismic ground shaking in the area, and therefore impacts in this regard would be less than significant and this topic will not be discussed in the EIR.

For the purposes of disclosure it is noted that Project-related structures and buildings would be required to be designed and built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]). The code contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the probable strength of ground motion. **iii. Seismic-related ground failure, including liquefaction?**

Less than Significant Impact. Liquefaction is a seismic hazard that can result in sudden and total loss of shear strength of soil (i.e., resistance to downward pressure from structures above), resulting in large and potentially catastrophic settlements and instability of structures above. Many factors influence a soil's potential for liquefaction during an earthquake. These factors include magnitude and proximity of the earthquake and earthquake source, duration of shaking, soil type,

grain size distribution and clay fraction content, soil density, effective overburden, location of groundwater table, and soils transmissivity. The subject site is located outside of areas where historical occurrences of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements. CalWest conducted a geotechnical investigation for the Project Site in 2019, the result of which are included a Geotechnical Engineering Investigation Report that is included in Appendix C of this Initial Study. In relation to liquefaction CalWest concluded that liquefaction and liquefaction-related settlement potential at the Project Site is low to nil. This conclusion is based on the groundwater conditions observed during field investigation, expected historic high groundwater elevation discussed in the Groundwater section above, and the subsurface material types and conditions.¹⁸ The Project would have a less than significant in relation to this issue and it will not be further evaluated in the EIR.

iv. Landslides?

Potentially Significant Impact. Areas that are most susceptible to earthquake induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits. According to the General Plan Safety Element, the Project Site is located within an earthquake-induced landslide area. CalWest has prepared a Geotechnical Engineering Investigation Report that will be summarized in the EIR and the report will be included as an appendix to the EIR (and is included as Appendix C of this Initial Study). This issue will be further analyzed in an EIR.

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

Potentially Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion are wind and flowing water. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not implemented. The Project Site is currently developed with seven graded pads, existing residential structures, infrastructure improvements including roadways and a concrete bridge. The Project Site also includes undeveloped areas. Construction activities, such as grading and excavation activities for building foundations and subterranean parking, would disturb onsite soils, which would have the potential to result in erosion and/or topsoil loss. Specifically, the Project would require 117,230 cubic yards (cy) of total grading, with the majority of graded soil being balanced on-site, and approximately 950 cy requiring off-site transport and disposal. Although the Project's construction and operation would require compliance with existing stormwater regulations, including the Los Angeles RWQCB's Municipal Separate Storm Sewer Permit (MS4 Permit) pursuant to the National Pollutant Discharge Elimination System (NPDES), under which the City is a permittee, and the City's Low Impact Development (LID) Ordinance (Sections 64.70.01 and 64.72 of Article 4.4 of Chapter VI and Section 64.72.05 of Article 1 of Chapter IX of the LAMC), implementation of the Project could result in erosion or loss of topsoil given the site topography and amount of proposed grading on-site. As such, the EIR would further evaluate impacts associated with erosion.

¹⁸ CalWest. March 2019. Geotechnical Engineering Investigation Report.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Potentially Significant Impact. Soils that are potentially unstable can fail when a new load is placed atop the soil such as the construction of a new building. Subsidence including differential settlement can damage structures built on the soil over time. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. Such movement can occur on slope gradients of as little as one degree but is more common in areas that contain an exposed slope. As described above, the Project Site is located within an earthquake-induced landslide area within the Beverly Hills Quadrangle (CDC, 1999). The potential for these hazards is typically determined based on the site-specific conditions of the underlying materials. The EIR would evaluate the potential for on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse caused in whole or in part by the project's exacerbation.

d. Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Potentially Significant Impact. Expansive soils shrink or swell as the moisture content decreases or increases. Volumetric changes associated with the shrinking or swelling can, over long periods of time, shift, crack or break structures or foundations built on such soils. According to the Project-specific geotechnical investigation prepared by CalWest (Appendix C of this Initial Study), the expansion potential of on-site soils is moderate. Therefore, the expansion potential of on-site soils will be further analyzed in an EIR.

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

No Impact. The Project would not include the development or use of septic tanks or alternative wastewater disposal systems. All development associated with the Project would connect to and be served by the City of Los Angeles Department of Public Works (DPW) existing public sewer system for wastewater discharge and treatment. No impacts related to septic systems would occur as a result of the Project, and this issue would not be analyzed further in an EIR.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. Portions of the Project Site has been previously graded and developed or paved. In addition, no unique geologic features are anticipated to be encountered during Project construction. However, the Project would require grading and excavation for building foundations and subterranean parking to a depth of up to 62 feet. Excavations to this depth could extend into geologic formations that could potentially contain undiscovered paleontological resources. Therefore, this topic would be analyzed further in an EIR.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
\boxtimes			
\boxtimes			

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

Potentially Significant Impact. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas (GHG) emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact. Nonetheless, the grading activities, construction activities and operation of approximately 327,610 square feet of floor area, and increase in vehicle traffic associated with the development of the Project, have the potential to generate GHG emissions that could significantly impact the environment. The EIR will evaluate the potential for the Project to generate a substantial increase in GHG emissions.

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

Potentially Significant Impact. The California Air Resources Board's (CARB) Climate Change Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction targets of 1990 emission levels by year 2020, 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by year 2050. In addition, SB 375, the Sustainable Communities and Climate Protection Act of 2008, was adopted by the legislature to reduce per capita vehicle miles traveled and associated GHG emissions from passenger vehicles. SCAG's 2020–2045 RTP/SCS identified per capita GHG reduction from passenger vehicles and light duty trucks in the region from 2020–2045.

On the local level, while not an adopted plan adopted for the purpose of the reducing emissions, but rather a mayoral directive, the City of Los Angeles' Green New Deal calls for cutting greenhouse gas emissions (GHGs) to 50 percent below 1990 levels by 2025; 73 percent below 1990 levels by 2035; and becoming carbon neutral by 2050. Furthermore, the City of Los Angeles includes policies regarding sustainability (as dictated by the City's General Plan). However, development of the Project, including construction and operational activities, would generate a net increase of GHG emissions within the region.

Construction and operation of the Project could increase GHG emissions at the Project Site compared to existing conditions. The Project's GHG emissions and consistency with applicable plans, policies, or regulations adopted to reduce GHG emissions would be evaluated in an EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wc	uld the project:		1		
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
C.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				\boxtimes
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			\boxtimes	
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	\boxtimes			

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Materials are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials

(corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). The term "hazardous material" is defined in California Health and Safety Code Section 25501 as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment. The code additionally states that a hazardous material becomes a hazardous waste once it is abandoned, discarded, or recycled. The transportation, use, and disposal of hazardous materials, as well as the potential releases of hazardous materials to the environment, are closely regulated through many state and federal laws.

Project-related construction activities would involve a range of typical construction activities that would include the use of common hazardous materials, substances, or chemicals such as fuels, oils, lubricants, paints, concrete, solvents, and glues. Without appropriate good housekeeping measures, there is a potential for an accidental release of hazardous substances and/or water pollutants during various construction activities.

All potentially hazardous materials used during construction or operation of the Project would be handled, stored, and disposed of in accordance with the manufacturers' specifications and applicable regulations. For example, as part of the Stormwater Pollution Prevention Plan (SWPPP) that must be prepared to obtain a General Construction Permit from the Los Angeles Regional Water Quality Control Board (RWQCB), measures will be identified to prevent discharges of hazardous materials. In addition, the SWPPP would establish the appropriate response to address accidental spills and releases. Such as, it is prohibited for storm or rainwater to have contact with discharges of construction materials and wastes such as paints and fuels. A variety of best management practices (BMPs) will be specified as part of the proposed project's SWPPP to prevent releases of hazardous substances

This routine General Construction Permit procedure would ensure that adequate precautions are in place to avoid a significant impact related to hazardous materials as a result of routine construction activities. As such, construction-related impacts would be less than significant.

The operation of the hotel would involve the use and storage of ordinary household or general commercial cleaners, solvents, pesticides for landscaping, petroleum products, and other substances utilized for cleaning and maintenance. Chemicals and detergents would be required for laundering and pool and spa maintenance. Overall, the minor level of hazardous materials usage commonly associated with the hotel operation and maintenance is commonplace and widely used in urbanized areas, and therefore would not constitute a significant hazard to the public or environment. The use of such chemicals would not be at the rate or characterization that would require special licensing of handling hazardous materials. It is noted that the restaurants may also use and dispose of grease and food oils, which are not considered hazardous but do require special handling and as such would be disposed of pursuant to applicable laws and regulations.

The residential land uses would also handle typical household hazardous wastes, such as pesticides and herbicides, janitorial products, paints, solvents, adhesives, other chemical materials used in building maintenance and interior improvements, automotive lubricants, small

combustion engine fuels and lubricants, expired pharmaceuticals, mercury thermometers, sharp or used needles, and electronic wastes from household and car batteries. No special permits would be required for such limited use or disposal of common agents and products. This level of hazardous materials usage, which is commonly associated with residential land uses is commonplace is residential areas and would not constitute a significant hazard to the public or environment. Residents can dispose of household hazardous materials for free at any of the Los Angeles County Sanitation District (LACSD)'s permanent disposal centers, and electronics can be disposed of at several private locations or electronic recycling events. The Los Angeles County Sanitation District and the Los Angeles County Department of Public Works sponsor household hazardous waste roundups, which are one-day events hosted on Saturdays at various locations around the county.

The use of any of these materials would be in small quantities and in accordance with the manufacturer's instructions for transport, use, storage, and disposal. Therefore, impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant and no mitigation is measures are required. This issue would not be further analyzed in an EIR.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. As noted in the previous response, the proposed mix of hotel and residential land uses are not expected to involve significant volumes of hazardous substances or wastes and would not involve any activities that have a potential to release hazardous emissions or hazardous wastes. Thus, there is a low risk of accidental releases of hazardous materials related to the typical daily activities occurring with the proposed land uses that would result in a significant hazard to the public or environment.

As discussed in the response above, the risk of an accidental release of hazardous substances during Project construction activities would be comparable to those of typical construction activities that could occur at any construction site. With implementation of good housekeeping practices and stormwater-related BMPs, construction-related impacts associated with the accidental release of hazardous materials into the environment would be less than significant.

In addition to construction, the Project includes the demolition of the two onsite residences and the associated ancillary structures. Given the age of the structures, the buildings may contain hazardous materials, such as asbestos containing materials (ACMs) and lead-based paint (LBPs), which, if present, would require remediation and abatement prior to demolition. Various regulations govern the renovation and demolition of structures where materials containing ACMs, and LBPs are potentially present. These requirements include SCAQMD Rules and Regulations pertaining to asbestos abatement including Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), and Construction Safety Orders 1529 (pertaining to asbestos) and 1532.1 (pertaining to lead) from Title 8 of the CCR. In the event that the onsite structures contain either ACMs or LBPs, the contractor is required to have such materials handled by a qualified and licensed professional in accordance with a remediation plan that would be prepared,

reviewed, and approved by the Department of Building & Safety prior to the issuance of demolition permits.

Therefore, the potential impact of hazards and hazardous materials during construction and operational activities would not be evaluated in an EIR.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. According to the City of Los Angeles Zone Information and Map Access System (ZIMAS), are no existing or proposed schools located within one-quarter mile of the Project Site.¹⁹ The nearest Los Angeles Unified School District (LAUSD) schools to the Project Site are the Roscomare Road Elementary School located at 2425 Roscomare Road (1.9 miles west), Wonderland Avenue Elementary School located at 8510 Wonderland Avenue (2.9 miles east), and West Hollywood Elementary School located at 970 Hammond St (3.1 miles southeast). As described above, during construction, the Project would involve the temporary use of potentially hazardous materials; however, all such materials would be used and stored in accordance with all federal, state, and local standards and regulations for hazardous materials handling. During operation of the Project, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for hotel and residential uses and would be used in limited quantities, posing no risk to schools in the Project vicinity. Therefore, no impacts would occur in this regard.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project Site by Converse Consultants in May 2019, which is included in Appendix D of this Initial Study.²⁰ As discussed in the Phase I ESA, the Project Site is not included on a list of hazardous materials sites pursuant to Government Code section 65962.5, and no listed properties are located in proximity to the Project Site such that indirect adverse effects related to hazardous materials sites could result from Project implementation. Therefore, no impact would occur. This topic would not be further evaluated in an EIR.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project Site is located approximately 6.7 miles northeast of the nearest public airport, Santa Monica Airport. The Los Angeles International Airport is located 11.9 miles south of the Project Site. The Project is not located within two miles of an existing public airport or public use airport and is not located within an airport land use plan. Therefore, the Project would not result in a safety hazard or excessive noise for people working or residing in the Project area

¹⁹ Zone Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/. Accessed August 2020.

²⁰ Converse Consultants. Phase I Environmental Site Assessment Report 9712 Oak Pass Road Los Angeles, California. May 10, 2019. This document is included in Appendix D of this Initial Study.
associated with airport-related activities or operations. Therefore, no impacts and no mitigation measures are required. This topic would not be further evaluated in the EIR.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The Project Site is generally located in a residential area that includes single-family residences, undeveloped areas, and areas with sloping hillside topography. According to the Safety Element of the City of Los Angeles General Plan, and the County of Los Angeles Department of Public Works, the primary disaster routes to the Project Site are U.S. 101 to the north, Santa Monica Boulevard to the south, and the 405 Freeway to the west. Secondary disaster routes in the area include Ventura Boulevard to the north, Beverly Boulevard to the south, Laurel Canyon Boulevard to the east and Beverly Glen Road to the west.

Implementation of the Project would not adversely affect existing emergency access routes. The Project does not propose alterations to the public Right-of-Way such as street vacations, or other activities which would prohibit emergency response plans. Project Site ingress and egress would be modified to create a new access from Hutton Drive for the hotel and secondary emergency access from Oak Pass Road. Wanda Park Drive would provide access to the residential component as well as emergency access to the hotel site. Vehicular access and circulation would avoid conflicts with traffic movements on local roadways and would facilitate the provision of onsite emergency services. During construction, adjacent streets may be temporarily affected due to construction activity, such as temporary lane closures. Such occurrences would be implemented in accordance with a Construction Traffic Management Plan, which would serve to maintain emergency vehicle access throughout construction activities, among other functions. The Citywide Temporary Traffic Control Division of the Los Angeles Department of Transportation (LADOT) reviews and oversees implementation of short-term (less than 72 hours) temporary traffic control plans to ensure compliance with federal and state standards and to provide for the safe efficient movement of road users.

Once operational, subject to review and approval of Project circulation plans by the LAFD, the Project would comply with applicable building codes and the California Fire Code that outline the minimum width for drives and access roads, turning radii and roadway geometry, proper striping and signage, and all other site design features that are required to facilitate emergency access and adequate response. These Project features, together with required regulatory compliance, would avoid the need to prepare new or modify existing emergency response or evacuation plans. The Project would include vehicular access improvements on the Project Site, and all proposed streets would meet applicable design requirements for emergency access. For further discussion, refer to Section XVII, *Transportation*, of this Initial Study.

Therefore, the Project's required adherence to the required plans and codes would reduce the Project's would not Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would have less than significant impacts.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Potentially Significant Impact. The Project Site is generally located in a residential area that includes single-family residences, undeveloped areas, and areas with sloping hillside topography. An examination of the City of Los Angeles General Plan's Safety Element Exhibit D Selected Wildfire Hazard Areas Map shows that the Project Site is located within a Selected Wildland Fire Hazard Area. Specifically, the Project Site is in the Mountain Fire District area. Further, according to ZIMAS, the Project Site is located within a City-designated Very High Fire Hazard Severity Zone.²¹ This Project would place people in structures in a designated wildfire hazard area and impacts may be potential significant. Further discussion in included under Section XX, Wildfire, of this Initial Study and this topic would be evaluated in an EIR.

X. HYDROLOGY AND WATER QUALITY

			Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wc	ould the p	roject:				
a.	Violate discharg substant quality?	any water quality standards or waste e requirements or otherwise ially degrade surface or ground water			\boxtimes	
b.	Substant interfere such that groundw	tially decrease groundwater supplies or substantially with groundwater recharge at the project may impede sustainable vater management of the basin?				
	i.	Result in substantial erosion or siltation on- or off-site;			\boxtimes	
	ii.	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
	iii.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
	iv.	Impede or redirect flood flows?				\bowtie

²¹ City of Los Angeles. Zone Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/. Accessed September 2019.

- d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

		\boxtimes
	\boxtimes	

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. The regulatory setting for surface water quality considers if discharges create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for receiving water body. Impact analysis considers whether a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems.

The Project Site is within the Los Angeles Regional Water Quality Control Board (RWQCB) jurisdiction. Applicable regulations include compliance with NPDES permitting system, Standard Urban Storm Water Mitigation Plan (SUSMP), LAMC Article 4.4, and the low impact development (LID) requirements, which reduce potential water quality impacts during the construction and operation of a project.

Project construction activities would include, demolition of existing structures and other improvements, grading and excavation activities for building foundations and subterranean parking, and construction of new hotel and residential structures. Sediment associated with earthmoving activities and exposed soil is the most common pollutant associated with construction sites. Other pollutants associated with construction include debris, trash, and other materials generated during construction activities; hydrocarbons from leaks or spills of fuels, oils, and other fluids associated with construction equipment; and paints, concrete slurries, asphalt materials, and other hazardous materials. Construction and operational Best Management Practices (BMPs) implemented as part of the Project's Stormwater Pollution Prevention Plan (SWPPP), the City's LID Ordinance and SUSMP, and good housekeeping practices are intended to preclude sediment and hazardous substances from entering stormwater flows. Typical BMPs include, but are not limited to, the use of or implementation of water bars, silt fences, staked straw bales, and avoidance of water bodies during construction. Additional source-control BMPs might also be required to prevent runoff contamination by potentially hazardous materials and eliminate non-stormwater discharges.

Compliance with the Construction General Permit, SWPPP, and NPDES requirements minimize the potential for contributing sources of polluted runoff during construction. Further, these existing regulations, programs, and policies are designed to minimize off-site transportation of water- and wind-borne erosion. Compliance with these measures is considered to maintain the surface water quality of receiving waters at levels acceptable to the SWRCB, including Total Maximum Daily Load (TMDL) limits applicable to the Ballona Creek Watershed. Moreover, the required adherence to these measures would effectively address construction-related activities such that no water quality standards or waste discharge requirements are violated.

As an urban development, the Project would add typical non-point source pollutants to stormwater runoff, primarily due to runoff from impervious surfaces where a variety of pollutants can collect over time, such as driveways, streets, roofs, patios, and other paved surfaces. Landscaped areas can also generate water pollutants such as fertilizer and weed control agents, as well as green waste from landscape maintenance. Untreated stormwater runoff degrades water quality in surface waters and groundwater and can affect drinking water, human health, and plant and animal habitats. As previously noted, several measures to protect water quality and limit discharges are directed and implemented through both the preparation of various plans and adherence to established programs. The Project would be required to demonstrate compliance with such plans and programs as discussed below.

As part of the NPDES program, municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdiction (MS4 permits). Since the Project proposes to discharge runoff into the local municipal storm drain system it must demonstrate that the runoff would be consistent with the standards set forth in the MS4 permit. In part, adherence to the MS4 permit requires integrating LID design principles to lessen water quality impacts. Overall, LID strategies are designed to protect surface and groundwater quality, maintain the integrity of ecosystems, and preserve the physical integrity of receiving waters by managing stormwater runoff at or close to the source.

In order to meet the LID requirements, pursuant to the City's Stormwater LID Ordinance (Ordinance No. 181899, updated September 2015 [Ordinance No. 183833]), the City of Los Angeles requires that the runoff from the impervious areas from the 85th percentile, 24-hour rain event or the ³/₄-inch, 24-hour rain event, whichever is greater, be infiltrated, captured and reused, or at least treated to remove contaminants. The Project would incorporate on-site stormwater conveyance, retention, and treatment facilities in order to comply with the requirements of the City's Stormwater LID Ordinance. Thus, through implementation of applicable NPDES and LID features in the Project's design, consistent with the requirements of the City's Stormwater LID Ordinance, the Project would not result in a violation of any water quality standards or waste discharge requirements, would not create substantial additional sources of polluted runoff, and would not substantially degrade water quality; impacts would be less than significant.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. LADWP is the water purveyor for the City. Water is supplied to the City from three primary sources, including the Metropolitan Water District's Colorado River and Feather River supplies (57%, includes Bay Delta 48%, Colorado River 9%), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (29%), local groundwater from the San Fernando groundwater basin (12%), and recycled water (2%).²² Based on the City's

 ²² Los Angeles Department of Water & Power. 2015 Urban Water Management Plan. Exhibit ES-O - LADWP Supply Reliability
 FYE
 2011-2015
 Average.
 Available
 at:

most current Urban Water Management Plan (UWMP), in 2014 and 2015, LADWP had an available water supply of roughly 611,800 acre-feet, with approximately 18 percent coming from local groundwater.²³ Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins. The Project does not propose groundwater withdrawal; however, with respect to groundwater recharge, some currently pervious surfaces would be replaced by impervious surfaces due to the increase in development on the Project Site. However, given the steep topography, elevation, and geology of the Project Site, it is unlikely that notable groundwater recharge currently occurs on-site or elsewhere in the Santa Monica Mountains.²⁴ Furthermore, the Project Site does not overlie any aquifers within the Los Angeles Basin.²⁵ Therefore, it is anticipated that Project implementation would not result in measurable changes in groundwater recharge rates or available groundwater supplies, and impacts would be less than significant. This topic would not be analyzed further in an EIR.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. Currently the Project Site includes two residential units roads, graded terraces, and other remnants of past development on-site. However, most of the site remains undeveloped in its natural state. The Project would demolish the existing site development and introduce a hotel with 19 buildings, two parking structures, and eight single-family residential homes and other improvements to the Project Site. Construction of the Project has the potential to temporarily alter the localized drainage pattern at the Project Site due to ground-disturbing activities, such as grading and excavation for subterranean parking, construction of new building foundations, and trenching for utility improvements. Such alterations in the drainage pattern may temporarily result in erosion or siltation and/or increase the rate or amount of surface runoff if substantial drainage is rerouted. If a precipitation event were to occur during these activities, exposed sediments may be carried off-site and into the local storm drainage system, thus increasing siltation. However, as noted previously, construction activities would be required to comply with the provisions of a Project-specific SWPPP as required by the RWQCB General Construction Permit. Implementation of applicable BMPs in accordance with the SWPPP would preclude the potential for substantial erosion and sedimentation effects during

https://www.ladwp.com/cs/idcplg?ldcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelection Method=LatestReleased. Accessed September 2019.

²³ Los Angeles Department of Water & Power. 2015 Urban Water Management Plan. Exhibit ES-2 - Service Area Reliability Assessment for Average Weather Year. Available at: https://www.ladwp.com/cs/idcplg?ldcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelection Method=LatestReleased. Accessed September 2019.

²⁴ CalWest Geotechnical Consulting Engineers. Updated Geotechnical Engineering Investigation Report, Proposed Multi-Structure Luxury Hotel Complex and Custom Single Family Residential Development, Lots 1-9, Vesting Tentative Tract Map No. 74908, 9712 Oak Pass Road (AKA 9750 & 9800 Wanda Park Drive), Bel Air Area, City Of Los Angeles, California. March 2019. This document is included in Appendix C of this Initial Study.

²⁵ LA River Index. Aquifers. Los Angeles River Watershed Groundwater Basins. Available at: http://riverlareports.riverla.org/water-recharge/aquifers/. Accessed September 2019.

construction activities. As such, construction-related impacts in this regard would be less than significant.

A variety of impervious surfaces would be constructed, including the proposed structures and associated access drives and roadways, all of which would increase the amount and rate of runoff generated on-site. The increase in runoff, however, would be required to be captured and retained on-site via LID-compliant structures, as required by the City's Stormwater LID Ordinance.

More specifically, to maintain the amount of runoff to less than equal that of the existing site conditions, the Project includes the installation of two on-site detention tanks. Other features include individual stormwater treatment and detention systems for the individual single-family lots, riprap structures to control and minimize velocity of runoff, catch basins, and sediment traps. Collectively these features would provide a combined effect of minimizing erosion through the control of stormwater volumes and velocities and the collection of sedimentation prior to being discharged into off-site storm drain infrastructure. At the time of site design review and prior to the issuance of certificates of occupancy, the adequacy of these features to capture and treat runoff and minimize sedimentation would be subject to review and approval by the City Department of Public Works. Thus, while stormwater flows would be altered by both modifying the current stormwater drainage patterns and the introduction of additional impervious surfaces, the Project would provide appropriate LID features to reduce generation of pollutants on-site and limit the potential release of pollutants to off-site facilities. Thus, impacts in relation to the alternation of an existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces that would result in erosion of siltation are less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less than Significant Impact. As discussed under Checklist Questions a) and c i), the Project without measures to reduce the impacts, the Project may substantially increase the amount of runoff and subsequently flooding. However, compliance with the NPDES and LID requirements would serve to reduce any potential impacts to less than significant.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. Stormwater runoff currently flows into the City's storm drain system located in Hutton Drive. These storm drain lines are owned and maintained by the City. As discussed above, stormwater also percolates naturally into off-site soils. Per the Project Preliminary Hydrology Study (Appendix E of this Initial Study), implementation of the proposed LID features, including on-site detention facilities, would result in stormwater flows equal to or less than those associated with pre-Project conditions. Based on compliance with LID requirements, Project-related stormwater flows entering the City's storm drain system would not exceed flow volumes under existing conditions. As such, the Project would have little potential to exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional

sources of polluted runoff, and impacts would be less than significant. Therefore, this topic will not be analyzed further in an EIR.

iv. Impede or redirect flood flows?

Less Than Significant Impact. According to the City's General Plan Safety Element, the Project Site is not within a City-designated 100-year flood zone. Further, the Project Site does not have the physical characteristics (i.e., topography, low-lying areas, etc.) that would lend to flooding. More specifically, the steep and undulating topography with hillsides and canyons does not include lowland areas where flood waters could collect. Thus, presently the site does not support conditions for flooding, and is not located within a designated flood zone, and therefore Project implementation would not impede or redirect flood flows. Likewise, given compliance with LID requirements, stormwater flows discharged from the Project Site would not exceed pre-Project discharges to off-site facilities, which would minimize the potential for adverse off-site flooding impacts. Impacts would be less than significant, and this issue will not be further evaluated in an EIR.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The City's General Plan Safety Element does not identify the Project Site as being located within a City-designated 100-year flood zone.²⁶ Additionally, a review of the Project location on FEMA's Flood Map Service Center shows that no portion of the Project Site is located in a Selected Flood Map Boundary.²⁷

Seiches are seismically or wind induced tidal phenomena that occur in enclosed bodies of water. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. The Project Site is located approximately 8 miles northeast of the Pacific Ocean at an elevation of over 750 feet above sea level. According to the City of Los Angeles General Plan's Safety Element, the Project Site is not located within a Tsunami Inundation Zone and there are no inland water bodies close enough to the Project Site to pose a flood hazard due to a seiche.

Moreover, as discussed in Section IX, Hazards and Hazardous Materials, of this Initial Study, it is unlikely that Project-related activities would result in pollutants would being released into the environment. Therefore, since the Project Site is not in a flood zone, tsunami inundation zone, or in an area susceptible to seiche effects, no impact would occur, and this topic will not be evaluated in an EIR.

²⁶ City of Los Angeles General Plan Safety Element. Safety Element Exhibit G – Inundation & Tsunami Hazard Areas in the City of Los Angeles. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf. Accessed September 2019.

²⁷ United States Federal Emergency Management Agency. National Flood Hazard Layer (NFHL) Viewer. Available at: https://msc.fema.gov/portal/home. Accessed September 2019.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As specified above, the Project would comply with LAMC Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control and would be required to obtain coverage under the NPDES General Construction Activity Permit. In addition, the Proposed Project would not adversely impact a groundwater management plan because the runoff would not notably impede groundwater replenishment in local basins. As noted above in response X.a, above, Project implementation would not have the potential to result in adverse impacts to surface water and groundwater quality, which could be considered a conflict with or obstruction of the Water Quality Control Plan for the Los Angeles Basin (Basin Plan). As such, impacts would be less than significant, and this topic will not be further evaluated in an EIR.

XI. LAND USE AND PLANNING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	buld the project:				
a.	Physically divide an established community?			\boxtimes	
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding	\boxtimes			

a. Physically divide an established community?

or mitigating an environmental effect?

Less Than Significant Impact. The Project Site is located in the Benedict Canyon area of the Santa Monica Mountains within the Bel Air-Beverly Crest CPA of Los Angeles. This portion of the Bel Air-Beverly Crest Community Plan Area is composed of residential uses and is characterized by a number of distinct residential neighborhoods associated with the canyon and hillside topography. The Project Site is currently developed with seven graded pads, two existing residential structures, infrastructure improvements including roadways and a concrete bridge. The remainder of the Project Site is comprised of undeveloped areas.

The Project would involve the construction of a new 59-room hotel to be housed within 18 separate structures, two parking structures, and 8 single-family residential units, all within the boundaries of the Project Site. There is no separation of uses or disruption of access between land uses around the Project Site that would occur as a result of the Project. The Project Site is privately owned, and the property does not currently provide public physical connections across the property that are accessible to surrounding uses. The land uses proposed by the Project does not include public right-of-way alterations, and as such, implementation of the Project would not have the potential to physically divide a community due to the construction or operation of the proposed uses. Impacts would be less than significant, and no mitigation measures are required. As such, this topic would not be further evaluated in an EIR.

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

Potentially Significant Impact. The Project Site is located within the Bel Air-Beverly Crest CPA of the City Los Angeles. The Project Site includes zoning designations of RE15-1-H, RE20-1-H, and RE40-1-H.²⁸ While the proposed development involves land use policy and zoning amendments, the physical development of the Project Site includes site grading totaling 117,230 cubic yards and the removal of trees and habitat, and may have the potential to result in significant impacts in terms of conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the EIR, would analyze the Project for consistency with any applicable goals, objectives, and policies of the City's General Plan, the Bel Air-Beverly Glen Community Plan, and the LAMC, among other plans and policies.

XII. MINERAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	buld the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				\boxtimes
b.	Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan				\boxtimes

or other land use plan?

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project Site is generally located in a residential area that includes single-family residences, undeveloped areas, and areas with sloping hillside topography. According to the County of Los Angeles General Plan, Special Management Areas map, (which maps resources throughout the County, including the City), the Project Site is not located in a Mineral Resource Zone.²⁹ The Project Site is not used for mineral extraction and is currently developed with seven graded pads, two existing residential structures, infrastructure improvements including roadways and a concrete bridge. The remainder of the site consists of undeveloped areas. Thus, implementation of the Project would not result in the loss of availability of known mineral resources that would be of value to the region and the residents of the state, nor would it result in the loss of availability of a locally-important mineral resource recovery site. Therefore, there would be no impact to mineral resources. This issue would not be further evaluated in an EIR.

²⁸ City of Los Angeles. Zone Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/. Accessed September 2019.

²⁹ State of California, Department of Conservation, The Resources Agency, Division of Mines and Geology. Mineral Land Classification Map, Beverly Hills Quadrangle. Dated May 25, 1979. Available at: ftp://ftp.conservation.ca.gov/pub/dmg/pubs/sr/SR_143/PartII/Plate_2-5.pdf. Accessed September 2019.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. Refer to Checklist Question XII.a, above. Therefore, the Project would not result in the loss of availability of a locally-important mineral resource recovery site. This topic would not be further evaluated in an EIR.

XIII. NOISE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	ould the project result in:				
a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b.	Generation of excessive groundborne vibration or groundborne noise levels?	\boxtimes			
C.	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the				\boxtimes

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

project expose people residing or working in the

project area to excessive noise levels?

Potentially Significant Impact. Construction of the Project would require the use of heavy equipment during the demolition, grading, and excavation activities, installation of new utilities, paving, and building fabrication for the proposed structures. During operation of the Project, noise levels generated at the Project Site would mainly occur from new mechanical equipment such as heating, ventilation, and air conditioning (HVAC) units, parking facilities, loading and unloading of trucks, resident, visitor, and employee activities on the Project Site, and traffic related to the proposed uses. Nearby sensitive uses, such as single-family homes within 500 feet of the Project's residential uses, could potentially be affected by a substantial temporary or permanent increase in ambient noise levels. The Project's construction noise and operational noise would be compared to the ambient noise measurements recorded at the Project Site and compared to the noise level standards set forth in the City of Los Angeles General Plan Noise Element and the City of Los Angeles Noise Ordinance to determine whether construction activities and/or operational activities generate excess noise levels. Therefore, this issue would be further analyzed further in an EIR.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of surfaces is called groundborne noise. Construction of the Project may generate temporary substantial groundborne vibration and noise due to site grading, clearing activities, and haul truck travel. In addition, Project construction would require pile-driving. Conversely, operation of the hotel and residential uses, would not likely result in excessive vibration or groundborne noise. However, since the Project would have the potential to generate groundborne vibration and groundborne noise levels during short-term construction activities that may impact the nearest existing residences, which are considered sensitive receptors, this issue will be evaluated further in an EIR.

c. For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not located within two miles of an airport or within an area subject to an airport land use plan. The nearest airport to the Project Site is the Santa Monica Airport, approximately 6.7 miles southwest of the Project Site. Thus, no impact would occur and no further evaluation of this topic is required.

Less Than Significant

XIV. POPULATION AND HOUSING

		Potentially Significant Impact	with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	ould the project:				
a.	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			\boxtimes	

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. Growth inducing impacts are a result of those characteristics of a project that foster or encourage population and/or economic growth. These characteristics include adding residential units, expanding infrastructure, or generating employment opportunities. The Project's addition of 8 residential units would directly induce growth. Specifically, based on the Citywide average (year 2016) occupancy of 3.32 persons per

household, ³⁰ the Project would result in the addition of approximately 27 new residents notwithstanding the current residents of the existing two residential units on-site (approximately 7 residents based on the Citywide average of 3.32 persons per household).

The Bel Aire-Beverly Crest Community Plan anticipates planned population growth and establishes housing and land use goals.³¹ It follows that the residential portion of the Project would not induce substantial unplanned population growth in the Bel Air-Beverly Crest Community Plan even though it involves the addition of 8 single-family homes.

If the employment opportunities associated with the construction of the Project or the operation of the hotel attract people to relocate to the City, the Project would indirectly induce population growth. The hotel component's anticipated 100 full time equivalent employees are anticipated to live in the greater Los Angeles area and thus are not expected to relocate to the Project area for employment in sufficient numbers that a notable increase in population would result. Similarly, temporary construction workers employed during the construction of the proposed hotel and residential uses are anticipated to live within the City or other nearby jurisdictions and thus they would not be expected to relocate to the Project area for short-term employment associated with Project implementation.

SCAG develops demographic forecasts as part of its RTP/SCS. The current RTP/SCS, adopted in May 2020, is for the planning period 2020–2045 and indicates that total Citywide households numbered 1,367,000 in 2016 and forecasts a total of 1,793,000 households in 2045 (SCAG 2020). According to the SCAG City of Los Angeles 2019 Local Profile, the City had a population of 4,059,665 that year. Accordingly, given the limited direct population growth, the lack of indirect population growth as a result of new employment opportunities, and beneficial employment growth associated with the Project, a detailed analysis that compares the Project's contribution to population, housing, and employment growth to SCAG's RTP/SCS, the Bel Air-Beverly Crest CPA, and Citywide projections and policies regarding future development is not warranted. The Project's contribution to population is required. This issue would not be further evaluated in an EIR.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. The Project Site is currently developed with two existing singlefamily homes, seven graded pads, and infrastructure improvements including roadways and a concrete bridge. The remainder of the Project Site consists of undeveloped areas. The Project would remove the existing on-site single-family homes. Further, the Project is proposing to develop 8 single-family residential units. As such, Project implementation would not displace a substantial number of existing people or housing which would necessitate the construction of

³⁰ Personal Communication with Jack Tsao, Los Angeles Department of City Planning Demographics Unit. June 12, 2020.

³¹ City of Los Angeles Department of City Planning. Bel Air-Beverly Crest Community Plan. Adopted November 1996. Available at: https://planning.lacity.org/complan/westla/barpage.htm. Accessed September 2019.

replacement housing elsewhere. Therefore, impacts would be less than significant, and no mitigation measures are required. This issue would not be further analyzed in an EIR.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Fire protection?	\boxtimes			
b.	Police protection?	\boxtimes			
c.	Schools?			\boxtimes	
d.	Parks?			\boxtimes	
e.	Other public facilities?			\bowtie	

a. Fire protection?

Potentially Significant Impact. Fire prevention, fire protection and emergency medical services (EMS) for the City of Los Angeles are provided by the Los Angeles Fire Department (LAFD). The Project area is served by LAFD Fire Station No. 99 located approximately 1.1 miles north-northwest of the Project Site at 14145 Mulholland Drive.³² The Project includes 8 single-family homes and 59 hotel rooms. Thus, the Project could potentially increase the demand for LAFD services. At this time, it is undetermined whether the Project would increase demand to the extent that a new facility would need to be constructed to maintain acceptable service. Therefore, this issue would be further analyzed in an EIR.

b. Police protection?

Potentially Significant Impact. Police and law enforcement services for the City of Los Angeles are primarily provided by the City of Los Angeles Police Department (LAPD). The Project Site is located within the Beverly Crest neighborhood which is served by the West LA Community Police Station located at 1663 Butler Avenue, Los Angeles, approximately 5.5 miles southwest of the Project Site. The Project includes 8 single-family homes and 59 hotel rooms. the development of the Project could result in an increase of on-site residents, visitors, and employees to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. At this time, it is undetermined whether the Project would increase demand to the extent that a new facility would need to be constructed to maintain acceptable service levels. Therefore, this issue would be further analyzed in an EIR.

³² Los Angeles Fire Department. Find Your Station. Available at: https://www.lafd.org/fire-stations/station-results. Accessed September 2019.

c. Schools?

Less Than Significant Impact. The Project Site is located within the jurisdiction of the Los Angeles Unified School District (LAUSD). Specifically, the Project Site is in the Local District West. Although the Project would introduce new residents and employees to the Project Site, which would in turn generate new students who would attend nearby LAUSD schools, such student generation would be minimal. Nonetheless, the Project would be required to pay developer fees to LAUSD, which are based on the square footage of development proposed pursuant to the LAUSD 2018 Developer Fee Justification Study.³³ Payment of developer fees is considered full mitigation for school facility impacts according to LAUSD. Therefore, with payment of applicable developer fees to LAUSD, the Project's demand for school facilities would not trigger the need to construct new or expanded school facilities and impacts in this regard would be less than significant. Therefore, no mitigation is necessary, and this issue would not be analyzed in an EIR.

d. Parks?

Less Than Significant Impact. The Los Angeles Department of Recreation and Parks (LADRP) are responsible for the provision, maintenance, and operation of public parks and services in the City. Recreational parks and facilities located within two miles of the Project Site include Beverly Glen Park and Briarwood Park located approximately 0.45 miles west and 0.65 miles northwest of the Project Site, respectively. Although the Project would introduce new residents, hotel guests, and employees to the Project Site, the Project's impact on demand for park facilities would be nominal. The hotel is not considered to increase the demand for park services as the guests are not a permanent population, and the hotel employees (as discussed in Section XIV, Population and Housing, above) are expected to be part of the existing local workforce (thereby not creating a new demand as a result of increase in population), Furthermore, the hotel would include a series of landscaped areas, foot paths, and open space that would be available to guests and employees alike, and thus operation of the hotel is not expected to result in a substantial increase in demand for, or use of, public parks in the area. Thus, the Project's impacts in relation to park services are limited to 8 residential units. The residential units would include ample outdoor space for recreational activities within each proposed lot as well as the provision of an on-site dog park accessible by on-site residents and hotel guests. Project approval would require the payment of park fees to address impacts to park facilities from additional residential population in the area. The project applicant is required to pay all Development Impact Fees (Quimby fees per LAMC 17.12 and Dwelling Unit Construction Tax per LAMC Section 21.10.3(a)(1)) prior to the issuance of a certificate of occupancy. Payment of these fees would offset the project's incremental impact on the City's parkland resources and is considered mitigation in full; thus, the project would have a less than significant impact on the provision of parks services. Therefore, this issue would not be analyzed in an EIR.

e. Other public facilities?

Less Than Significant Impact. The Project Site is located in an urbanized and densely populated area of the City. Library service is provided by the Los Angeles Public Library (LAPL). The library

³³ Los Angeles Unified School District. 2018 Developer Fee Justification Study. March 2018. Available at: https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%20201 8%20FINAL.pdf. Accessed July 2019.

branches serving the Project Site include the Sherman Oaks Martin Pollard Branch, located approximately 2.3 miles northwest at 14245 Moorpark Street; the Studio City Branch, located approximately 2.65 miles northeast at 12511 Moorpark Street; and the Westwood Branch, located approximately 3.8 miles southwest of the Project Site at 1246 Glendon Avenue. The Project's impacts upon library services are determined based on the need for new or expanded government facilities. LAPL adopted a strategic plan in 2007, which guides facilities expansions and other capital improvements. The Plan includes recommended sizes based on population but does not lay out requirements. The adopted draft plan includes a proposed new branch library generally along Mulholland Drive between Roscomare Road and Beverly Glen Boulevard. Funding for LAPL is supplied by the City's general fund, and the new facility was identified as a need in 2006. Although the Project would introduce new residents, hotel guests, and employees to the Project Site, which would in turn incrementally increase demands for library services and facilities, such additional demand would be minimal. Therefore, the Project's limited demand for library services and facilities would not trigger the need to construct new or expanded library facilities and impacts in this regard would be less than significant. As such, this issue would not be further analyzed in an EIR.

XVI. RECREATION



- recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? b. Does the project include recreational facilities or
- require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

a. Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. The City's existing parkland level of service ratio is 4.2 acres per 1,000 residents.³⁴ The Project's residential portion is estimated to generate up to 27 new residents at 182.95 square feet per person, and therefore the Project would result in the need for approximately 0.113 acres of public parkland.³⁵ As noted above, the Project's hotel component is not expected to result in a measurable increase in population within the City, as the future

³⁴ Citv of Los Angeles Department of City Planning. Department of City Planning Recommendation Report. Available at: http://planning.lacity.org/ordinances/docs/parksdedication/QuimbyFinal.pdf. Accessed September 2019.

³⁵ Calculated as: (4.2 acres x 43,560 SF per acre = 182,952 SF) / (1,000 residents) = 182.952 SF per resident; (182.95 SF/resident x 27 residents = 4.207 SF; (4.940 SF / 43.560 SF per acre) = 0.11341 rounded to 0.113.

employees are anticipated to already live and work in the area such that relocation to the Project area would not be necessary. In addition, the Project contains a total of approximately 24.6 acres of open space area within both the hotel and residential portions of the site (including landscaped areas and walking pathways) and an approximately 8,000-square-foot dog park that would be accessible to the on-site residential community, hotel guests, and the general public in the area. As stated in response to Checklist Question XV.d, above, although the Project would introduce new residents, hotel guests, and employees to the Project Site that may visit nearby parks, the Project's impact on demand for park services, and the potential for such demand to cause substantial physical deterioration, would be minimal given the limited intensity of the proposed residential development. The Project would be required to pay the applicable Development Impact Fees based on Quimby Act parkland allocation. The payment of the fee would assist in the acquisition of parkland, the construction of new parks, or improvements to existing parks. Therefore, this issue would not be analyzed in an EIR.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The proposed project does not involve, and would not require, the construction or expansion of off-site recreational facilities. The Project includes new recreation facilities for hotel guests and residents of the residential portion of the Project, which would generally be accessible to the public within the hotel portion of the site. These amenities include, spa, gym, pool, pool decks, and outdoor private areas on each single-family lot for the residential development portion of the Project. The Project also includes an 8,000-square-foot public dog park open to the surrounding community, as well as over approximately 24.6 acres of private open space (including landscaped areas and walking pathways) that are generally accessible to Project residents and hotel guests. The environmental effects associated with Project, which includes recreation facilities, are discussed throughout this Initial Study and as warranted would be evaluated in the EIR. However, in relation to the on-site recreational uses, there would be no unique or extreme effects attributable to the proposed recreational functions, that would in itself create an adverse physical effect on the environment.

As mentioned above in Checklist Question XV.d, above, the Project's payment of Quimby fees (LAMC 17.12) and Dwelling Unit Construction Tax (LAMC Section 21.10.3(a)(1)) would also help to offset some park demand and would be utilized for park and recreational facility acquisition, expansion, and improvement. The impact of planned or required recreational facilities would be minimal and less than significant given the limited intensity of residential development proposed under the Project. Therefore, no mitigation is necessary, and this topic will not be analyzed further in an EIR.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				
 b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? 	\boxtimes			
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
d. Result in inadequate emergency access?	\boxtimes			

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Potentially Significant Impact. The Project Site is subject to the Los Angeles Department of Transportation (LADOT)'s 2019 Transportation Assessment Guidelines (TAGs), which are intended to evaluate a Project's impacts on the City's transportation network. The Project would develop the Project Site with a hotel with 59 guestrooms and 8 single-family homes. The Project would also have the potential to impact the circulation system and area roadways. Based on LADOT's latest screening criteria, Project-related improvements or traffic could potentially result in adverse effects on the transportation system and associated transportation facilities. Therefore, the Project could result in a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts in this regard would be potentially significant. Therefore, this topic will be analyzed further in an EIR.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Potentially Significant Impact. CEQA Guidelines Section 15064.3(b) provides criteria for analyzing transportation impacts, and states "...Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact." Since the Project Site is not located in proximity to a major transit stop or along a high quality transit corridor, and the Project would substantially increase the intensity of development on the Project Site compared to existing conditions (and therefore is expected to increase VMTs generated in the area that are attributable

to the Project Site), impacts related to this issue would be potentially significant. Therefore, this topic would also be analyzed further in an EIR.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Potentially Significant Impact. The Project would not substantially alter existing street patterns in the Project vicinity but would result in modifications to the public right-of-way for the construction of a new proposed driveway connection to Hutton Drive connecting to the new and/or realigned roadways on-site. Project construction may also require temporary lane or sidewalk closures, and operation of the Project would slightly alter the way vehicles access the Project Site. As such, impacts would be less than significant, and this issue would not be further evaluated in an EIR.

d. Result in inadequate emergency access?

Potentially Significant Impact. The primary vehicular access to the Project Site would be provided via Hutton Drive. An access point to serve the single-family residences, which would also serve as a secondary emergency access for the hotel, would be provided from Wanda Park Drive. A third access point, also serving as emergency access, would be provided by Oak Pass Road. While it is expected that the majority of Project-related construction activities would be confined to the Project Site, it is possible that construction activities could temporarily affect emergency access on portions of adjacent streets during certain periods of the day. In addition, construction activities may generate traffic around the Project vicinity. Once operational, the Project would contribute to increases in residents, hotel guests, and employees in and around the Project area that may also contribute to traffic increase and potential emergency access in the Project area. Therefore, this issue would be evaluated in an EIR.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:



b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.



a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

Potentially Significant Impact. The Project Site is sparsely developed with existing single-family uses and open space and is located within an urbanized portion of the City of Los Angeles. Construction would require grading and excavation activities for building foundations and subterranean parking. The existence of tribal cultural resources on the Project Site is currently unknown; therefore, this topic would be analyzed further in an EIR to determine the potential for, and significance of, tribal cultural resources.

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource to a California Native American tribe.

Potentially Significant Impact. Refer to Checklist Question XVIII.a, above. This issue would be further analyzed in an EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
		\boxtimes	
		\boxtimes	
		\boxtimes	
		\boxtimes	

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The Project would be developed within the boundaries of the Project Site, which currently is largely undeveloped except for two single-family residential units, seven graded pads and other infrastructure. Existing infrastructure includes water lines, sewer/septic facilities, storm drains/pipes, natural gas pipelines, cable television/internet lines, and electrical distribution facilities. The proposed on-site sewer system for the hotel component would be connected to the existing sewer main in Hutton Drive, while the proposed single-family homes would be connected to the existing sewer main in Wanda Park Drive. All sewers proposed on-site would be gravity sewers (i.e., sewage flows by gravity with no pumps or lift stations required), and thus no pumps would be necessary for the on-site main sewer pipelines. However, some of the single-family homes that are located downhill of the private street could require pumps, which includes Lots 4, 5, 6, and 7. On-site sewer mains would be located within the proposed private streets, all of which would be gravity sewers. An approved Wastewater Service

Information Request (WWSI) would be required by the City to confirm that adequate capacity exists in existing sewer facilities serving the Project Site to meet the projected demands of the Project. An internal sewer capacity study has been performed to confirm that the existing sewer mains are adequate to accommodate the additional wastewater volume. No major upgrade to the existing sewer main is currently planned.

The proposed on-site water system would be a "looped" system that connects to two existing water mains located in Oak Pass Road and Hutton Drive. The Wanda Park Drive water main is on a different pressure system than the Oak Pass Road and Hutton Drive water mains, and therefore the Project cannot connect to the Wanda Park Drive pipeline. An approved water system design would be required for the Project to confirm that there are adequate pressures and flow rates (including fire protection) available from existing facilities to meet the demands for the Project. At this time, no installations or upgrades to the existing off-site water distribution system are currently planned. The construction or expansion of on-site facilities, as well as connections to existing off-site water and sewer facilities, are not expected to result in substantial adverse effects as such improvements would occur in the context of the overall Project construction effort, and thus would represent only a small incremental increase in the amount of construction activity occurring on or near the Project Site. All construction-related measures that would be required to be implemented for Project construction would also be implemented, as appropriate, as part of such infrastructure-related construction activities. Therefore, impacts associated with the expansion, relocation, and/or construction of water, wastewater, stormwater, energy or telecommunications facilities to serve the Project would not be considered substantial in the context of overall Project construction activities. As such, impacts in this regard would be less than significant and this topic would not be analyzed further in an EIR.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. Construction of the Project would require water for construction activities, such as dust control. However, these activities would be limited and temporary, and as such, would not consume large quantities of water such that additional supplies would be required. Once operational, the Project would create an increased demand for water supplies to support its new hotel and residential uses. Certain development projects in California are required to prepare a projects-specific Water Supply Assessment (WSA) or Verification of Sufficient Water Supply (VSWS) pursuant to Water Code section 10912 and Government Code section 66473.7 based on their type and intensity of development and associated projected water demand. Specifically, those projects requiring preparation of a WSA include the following: residential developments of more than 500 dwelling units; shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space; commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space; hotels, motels, or both, having more than 500 rooms; industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area; mixed-use projects that include one or more of the projects listed above; or projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project.³⁶ Only residential projects proposing a subdivision (tentative tract map) with 500 or more dwelling units are required to prepare a VSWS.³⁷ As such, preparation of a WSA or VSWS is not required for the Project. Although the development proposed on the Project does not meet the criteria to trigger the preparation of a WSA or VSWS, the implementation of the Project would incrementally increase demand for water supplies within the Los Angeles Department of Water and Power (LADWP)'s service area. However, the City has indicated that adequate water supplies and distribution facilities are currently available to serve the Project's projected demands, and thus no new or expanded entitlements would be required. ³⁸ Specifically, according to the LADWP 2015 Urban Water Management Plan, the City's water supplies are expected to be adequate to meet projected future demands ranging from 642,400 acre-feet (AF) in 2020 to 709,500 AF by 2040 under single dry year conditions.³⁹ Based on a conservative assumption of 200 gallons per day (gpd) per hotel room and 500 gallons per day per residential unit, the Project would be expected to generate a demand of approximately 15,800 gpd, or approximately 17.7 AF per year.⁴⁰ As such, the Project's water demand would represent approximately 0.0028 percent and 0.0025 percent of LADWP's projected water demands for 2020 and 2040, respectively.⁴¹ In addition, it should be noted that the majority of the on-site stormwater flows would be captured by proposed detention tanks and re-used for landscaping purposes to further reduce the Project's overall water demand. Therefore, given the limited incremental increase in water demand associated with the Project, impacts would be less than significant, and this topic would not be evaluated in an EIR.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The Los Angeles Department of Public Works, Bureau of Sanitation (also known as LA Sanitation & Environment [LASAN]) provides wastewater collection services for the Project Site and local areas within the City of Los Angeles, flows from which are

³⁶ California Department of Water Resources. Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001. October 2003. Available at: https://water.ca.gov/LegacyFiles/pubs/use/sb_610_sb_221_guidebook/guidebook.pdf. Accessed September 2019.

³⁷ Ibid.

³⁸ Los Angeles Department of Water & Power. Will-Serve Letter for Tract No. 74908. August 16, 2018. This document is included in Appendix F of this Initial Study.

³⁹ Los Angeles Department of Water and Power. 2015 Urban Water Management Plan. Adopted April 27, 2016. Available

https://www.ladwp.com/cs/idcplg?ldcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelection Method=LatestReleased. Accessed January 10, 2019.

⁴⁰ City of Los Angeles. L.A. CEQA Thresholds Guide. 2006. Table M.2-12, Sewage Generation Factors. Available at: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf. Accessed May 2020. Used hotel guest room factor of 130 gpd, but added 70 gpd to account for water not disposed into the sewer system (e.g., outdoor water use); used residential single-family dwelling 3-bedroom (230 gpd) plus 50 gpd for each additional bedroom (assumed 5 bedrooms) = 430 gpd rounded up to 500 to account for outdoor water use. Daily demand calculated as: (59 hotel rooms x 200 gpd = 11,800 gpd) + (8 single-family homes x 500 gpd = 4,000 gpd) = 15,800 gpd total for the Project.

⁴¹ Water demand percentage of supply calculated as: (15,800 gpd x 365 days/year = 5,767,000 gallons per year) / (325,850 gallons per AF) = 17.698 AF per year. Percent of demand calculated as: 17.698 AF per year / 642,400 AF for 2020 = 0.0000275, or 0.00275% rounded up to 0.0028% for year 2020; and 17.698 AF per year / 709,500 AF for 2040 = 0.0000249, or 0.00249% rounded up to 0.0025% for year 2040.

conveyed to major trunk sewers owned and operated by the Sanitation Districts of Los Angeles County (LACSD). Any wastewater that would be generated at the Project Site would be treated at the Hyperion Treatment Plant (HTP). The HTP is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP) and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP). The HTP is designed to treat a maximum of 450 million gallons per day (mgd) of dry weather flows (or a maximum of 800 mgd of wet weather flows), and has an average dry water flow of approximately 275 mgd, leaving approximately 175 mgd of capacity available.⁴² The discharge of effluent from the HTP into Santa Monica Bay is regulated by the HTP's NPDES Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board (RWQCB)'s requirements for a recreational beneficial use. The Project would result in new sources of wastewater generated at the Project Site with the development of a hotel with 59 guestrooms and 8 single-family homes, and could incrementally increase the quantity of wastewater generated. Specifically, as noted above in Checklist Question XIX.b., the Project would have an estimated water demand of approximately 15,800 gpd; conservatively assuming that all of this water demand would be discharged to the City's sewer system as wastewater. This amount of wastewater would represent approximately 0.009 percent of the remaining daily treatment capacity of the HTP. This incremental increase in wastewater treatment demand would not be considered substantial and would be well within the existing treatment capacity of the HTP. Therefore, impacts in this regard would be less than significant and this topic would not be further evaluated in an EIR.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The management of solid waste in the City of Los Angeles involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. While the Los Angeles Bureau of Sanitation (BOS) provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most commercial developments within the City. The Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. According to the Solid Waste Facility Permits for these facilities, they have a combined permitted daily disposal limit of 18,100 tons per day.⁴³

The Project would develop a hotel with 59 guestrooms, 8 single-family homes, and associated parking and infrastructure, which would create an increased quantity of solid waste generation within the Project Site. Based on standard solid waste generation factors of 4 pounds per day per hotel room and 12.23 pounds per day per residential unit, the Project's proposed uses are estimated to generate approximately 333.8 pounds per day of solid waste, or 0.167 tons per

⁴² City of Los Angeles, LA Sanitation. Hyperion Water Treatment Plant. Available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-phwrp?_adf.ctrl-state=8j3znq69s_5&_afrLoop=9398301962999194#!. Accessed September 2019.

⁴³ CalRecycle. SWIS Facility Detail - Chiquita Canyon Sanitary Landfill (19-AA-0052). Available at: https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-0052; and SWIS Facility Detail - Sunshine Canyon City/County Landfill (19-AA-2000). Available at: https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-2000. Accessed September 2019.

day.^{44, 45} This amount of solid waste generation, which does not account for source reduction and recycling diversion, represents only approximately 0.00092% of the daily permitted disposal capacity at the two affected landfill facilities.⁴⁶

Even when not accounting for source reduction and recycling diversions that would reduce the amount of Project-related solid waste requiring landfill disposal, would not measurably affect the disposal capacity of the landfills serving the Project Site, and therefore impacts would be less than significant and no mitigation is required. As such, this topic would not be further evaluated in an EIR.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. As described above, the Project proposes new hotel uses and increased residential uses that would increase the quantity of solid waste generated in the Project area. Nonetheless, the Project would comply with all applicable federal, state, and local statutes and regulations related to solid waste, including the City's Solid Waste Integrated Resources Plan (SWIRP), also known as the "Zero Waste Plan", which aims to achieve 90 percent waste diversion City-wide by 2025.⁴⁷ The City's SWIRP implements various strategies and requirements of prior State-level legislation regarding solid waste diversion and recycling, including Assembly Bills 939 (approved in 1989) and 341 (approved in 2011), but requires even more stringent waste diversion and recycling goals. Consistent with the SWIRP, the Project would support the City's 90 percent diversion goal by complying with City regulations for implementation of construction and demolition debris recycling through all phases of construction, provision of recycling facilities and waste reduction programs for proposed hotel uses, and curbside recycling bins and residential waste reduction strategies for proposed residential uses. With the implementation of on-site waste reduction and recycling facilities and programs consistent with the City's SWIRP, impacts would be less than significant, and no mitigation measures are required. Therefore, this topic would not be further analyzed in an EIR.

⁴⁴ CalRecycle. Estimated Solid Waste Generation Rates. Available at: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates. Accessed September 2019.

 ⁴⁵ Solid waste generation calculated as: (59 hotel rooms x 4 lbs/day = 236 lbs) + (8 residential units x 12.23 lbs/day = 97.84 lbs) = 333.84 lbs/day (rounded to 333.8 lbs/day) / (2,000 lbs/ton) = 0.1669 tons/day (rounded to 0.167)
 ⁴⁶ O the local data is a standard data in the local data is a standard data in the local data is a standard data in the local data is a standard data i

⁴⁶ Calculated as: (0.167 tons/day) / (18,100 tons/day) = 0.0000092 x 100 = 0.00092%

⁴⁷ LA Sanitation. City of Los Angeles Solid Waste Integrated Resources Plan – A Zero Waste Master Plan. October 2013. Available at: https://www.lacitysan.org/san/sandocview?docname=cnt012522. Accessed September 2019.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
\boxtimes			
\boxtimes			
\boxtimes			

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Potentially Significant Impact. The Project Site is located in a Very High Fire Hazard severity zone.⁴⁸ As discussed above in Checklist Question IX.f, implementation of the Project would generate additional traffic on the local street network in the area, thus potentially reducing vehicular access to and from the Project Site. Given the limited number and capacity of roadways in the immediate area surrounding the Project Site, implementation of the Project could limit emergency vehicle access and traffic flow along evacuation routes in the event of an emergency. As such, impacts could be considered potentially significant and this issue would be evaluated in an EIR.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Potentially Significant Impact. As discussed above in Checklist Question IX.g, the Project Site is located in a residential area that includes single-family residences, undeveloped areas, and

⁴⁸ City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/. Accessed September 2019.

areas with sloping hillside topography. In addition, the Project Site is located within a Selected Wildland Fire Hazard Area, specifically, the Mountain Fire District area.⁴⁹ According to ZIMAS, the Project Site is located within a City-designated Very High Fire Hazard Severity Zone.⁵⁰ Therefore, implementation of the Project could exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, this topic would be evaluated in an EIR.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Potentially Significant Impact. Implementation of the Project would require the installation and maintenance of several infrastructure improvements such as roads, fuel management zones (i.e., fire breaks), stormwater facilities, electrical facilities, and other utilities. While these facilities would not be expected to individually increase fire risks, collectively they could potentially result in exacerbated fire risks for the Project Site and surrounding area or temporary or ongoing impacts to the environment. As such, this issue would be analyzed in an EIR.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Potentially Significant Impact. As discussed above in Section X, Hydrology and Water Quality, the Project would have a less than significant impact related to erosion, siltation, flooding, and increased pollutant loads in stormwater flows generated on-site. However, the as potential exacerbation of these effects associated with post-fire burn areas is unknown and this issue would be further evaluated in an EIR.

⁴⁹ City of Los Angeles General Plan Safety Element. Safety Element Exhibit D: Selected Wildfire Hazard Areas in the City of Los Angeles. Adopted November 1996. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf. Accessed September 2019.

⁵⁰ City of Los Angeles. Zone Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/. Accessed September 2019.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

- a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts to sensitive habitats and species, as well as to archaeological and Tribal Cultural Resources. As discussed in Section IV, Biological Resources, of this Initial Study, a biological resources assessment is being prepared for the Project, which would address potential impacts to wildlife habitats, sensitive species, and sensitive natural communities. As discussed in Section V, Cultural Resources, of this Initial Study, the Project would not result in significant impacts on historic resources, but it could cause potentially significant impacts to elements of prehistory and unknown archaeological resources. An EIR would be prepared to analyze and document these potentially significant impacts.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
\boxtimes			

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with impacts from other development to result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects whose development, in conjunction with that of the Project on both an individual and cumulative basis may have a potentially significant impact. For each of the issues determined to be potentially significant in the Initial Study — namely, aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, land use and land planning, noise, public services (fire protection and police protection), transportation, tribal cultural resources, and wildfire — these resources are generally site specific and need to be evaluated within the context of each individual project. Cumulative effects for these topics would be discussed further in an EIR.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, land use and land planning, noise, public services (fire protection and police protection) transportation, tribal cultural resources, and wildfire. Such impacts could potentially result in substantial adverse impacts to human beings through either health risks due to a degradation in environmental resources or through increased risks to safety through delayed response times or congestion. Therefore, these issue areas would be further evaluated in an EIR.



NOTICE OF PREPARATION OF ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

Agenda Item 9(b) SMMC 12/21/2020

November 10, 2020

Puede obtener información en Español acerca de esta junta llamando al (213) 847-3656.

ENVIRONMENTAL CASE NO.:	ENV-2018-1509-EIR
PROJECT NAME:	The Retreat at Benedict Canyon Project
PROJECT APPLICANT:	9712 Oak Pass Road, LLC
PROJECT ADDRESS:	9704-9712 W. Oak Pass Road, 9800, 9801-9815 W. Wanda Park Drive, 2534 N. Hutton Drive, APNs 4382-014-0124383-002-005 4383- 002-009, 4383-004-017, and 4384-010-012, Los Angeles, California, 90210
COMMUNITY PLAN AREA:	Bel Air-Beverly Crest
COUNCIL DISTRICT:	5 – Koretz
PUBLIC COMMENT PERIOD	November 10, 2020 – December 9, 2020
SCOPING MEETING	December 2, 2020 – 5 PM. See below for additional information

The City of Los Angeles (City) intends to prepare an Environmental Impact Report (EIR) for the proposed The Retreat at Benedict Canyon Project (Project). In accordance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, the City has prepared this Notice of Preparation to provide the public, nearby residents and property owners, responsible agencies, and other interested parties with information regarding the Project and its potential environmental effects. The EIR will be prepared by outside consultants under the supervision of the City of Los Angeles, Department of City Planning.

The City requests your written comments as to the scope and contents of the EIR, including mitigation measures or project alternatives to reduce potential environmental impacts from the Project. Comments must be submitted in writing according to directions below. If you represent a public agency, the City seeks written comments as to the scope and content of the environmental information in the EIR that are germane to your agency's statutory responsibilities in connection with the Project. Your agency may need to use the EIR prepared by the City when considering your permit or other approval for the Project.

A Public Scoping Meeting will be held to receive input as to what environmental topics the EIR should study. No decisions about the Project are made at the Public Scoping Meeting. Additional project details, meeting information, and instructions for public comment submittal are listed below.

PROJECT LOCATION AND EXISTING ON-SITE USES:

The Project Site includes fifteen individual parcels and is located within Benedict Canyon in the City of Los Angeles. The Project Site is surrounded by existing single-family residential uses on all sides, and is roughly bounded by Benedict Canyon Drive to the west, Hutton Drive to the north, Oak Pass Road to the east, and Yoakum Drive to the south.

See attached Project Location Map.

PROJECT DESCRIPTION:

The Retreat at Benedict Canyon Project (Project) proposes the demolition of two existing single-family residences and the construction of a 59-quest room hotel and eight single-family residences on an approximately 33-acre property in Benedict Canyon. The Project consists of hotel uses within 19 buildings on the northern 16-acre portion of the site, and eight single-family residences on the southern 17-acre portion of the site. The main five-story hotel building includes up to 18 guest rooms, 7,960 square feet of bar/restaurant uses, 10,900 square feet of spa/fitness uses, outdoor pool and spa amenities, and an additional two floors of subterranean parking, for a total of 60,860 square feet of building floor area. An additional 15 bungalow-style hotel buildings, each up to two-stories in height, would be dispersed throughout the hotel portion of the site, and would contain the remaining 41 hotel guest rooms with a total of 54,500 square feet of floor area. Three ancillary hotel buildings containing the main valet and hotel reception area, a rooftop restaurant, screening room, administrative uses, other hotel support services, and parking, would total 28,840 square feet of building floor area. Overall, the total floor area for the hotel portion of the site would be 144,650 square feet. Access between the main hotel building and main parking structure could include a funicular railway. The eight single-family residences on the eastern portion of the site would range in size from approximately 12,000 to 48,000 square feet of residential floor area, and would have a combined residential floor area of up to 181,000 square feet. Development of the overall site would also include the removal of existing trees and vegetation and the installation of new landscaping, pathways, exterior decks, and other outdoor amenities. Preliminary site grading would require approximately 117,230 cubic yards of total grading and result in the off-site export of approximately 950 cubic yards of soil, while the remaining 116,280 cubic yards of cut would be balanced on-site. Maximum excavation depths would be approximately 62 feet below existing grade.

Summary of Proposed Floor Area

	Existing Development	
Land Use	(To Be Removed)	Proposed Development
Single-family residences	2 dwelling units	181,000 square feet sf (8 dwelling units)
Hotel		59 guest rooms
Hotel Bar/Restaurant		8,920 sf
Hotel Spa/Fitness		10,900 sf
Total Hotel Square Footage		146,610 sf
Total	2 dwelling units	327,610 sf

REQUESTED ACTIONS:

- Pursuant to Charter Section 555 and Los Angeles Municipal Code (LAMC) Section 11.5.6, a General Plan Amendment to the Bel Air - Beverly Crest Community Plan to redesignate the site from Minimum Residential, Very Low I and Very Low II Residential land use designations to the High-Medium Residential land use designation, and to add a footnote to the Community Plan Land Use Map establishing the proposed Specific Plan as the land use regulatory document for the Project Site and to identify the corresponding land use designation with the Specific Plan zoning;
- 2. Pursuant to LAMC Section 12.32 Q a Vesting Zone Change from RE15-1-H-HCR, RE20-1-H-HCR, and RE40-1-H-HCR to the proposed Specific Plan zone.
- 3. Pursuant to LAMC Section 12.32 A, a Specific Plan to establish allowable uses, development standards and alcohol sales for development of the site;

4. Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, Haul Route, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT:

Based on an Initial Study, the Project could have potentially significant environmental impacts in the following topic area, which will be addressed in the EIR: Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas, Land Use, Noise, Public Services, Transportation, Tribal Cultural Resources, and Wildfire.

PUBLIC SCOPING MEETING:

A Public Scoping Meeting will be held in an online format using GoToWebinar, to share information regarding the Project and the environmental review process. City staff, environmental consultants, and Project representatives will be available during this meeting, which will begin with a pre-recorded presentation. After the Public Scoping Meeting has ended, a copy of the pre-recorded presentation will be posted to the Department's website at https://planning4LA.com/development-services/eir. The City encourages all interested individuals and organizations to attend this meeting. Questions may be submitted via the 'Questions' chat box in the control panel, but there will be no verbal comments or public testimony taken at the Public Scoping Meeting. A separate more detailed instructions page is included in this communication. No decisions about the Project will be made at the Public Scoping Meeting. A separate public hearing for Municipal Code entitlement requests, will be scheduled after the completion of the EIR. The date, time, and virtual location of the Public Scoping Meeting are as follows:

Date:	December 2, 2020
Time:	5 PM
Virtual Location:	Visit joinwebinar.com and enter webinar ID 339-777-955 and email address

FILE REVIEW AND COMMENTS:

The Department of City Planning recognizes the unprecedented nature of COVID-19 and, having been identified as an essential City service, continues to work and respond to all inquiries pertaining to our ongoing efforts to process entitlement applications. As a result of the Mayor's "Safer at Home" Order issued on March 19, 2020, means to access Project-related materials in-person may be limited. To that end, the Department of City Planning will ensure that interested parties seeking information about the Project will have access. A copy of this notice and the Initial Study prepared for the Project may be viewed with the environmental file or online at https://planning4LA.com/development-services/eir/.

To sign up for the interested parties list for this case, please visit: <u>https://forms.gle/aPCwQghEpHfsE3tr6</u>

The environmental file also may be available for public review, by appointment only, at the City of Los Angeles, Department of City Planning, 221 North Figueroa Street, Suite 1350, Los Angeles, CA 90012, during office hours Monday - Friday, 9:00 a.m. - 4:00 p.m. Please contact the Staff Planner listed below to schedule an appointment.

The City will consider all written comments regarding the potential environmental impacts of the Project and issues to be addressed in the EIR. If you wish to submit comments, please reference the Environmental Case No. above, and submit them in writing by **December 9, 2020, no later than 4:00 p.m**.

Please direct your comments to:

Mail: Jason McCrea City of Los Angeles, Department of City Planning 221 N. Figueroa Street, Room 1350 Los Angeles, CA 90012

Email: Jason.McCrea@lacity.org

Interested Parties: To sign up for the interested parties list for the project, please visit: <u>https://forms.gle/aPCwQghEpHfsE3tr6</u>.

ACCOMMODATIONS: As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability. Other services, such as translation between English and other languages, may also be provided upon written request submitted a minimum of seven (7) working days in advance to: <u>Jason.McCrea@lacity.org</u>. Be sure to identify the language you need English to be translated into, and indicate if the request is for oral or written translation services. If translation of a written document is requested, please include the document to be translated as an attachment to your email.

VINCENT P. BERTONI, AICP Director of Planning

Jason McCrea Major Projects Section Department of City Planning (213) 847-3672

Attachments: Vicinity Map Site Plan GoToWebinar Instructions

The Retreat at Benedict Canyon



Figure 1



Conceptual Site Plan Figure 5

DEPARTMENT OF

COMMISSION OFFICE (213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN PRESIDENT

VAHID KHORSAND VICE-PRESIDENT

DAVID H. J. AMBROZ CAROLINE CHOE HELEN LEUNG KAREN MACK MARC MITCHELL VERONICA PADILLA-CAMPOS DANA M. PERLMAN

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI

EXECUTIVE OFFICES 200 N. Spring Street, Room 525 Los Angeles, CA 90012-4801 (213) 978-1271

VINCENT P. BERTONI, AICP DIRECTOR

KEVIN J. KELLER, AICP EXECUTIVE OFFICER

SHANA M.M. BONSTIN DEPUTY DIRECTOR

ARTHI L. VARMA, AICP DEPUTY DIRECTOR LISA M. WEBBER, AICP DEPUTY DIRECTOR

> VACANT DEPUTY DIRECTOR

RE: GoToWebinar Instructions for The Retreat at Benedict Canyon Project Scoping Meeting - 9704-9712 W. Oak Pass Road, 9800, 9801-9815 W. Wanda Park Drive, 2534 N. Hutton Drive, APNs 4382-014-0124383-002-005 4383-002-009, 4383-004-017, and 4384-010-012, (Case No. ENV-2018-1509-EIR)

How to participate in the Virtual Public Scoping Meeting on December 2, 2020 (5:00 P.M.)

Thank you for participating in the Virtual Public Scoping Meeting. In this meeting you will learn more about The Retreat at Benedict Canyon Project (ENV-2018-1509-EIR) and have an opportunity to ask questions about the Project as well as provide input as to what environmental topics the Environmental Impact Report of the Project should study. For this Virtual Public Scoping Meeting we will be using GoToWebinar as our virtual platform. To participate you will need access to a computer/ tablet or smartphone. Please follow the instructions below to participate. For more detailed instructions please visit: https://support.goto.com/webinar/how-to-join-attendees.

- 1) Click the registration link <u>here</u> to enter your contact information and receive a confirmation email with information about joining the webinar.
- Join the meeting via your computer or tablet. You may use the link in your confirmation email or go to <u>joinwebinar.com</u> and enter webinar ID **339-777-955** and your email address.
- 3) Listen to the presentation.
- 4) Ask Questions: Use the 'Questions' chat box in the control panel of GoToWebinar. Questions will be answered in the order received after the presentation has ended.
- 5) Submit Public Comment after the meeting to Department of City Planning staff through regular mail or e-mail. Please follow instructions on the Notice of Preparation.

Note: If you experience any technical difficulties during the meeting:

- Please type in the 'Questions' chat box,
- Click the hand raise button (if using a computer),
- Or contact us at planning.liaison@lacity.org.

By Email Only to Jason.McCrea@lacity.org

SMMC Item 9(c) 12-21-2020

Jason McCrea City of Los Angeles, Department of City Planning 221 N. Figueroa Street, Room 1350 Los Angeles, CA 90012

RE: Scoping Comments for The Retreat at Benedict Canyon Project — OPPOSE

Case Number: ENV-2018-1509-EIR

Dear Mr. McCrea:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 46 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Federation's mission includes protecting the property and quality of life of the residents of the Santa Monica Mountains and other hillside areas of Los Angeles and its environs, and encouraging and promoting those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles.

The Federation strongly opposes the proposed Retreat at Benedict Canyon. This commercial venture would (1) replace two single-family homes in a minimum-low density residentially-zoned neighborhood in the Santa Monica Mountains—a designated "very high fire hazard severity zone"—with a 59-room hotel, spa, restaurants and bars, with rooftop dining, a screening room, subterranean parking, funicular railway, and (2) develop eight single-family residences on approximately 33-acres of mostly undeveloped open space.

The proposed development project violates zoning restrictions designed to protect the character of the surrounding low-density hillside residential community, sets a dangerous precedent for commercialization and intensification of use, exacerbates fire risks in this fire-prone hillside area, and is grossly inconsistent with the state's climate change policy. The project is therefore inconsistent with the Federation's mission and violates policies and programs that support consistency with zoning for public health and safety in the hillsides, that support maintaining lower densities to preserve wildlife habitat and connectivity, flora and fauna and protect the hillside environment from devastating wildfires.

To make matters worse, this precedent-shattering project is being streamlined for passage during the height of the COVID-19 pandemic—while public attention is
necessarily diverted from the important long-term public policy concerns implicated by the project.

Finally, it is important to emphasize the fire risks as our state is experiencing the largest and most destructive wildfire season recorded in California's modern history—with more than 4 million acres burned in 2020 so far. Experts warn this is the "new normal" due to (1) Climate Change producing hotter, drier, and more intense wildfires and (2) increased human intrusion into fire-prone areas like the Santa Monica Mountains. The project is flatly inconsistent with California Governor Newsom's April 2019 report "Wildfires and Climate Change: California's Energy Future," recommending that local governments begin to deprioritize new development in areas of the most extreme fire risk.

The project also creates significant emergency-access risks. Primary Ingress and egress to the hotel portion of the project would be via Hutton Drive, while Wanda Park Drive would provide primary access to the project's residential component. Both are narrow substandard hillside streets. Each would provide inadequate secondary emergency access for the development and would expose residents to the risk of bottle-necking their means of evacuation in an emergency.

Constructing high-density projects like this in the Santa Monica Mountains moves us further from California's climate goals mandated by Governor Newsom in an executive order issued on October 7, 2020, committing the state to a goal of protecting 30 percent of California's land and coastal waters by 2030.

For all of the reasons stated above, the Hillside Federation opposes The Retreat at Benedict Canyon Project. Please add the Hillside Federation to the notification list for this project.

Sincerely,

Charley Mims President, Federation of Hillside and Canyon Association cc: Los Angeles Mayor Eric Garcetti Councilmember Paul Koretz Councilmember Mike Bonin Planning Director Vince Bertoni mayor.garcetti@lacity.org, kevin.taylor@lacity.org, paul.koretz@lacity.org, daniel.skolnick@lacity.org, councilmember.bonin@lacity.org, vince.bertoni@lacity.org,



December 16, 2020

by email, to the Honorable Councilmembers Mike Bonin and Paul Koretz

Councilmember Mike Bonin City of Los Angeles 200 N. Spring Street Los Angeles, CA 90012 <u>councilmember.bonin@lacity.org</u> <u>mj.bonin@lacity.org</u> Councilmember Paul Koretz City of Los Angeles 200 N. Spring Street Los Angeles, CA 90012 paul.koretz@lacity.org

Re: CPC-2020-5985-GPA-ZC-CA-SP; <u>ENV-2019-4565-EIR</u> BASPOA Request for Extension of Scoping Comment Period and some Comments OPPOSING the Berggruen Institute Project

Re: ENV-2018-1509-EIR

BASPOA Statement of Objection to Planning Department's Refusal to Extend Scoping Comment Period and some Comments OPPOSING the Retreat at Benedict Canyon Project

Dear Councilmembers Bonin and Koretz:

I am writing to you on behalf of Bel Air Skycrest Property Owners' Association (BASPOA) to request that the Comment Period for the Berggruen Institute Scoping be extended by *at least 45 days beyond the current December 21st deadline*, and, additionally, to protest the Planning Department's refusal to extend the Scoping Comment Period for the Retreat at Benedict Canyon.

Since early in the pandemic, the call has gone out for the City to PLEASE HOLD BACK on the release of environmentals and to EXTEND public comment periods. Such simple measures would have gone (and could still go) a long way toward helping ensure continuity of proper planning process in these difficult times. But the Planning Department has apparently decided to ignore these very reasonable requests and instead is moving full speed ahead on a number of large,

extremely impactful projects, leaving Covid-impacted (and *dis*tracted!) citizen-stakeholders scrambling to keep up.

This trend—and these two projects in particular—spell trouble ahead for the City and especially for our fragile and already endangered hillsides which are BASPOA's principal concern. The scoping documents for the Berggruen Institute and the Retreat at Benedict Canyon both describe out-of-scale private commercial developments that are inappropriate to their proposed urban-wildlands sites, where low density residential zoning interfaces with supposedly protected open space. Both sites are home to vital wildlife habitat and corridors and to public recreational trails. Both sites are within a designated Very High Fire Hazard Severity Zone. And, like so much of the hillsides, they are both in/adjacent to areas already developed to the tipping point, where infrastructure and emergency response times are often "substandard." In order to allow the building of such impactful, growth-inducing projects on these clearly inappropriate sites, both Applicants are requesting unprecedented changes to the General Plan and to their respective Community Plans. (The Berggruen Project actually goes so far as to request its own Berggruen Specific Plans!) The residents of Bel Air Skycrest, situated as we are a few miles west of Benedict Canyon and a mile or two north of the Berggruen site, are deeply concerned about both these projects and the negative impacts they will inevitably have on the local canyon ecosystems, as well as their implications for the Santa Monica Mountains as a whole.

WHAT IS AT STAKE?

Along with our famously temperate climate and beautiful beaches, the Santa Monica Mountains are nature's greatest gift to Los Angeles—a 46-mile swath of topographically diverse wilderness, miraculously—and tenuously—surviving inside a great urban center. This mountain range (one of the world's largest pristine, ecologically complex, protected Mediterranean ecosystems) is home to over 1,000 plant species and some 500 bird, reptile, amphibian and mammal species. (To give just one example of the uniqueness of our situation: Los Angeles is one of only two megacities in the world where big cats—mountain lions in LA, leopards in Mumbai, India—live *within the city limits!*) So it is no wonder that the United States Congress recognized these mountains as a national treasure back in 1978, when it established the Santa Monica Mountains National Recreation Area, under the auspices of the National Park System.

Any urban-wildlands "marriage" is inherently fraught. The effort to conserve and the drive to develop coexist uneasily at the best of times. Bel Air Skycrest has experienced this conflict firsthand. Our sleepy little community is located off Mulholland, one mile west of the 405 freeway, cheek by jowl with the Mulholland Institutional Corridor. The corridor started small, little more than a footnote to the vision and the protections laid out in the Mulholland Scenic Parkway Specific Plan. But it has grown, and over the years our community has seen—and FELT—the impacts as institutional tentacles have, individually and cumulatively, crept farther and farther beyond the limits that were intended (and once believed) to guarantee compatibility with both the area's low density residential zoning and with the rural, open space character of the parkway.

If either of these new projects is greenlighted, the impacts will be huge. And the first impact will, in all likelihood, be the greenlighting of the *other* project—followed by *many* other projects after that! Concerns about precedent-setting impacts often seem remote, even abstract, at this stage in the planning process. But if the zoning actions requested for these projects are approved, a whole slew of other hillside projects will emerge ready and waiting from the wings, so it won't be long before the cumulative and very concrete impacts begin to be felt. Years of construction followed by decades of commercial operations will profoundly impact our precious mountains. Extensive grading will erode the structural, biological and aesthetic integrity of the hillsides. The growth-inducing nature of the projects will lead to ever-increasing density and traffic congestion and yet longer emergency response times. Increased noise and light pollution will take their toll. And wildlife corridors and habitat will inevitably be lost, which will be a death knell for the wildlife itself. As happened with the Institutional Corridor, the tentacles, individually and cumulatively, will continue to spread and intensify over time. Make no mistake: however good the intentions behind these projects may be (both initial studies claim to offer environmental and community benefits), we are looking at the ongoing, systematic degradation and destruction of the finite, already endangered reserves of open space and natural beauty within our city. Oscar Wilde once wrote that "each man kills the thing he loves", and so it is: the very qualities which make these sites so attractive to the developers of a prospective think tank and urban wildlands retreat in the first place will doom them to exploitation and extinction.

Along with the actual physical destruction of Santa Monica Mountains habitat, the time-honored democratic process which is supposed to guide our city planning will be fatally undermined. All the long-contemplated, carefully crafted, intensely fought over protections which the City and its citizenry have worked so hard to put in place over the years, in recognition of the value and the fragility of our hillsides and canyons, will fall like dominoes. The timing alone—amending the General Plan and changing zoning to facilitate what are essentially land grabs—and all just in advance of the City's revisions of its various Community Plans and the creation of a long-awaited Ridgeline Ordinance—at a moment when we are all laid so low by this horrible pandemic—feels like a particularly shameless betrayal of public trust, a Hail Mary pass that, in the current political climate, can only be interpreted as an attempt to minimize inconvenient, time-consuming input from the community and circumvent the rule of law. (Here again, longtime Bel Air Skycrest residents are reminded of the way that the Mulholland Scenic Parkway's creation and approval was dragged out over 20 years, during which interim developers had their way and the Institutional Corridor was able to expand its foothold far beyond what was originally intended.) As a result, those upcoming Community Plan Revisions, the overdue Ridgeline Ordinance, and so on will be seriously compromised from Day One in their ability to address the problems of megafires and climate change and all the other challenges our City faces (and will continue to face once the pandemic is finally under control).

Is this the legacy we want for our city?

What is the big rush here? Surely the preservation of our beautiful mountains and the many lifeforms in them; the health, safety and quiet enjoyment of our residential communities and of

visitors from across our city and around the globe are more important than fast tracking all these projects? Bel Air Skycrest Property Owners' Association asks that the City respect the protections that the City itself put in place and SLOW DOWN THIS PROCESS, extend the public comment periods, and ensure that stakeholders still have our rightful say, even during these very challenging times!

Kindly enter this letter into record for both the Berggruen Institute and the Retreat at Benedict Canyon, and please put BASPOA on the notification lists for both projects.

Respectfully,

Lois Becker, BASPOA Community Liaison PO Box 260503 Encino 91426 info@baspoa.org

3100 Corda Drive Los Angeles 90049 loismark@gmail.com

CC:

Mayor Eric Garcetti, City of Los Angeles Vince Bertoni, Director of City Planning Kevin Keller, Executive Officer of City Planning Alan Como, AICP City Planner Jason McCrea Santa Monica Mountains Conservancy (SMMC) Mulholland Design Review Board (MDRB) Federation of Hillside and Canyon Associations (Hillside Federation) Brentwood Residents Coalition (BRC) Canyon Back Alliance (CBA) Mountaingate Open Space Maintenance Association (MOSMA)